EU-SERBIA STABILISATION AND ASSOCIATION AGREEMENT

Twelfth SUB-COMMITTEE
ON JUSTICE, FREEDOM AND SECURITY
24-25 February 2026 (morning only), Belgrade

DRAFT AGENDA with written questions

1. Welcome, opening and adoption of the agenda

Horizontal issues

Additional questions Rule of Law report:

On civil society:

- Please update in case of new developments, since the last JLS subcommittee, regarding the legal framework for registration and dissolution of CSOs.

Ministry of Human and Minority Rights and social Dialogue

Under the Action Plan for the period 2025–2026 for the implementation of the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the period 2022–2030, the preparation of an *ex post* analysis of the implementation of the Law on Associations, accompanied by recommendations, is envisaged. The Ministry of Human and Minority Rights and Social Dialogue has initiated the process of preparing the analysis, which is intended to include an overview of the current state of affairs, implementation practice, and recommendations for the improvement of this Law. It is planned that the analysis will be conducted, in accordance with the provisions of the Law on the Planning System, through a broad consultative process involving representatives of public administration authorities as well as civil society organizations.

- Please update in case of new developments on rules and practices in place to ensure the effective operation and safety of CSOs and human rights defenders. This encompasses protection measures against various forms of attacks, intimidation, legal threats such as SLAPPs, negative narratives or smear campaigns, and efforts to monitor threats or attacks, along with dedicated support services.

Ministry of Human and Minority Rights and social Dialogue

As previously reported, the Chair of the Council for Creating an Enabling Environment for the Development of Civil Society, Mr A. Prica (Association DUGA), informed the

Ministry on 24 January 2025 that the members and alternate members of the Council representing civil society (the Council consists of 20 members, of whom 11 are representatives of civil society) had unanimously adopted a Decision not to participate in the work of, nor attend sessions of, the Council in the forthcoming period, thereby freezing their membership in this Government body.

In this regard, on 6 February 2025 the Ministry issued a public statement inviting all societal stakeholders, in particular representatives of the civil society sector, to take part in creating space for open and equitable dialogue within society, with a view to enabling—within the procedures available to the Ministry—the functioning of multiple mechanisms which for years have contributed to communication, cooperation and mutual understanding between public authorities and civil society organisations, for the benefit of society as a whole.

Starting from the fact that the work of the Council is of key importance for cooperation and direct dialogue with civil society, following the formation of the new Government of the Republic of Serbia on 16 April 2025, the Ministry submitted a request to all state authorities represented in the Council for the Creation of an Enabling Environment for the Development of Civil Society to nominate or reappoint members and alternate members to the Council.

In this context, the newly appointed Minister of Human and Minority Rights and Social Dialogue, Mr Demo Berisha, initiated direct bilateral meetings with members and alternate members of the Council in order to consider all outstanding issues. Since the beginning of May, several separate consultative meetings have been held with the President of the Council, Mr A. Prica, as well as ten separate consultative meetings with representatives of civil society organisations, which took place on 30 July and on 6, 12 and 20 August. In addition, one joint meeting between members and alternate members of the Council was held on 27 August, attended by senior representatives of public administration bodies. From the side of civil society organisations, the discussions were attended by representatives of the Belgrade Open School, the National Youth Council of Serbia, the Centre for Democracy Foundation, the Centre for Modern Skills, the Network of Organisations for Children of Serbia, the European Youth Centre, the Novi Sad Youth Forum, the Trag Foundation, Smart Kolektiv, Civic Initiatives, the Niš Committee for Human Rights, and the European Policy Centre.

The discussions confirmed the openness and readiness of the Government of the Republic of Serbia to continue and further enhance cooperation with civil society. Continued work of civil society organisations was supported, accompanied by a call to continue dialogue, overcome obstacles, and re-establish the regular functioning of the Council. During the open dialogue, the majority of civil society representatives also expressed readiness to continue cooperation, while requesting clear and unequivocally expressed support from the Government in addressing issues of particular relevance to the unhindered operation of their organisations.

Following the bilateral and joint meetings with the members of the Council, the members and alternate members representing civil society conducted internal consultations with civil society stakeholders and submitted to the Ministry of Human and Minority Rights and Social Dialogue a document entitled “Proposal of Measures Required to Unfreeze the Status of Members of the Council for Creating an Enabling Environment for the Development of Civil Society from among Civil Society

Organizations". With a view to continuing direct dialogue with civil society organisations, the Ministry of Human and Minority Rights and Social Dialogue has initiated activities aimed at establishing a new Council. A decision on the modality of the Council's further work will be taken in the forthcoming period.

The Ministry continuously provides support to public administration authorities in the inclusion of civil society organisations in the processes of drafting and adopting legislation and policy documents. In accordance with the procedure set out in the Guidelines for the Involvement of Civil Society Organisations in Working Groups for the Preparation of Public Policy Documents and Drafts or Proposals of Regulations, based on predefined selection criteria and equal opportunities for participation of all interested civil society representatives, a total of nine (9) public calls were implemented during 2025, proposing the inclusion of 32 civil society organisations, with one public call currently ongoing.

As the national contact point for the EU programme "Citizens, Equality, Rights and Values", the Ministry for Human and Minority Rights and Social Dialogue has continued to actively cooperate with civil society, as regards the strengthening of the sector's capacity to participate in the programme, build networks, exchange experiences, and establish partnerships through projects, thereby contributing to the increased participation of citizens and civil society in decision-making processes at the local, national, and EU levels, as well as in the democratic and civic life of the Union. From June 2025 until the end of 2025 organized more than 20 events with over 700 participants from the civil and public sectors.

Supreme Public Prosecution Office

Besides Criminal Code Article 387 provisions regarding criminal justice sanctioning of the violation of the basic human rights and freedoms guaranteed by the International conventions applied in the Republic of Serbia, which protection extends to the organizations and individuals who are actively supporting the equality of people (any), other mechanisms and practices are not known to the Supreme Public Prosecution of Serbia within criminal justice system.

- Please provide an update on the status of the case related to the police search of four CSO offices in February 2025.

Ministry of interior

Police officers from the Anti-Corruption Department acted upon the request of the Higher Public Prosecutor's Office in Belgrade, specifically the Special Department for the Suppression of Corruption (KTRKO-232/25, 25.02.2025). On March 3, 2025, the Higher Public Prosecutor's Office submitted a report for further jurisdiction and decision. Following the submission of the report, no additional requests were received.

- Please provide updated information on the financial support to CSOs and human rights defenders, including the frameworks ensuring access to funding, financial viability,

taxation/incentive/donation systems, and measures to ensure fair and transparent distribution of funding.

Ministry of Human and Minority Rights and social Dialogue

The financing of civil society organizations by public administration bodies is carried out at the national, provincial, and local levels, meaning that ministries and other state administration bodies finance programs and projects of public interest in accordance with priority goals and areas recognized in sectoral strategies. Financing is carried out through several different procedures, the dominant one being the public competition procedure.

With the aim of implementing the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the period 2022-2030, in particular Specific Objective 2, "Improved transparent financing and sustainability of the civil sector," the Ministry of Human and Minority Rights and Social Dialogue carried out several activities:

Improvements were made to the Public Calls Calendar application, which contributed to greater transparency in the process of planning and allocating funds to civil society organizations, monitoring approved programs and projects, and facilitating the search and administration of the application. The application has been published on the Ministry's website, and currently around 480 public calls for the allocation of funds to civil society organizations in 2025 have been entered, covering all three levels of government.

During the reporting period, the Ministry implemented the following training activities: in cooperation with the Commissioner for Information of Public Importance and Personal Data Protection, three training sessions were delivered on the application of the Law on Personal Data Protection. These included training for employees of state administration bodies and the Autonomous Province of Vojvodina, with the participation of 49 public administration representatives, as well as training for employees of local self-government units and for civil society organisations, delivered in an online format and attended by 158 participants.

To strengthen the capacities of employees in local self-government units, the Ministry, in cooperation with the Standing Conference of Towns and Municipalities, organized an accredited training from 30 October to 5 November 2025. This training was part of the Sectoral Program of Continuous Professional Development of Employees in Local Self-Government Units for 2025 and focused on Financing Public Interest Programs Implemented by Associations (three training sessions), with a total of 77 employees from local self-government units participating. During the fourth quarter, additional activities were implemented on the topic "Cooperation with civil society organisations", attended by 63 employees.

Within the framework of the project "Improving the Application of Good Governance Principles in Local Self-Governments", the Ministry, in cooperation with the Standing Conference of Towns and Municipalities, provided direct expert support to the municipalities of Boljevac, Vrbas, Vlasotince, Kuršumlija and Subotica, aimed at improving internal procedures and capacities for the allocation of funds and the publication of data related to programmes of public interest implemented by

associations. The following results were achieved: in all municipalities, an assessment of the current situation and support needs in the field of financing civil society organisations was conducted through analyses of strategic documents, local regulations and existing practices related to the financing of programmes implemented by associations; a Civil Society Organisation Financing Plan for 2025 was adopted; and a public call for the financing of programmes of public interest was launched; capacities for financing programmes of public interest implemented by associations were strengthened through training sessions focused on cooperation and transparent financing of civil society organisations. A total of 65 civil servants participated in these activities; support was provided in the adoption of a by-law on funds for stimulating programs or the missing part of funds for financing and developing programs of public interest.

During the reporting period, the Ministry launched two public calls for proposals for the allocation of funds to civil society organisations for the implementation of projects and programmes. For the first time, a Public Call for Strengthening the Capacities of Civil Society Organisations for Participation in the Legislative Process was launched, with the aim of ensuring higher-quality participation of civil society organisations in the drafting and monitoring of the implementation of public policy documents and regulations. Projects were supported in a total amount of RSD 1,842,415.00.

In addition, a Public Call entitled "Co-financing of projects of civil society organisations awarded European Union funds under the EU Civil Society Support Programme in the Republic of Serbia 2023–2024" was launched, aimed at supporting civil society organisations in strengthening participatory democracy and the EU integration and accession processes in Serbia, as well as enhancing cooperation and partnerships between civil society organisations and public institutions at all levels. Projects were supported in the total amount of RSD 3,994,853.44.

- Regarding all the above matters, please inform on both the current system and the future improvements planned by the 'Strategy for creating an enabling environment for the development of civil society'.

Ministry of Human and Minority Rights and social Dialogue

The key activities of the Action Plan for the period 2025–2026 for the implementation of the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the period 2022–2030 (Official Gazette of the Republic of Serbia, No. 6/2025) are defined under Specific Objective *1:* Ensuring greater involvement of the civil society sector in decision-making processes at all levels of government*,* and Specific Objective 2*:* Improved transparent financing and sustainability of the civil society sector.

Within the framework of Specific Objective 1, in November 2024 the Republic Secretariat for Public Policies established a Working Group for the preparation of amendments to the regulatory framework governing consultations and public debates, comprising representatives of the competent public administration authorities and representatives of civil society organisations selected through a public call. Based on the proposals of the Working Group concerning amendments to the Rules of Procedure of the Government, in the part relating to public consultations, and in line with the

recommendations of the European Commission, amendments to the Rules of Procedure of the Government were adopted in December 2025. In the forthcoming period, the Working Group will continue its work on the consideration and formulation of recommendations aimed at further improving the regulatory framework for public participation in the process of drafting legislation and public policy documents. Within the same objective, activities were also implemented to strengthen the capacities of public administration bodies for the inclusion of civil society organisations in the drafting, implementation, monitoring of implementation, and evaluation of the effects of public policies and regulations.

Activities implemented under Specific Objective 2: Improved transparent financing and sustainability of the civil society sector are described in the previous section.

During 2026, work is planned on amendments and supplements to the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the period 2022–2030, as well as on the preparation of the Action Plan for the period 2027–2030 for the implementation of the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the period 2022–2030.

On the process of preparing and enacting laws:

- Please update on new developments, since the last JLS subcommittee, regarding the rules and usage of fast-track and emergency procedures, and please give an update on the proportion of decisions that were adopted in 2025 through these procedures compared to the total number of decisions adopted.

National Assembly

In the period from 1 January 2025 to 25 December 2025, the National Assembly adopted 179 laws, 21 of which (11.73%) were adopted under urgent procedure and 158 (88.27%) under regular procedure.

In the same time period, 75 other acts were adopted, 49 of which (65.33%) were adopted under urgent procedure and 26 (34.67%) under regular procedure.

General Secretariat of the Government

In 2025. out of a total of 76 bills, the Government sent twenty-seven bills or 35,5% to the National Assembly under the urgent procedure. We note that the number of laws and amendments to the law does not include the number of draft laws on establishing international agreements, treaties.

- Please update in case of new developments regarding the regime for constitutional review of laws within the legal framework.

Ministry of Justice

The Constitution of the Republic of Serbia ("Official Gazette of the Republic of Serbia", No. 98/06 and 16/22) stipulates that the Constitutional Court is an autonomous and independent state body that safeguards constitutionality and legality and human

and minority rights and freedoms. Decisions of the Constitutional Court are final, enforceable and generally binding (Article 166).

According to **Article 167** of the Constitution of the Republic of Serbia, among other things, the Constitutional Court decides on:

1. Compliance of laws and other general acts with the Constitution, generally accepted rules of international law and ratified international treaties,

2. Compliance of ratified international treaties with the Constitution,

3. Compliance of other general acts with the law,

4. Compliance of the statute and general acts of autonomous provinces and local self-government units with the Constitution and the law,

5. Compliance of general acts of organisations with delegated public powers, political parties, trade unions, civil associations and collective agreements with the Constitution and the law.

Article 168 of the Constitution prescribes:

"A proceeding of assessing the constitutionality may be initiated by state bodies, bodies of territorial autonomy or local self-government, as well as at least 25 MPs.

The procedure may also be initiated by the Constitutional Court. Any legal or natural person shall have the right to an initiative to start a proceeding of assessing the constitutionality and legality.

The law or other general acts which is not in compliance with the Constitution or the law shall cease to be effective on the day of publication of the Constitutional Court's decision in the official journal. Before passing the final decision and under the terms specified by the law, the Constitutional Court may suspend the enforcement of an individual general act or action undertaken on the grounds of the law or other general act whose constitutionality or legality it assesses.

The Constitutional Court may assess the compliance of the law and other general acts with the Constitution, compliance of general acts with the law, even when they ceased to be effective, if the proceedings of assessing the constitutionality have been initiated within no more than six months since they ceased to be effective."

Article 169 of the Constitution prescribes:

"At the request of at least one third of MPs, the Constitutional Court shall be obliged within seven days to assess constitutionality of the law which has been passed, but has still not been promulgated by a decree.

If a law is promulgated prior to adopting the decision on constitutionality, the Constitutional Court shall proceed with the proceedings as requested, according to the regular proceedings of assessing the constitutionality of a law.

If the Constitutional Court passes a decision on non-constitutionality of a law prior to its promulgation, that decision shall entry into force on the day of promulgation of the law.

The proceedings of assessing constitutionality may not be instituted against the law whose compliance with the Constitution was established prior to its entry into force."

The Law on the Constitutional Court ("Official Gazette of the Republic of Serbia", No. 109/07, 99/11, 18/13 - decision of the US, 103/15, 40/15 - other Laws, 10/23 and 92/23) stipulates that the organization of the Constitutional Court, the procedure before the Constitutional Court and the legal effect of the decisions of the Constitutional Court are regulated by this law (Article 1). The Constitutional Court decides on issues within its jurisdiction set up by the Constitution of the Republic of Serbia and performs other duties defined by the Constitution and the law (Article 2).

The Constitutional Court

The Constitutional Court, in accordance with the Constitution, decides on the compatibility of laws and other general acts with the Constitution, generally accepted rules of international law, and ratified international treaties.
The procedure for assessing the constitutionality or legality of general acts is prescribed by the Law on the Constitutional Court and the Rules of Procedure of the Constitutional Court. Neither the Constitution of the Republic of Serbia, the Law on the Constitutional Court, nor the Rules of Procedure of the Constitutional Court prescribe specific deadlines within which the Court should act in the process of assessing the constitutionality or legality of general acts. The Constitutional Court, through a quarterly work plan, which is adopted at a session of the Constitutional Court (comprising all the Court's judges), determines which cases will be resolved during that planning period, particularly taking into account the date of receipt of the submission on which the case is based, and acts accordingly, including when it comes to cases assessing the constitutionality or legality of general acts.

National Assembly

At its sitting held on 18 March 2025, the Committee on Constitutional and Legislative Issues considered request IUz-123/2023 of 23 October 2024 submitted by the Constitutional Court, regarding the initiative to assess the constitutionality of provisions of Article 2, points 3, 5 and 10, Articles 6, 9 and 14 and Article 16, point 1 of the Law on Archival Material and Archival Activities (Official Gazette of the RS, No. 6/20), as well as of provisions of this Law in its entirety, and submitted an opinion to the Constitutional Court on 18 March 2025.

- Please update in case of new developments regarding the framework and use of impact assessments, evidence-based policy-making, public consultation, and measures ensuring transparency and quality throughout the legislative process in the preparatory, parliamentary and implementation phases (including guidance on how to implement

legislation). Please include updates on the working group tasked to amend the legislation on public consultations.

National Assembly

Transparency of the National Assembly is ensured through the public nature of its work, both at NA sittings and sittings of parliamentary committees. NA sittings are broadcast directly by the public service broadcaster, as well as on the NA website, and sittings of parliamentary committees are broadcast on the NA website.
In addition to discussing draft laws at committee sittings, parliamentary committees hold public hearings for the purpose of public consultation (13 public hearings were held in 2025).

Public Policy Secretariat

A Regulation for regulatory impact assessment has been adopted on March 6, 2025 and applies as of March 31, 2025. The abovementioned regulation defines the methodology for ex-ante RIA by further defining cost-benefit comparisons, improving implementation and monitoring plans, and formally linking the RIA report questionnaire with specialized tools like the SME test, administrative cost calculator, competition impact checklist, and gender equality test. The regulation further outlines specifics for RIA of regulations harmonizing with EU legislation and formalizes the methodology for ex-post impact assessment. Furthermore, the regulation introduces specific guidelines for ex-ante RIA regarding EU-harmonizing legislation and formalizes the methodology for conducting ex-post impact assessment.

RIA statistics for laws and regulations:
I Adopted laws:

During the course of 2025, National Assembly adopted a total of 179 laws. According to the PPS' data, for 59 laws it was necessary to have a RIA report. Out of 59 laws[1], 25 laws had complete RIA, 23 laws had partial RIA and for 6 laws RIA was insufficient.

II Adopted regulations:

During the course of 2025, Government of Serbia adopted a total of 199 regulations. According to PPS' data, for 83 regulations it was necessary to have a RIA report. Out of 83 regulations[2], 47 regulations had complete RIA and 22 regulations had partial RIA.
Public consultation and updates on the working group tasked to amend the legislation on public consultations:
During the course of 2025, the PPS continued to provide support to public administration authorities in terms of usage of the "e-Consultation" Portal.

[1] PPS remark: There is no data for 5 laws.

[2] PPS remark: There is no data for 14 regulations.

Statistical data on conducted consultations for adopted laws:
For 51% of adopted laws by the National Assembly in 2025, consultations had been conducted (38/74). Out of 74 laws, for 22 laws consultations had been conducted on the "e-Consultations" Portal (29.7%).

Statistical data on conducted consultations for adopted regulations:
For 30% of adopted regulations by the Government of Serbia in 2025, consultations had been conducted (60/199). Out of 199 regulations, for 9 regulations consultations had been conducted on the "e-Consultations" Portal (4.5%).

Statistical data on conducted consultations for adopted public policy documents (PPDs):
For 84.6% of adopted PPDs by the Government of Serbia in 2025, consultations had been conducted (11/13). Out of 13 PPDs, for 8 PPDs consultations had been conducted on the "e-Consultations" Portal (61.5%).
Key activities on improvement of regulatory framework have been conducted through Working Group for the preparation of amendments to the legal framework for consultations and public debates (Working Group), which has been set up and which includes the representatives of relevant state administration authorities, as follows:

- Ministry of public administration and local self-government,
- Secretariat for legislation,
- General secretariat of the Government,
- Ministry of human and minority rights and social dialogue,
- Ministry of european integration,
- Ministry of environmental protection,
- Ministry of construction, transport and infrastructure,
- Office for IT and E-Government,
- Chamber of Commerce of Serbia and
- Public Policy Secretariat,

as well as representatives of civil society organizations (CSOs) selected through a public call:

- European policy center,
- National association of local authorities in Serbia,
- Center for Democracy Foundation and
- Belgrade Open School.

The first result of the Working Group has been the amendment of the Government's Rules of Procedure (RoP) in accordance with the obligations arising from the Reform Agenda. Article 41g of the RoP stipulates that the conclusion on the implementation of a public debate for regulations and PPDs, the program of the public debate and the deadlines for its implementation -- shall be adopted by the Government, instead of Government committee.
During the course of 2026, the Working Group shall continue to work on simplifying the legal framework by considering the best possible solutions, taking into account the recommendations of the European Commission and SIGMA.

- Please inform on safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.

Ministry of Justice

The Rules of Procedure of the Government prescribe a clear procedure for drafting the law and its adoption by the Government, with the following articles:

Article 39

A rationale for a draft law and a proposal of regulation/decision of the Government shall include the following:

1) A constitutional/legal basis for the adoption of the act;

2) Reasons for the adoption of the act and, more specifically, the problems to be solved by the act, the objectives to be met by the act, possibilities that have been considered already to solve the problem without the adoption of the act and the answer to the question why the adoption of the act is the best way to solve the problem;

3) The explanation of basic legal institutes and individual solutions;

4) The estimate of financial resources necessary for the implementation of the act;

5) The general interest for which retroactivity has been suggested, if the draft law includes retroactivity provisions;

6) Reasons for the adoption of the law as a matter of urgency, if emergency procedure has been suggested for the adoption of the law;

7) Reasons for the stipulation that the act should come into force before an eight-day deadline running from the publication of the law in the *Official Gazette of the Republic of Serbia*;

8) A review of the provisions of the act in force that are being amended, (which is prepared by crossing out the part of the text that is being amended, and writing the new text in capital letters).

Article 39a

Along with the draft law and the proposed regulation, the proposer shall submit as attachments a Statement on the compliance of regulations with European Union regulations and a Table of compliance of regulations with European Union regulations, on the forms established by a special act of the Government.

The Statement on the compliance of regulations with European Union regulations and the Table of compliance of regulations with European Union regulations shall also be submitted with the

draft decision harmonizing the regulations of the Republic of Serbia with the regulations of the European Union.

Along with the draft law and the proposed regulation or decision, the proposer shall submit as attachments a statement with which strategic document of the Government (strategy, action plan, etc.) the proposed act is aligned, as well as a statement whether the draft law, or the proposed regulation or decision is planned in the annual work plan of the Government, and in the event that the act is not planned in the annual work plan of the Government, which shall also contain an explanation of the reasons indicating the necessity of considering that act.

Along with the draft law and the proposed regulation or decision, as well as with the draft development strategy and the draft Fiscal Strategy, the proposer shall submit as attachments a statement on the cooperation achieved, or obtaining opinions from authorities, organizations and bodies that, according to special regulations, provide opinions on drafts, or proposals of those acts.

The statement referred to in paragraph 4 of this Article shall contain information on the authorities, organizations and bodies with which cooperation has been achieved, or from which authorities, organizations and bodies, in accordance with special regulations, opinions have been obtained, with a note on whether the comments of those authorities, organizations and bodies have been accepted, and in the event that certain comments have not been accepted, the statement shall also state the reasons for not accepting those comments. The opinions of the authorities, organizations and bodies referred to in paragraph 4 of this Article shall be submitted with the statement.

If an authority, organization or body referred to in paragraph 4 of this Article fails to submit its opinion within the deadline referred to in Article 47 of these Rules of Procedure, the proposer is no longer obliged to obtain that opinion, but is obliged to state the information to that effect in the statement referred to in paragraph 4 of this Article.

If the obligation to cooperate, or obtain an opinion, within the meaning of paragraph 4 of this Article, is not provided for by special regulations, the proposer shall state this in the statement referred to in paragraph 4 of this Article.

Article 40*

As an annex to the draft law, the proponent shall also provide the analysis of the effects of the law, including the following explanations: Whom the law will affect most and how? Will the costs of its implementation affect the citizens of Serbia and its economy (small and medium-sized enterprises in particular)? Are the positive effects of the law such as to justify the costs it will create? Will the law support the creation of new economic subjects on the market and boost competition? Were the interested parties given an opportunity to state their opinion on the law? What measures will be taken during the implementation of the law to materialize its intents and purposes?

If the proponent decides that there is no need to offer the analysis of the effects of the law, a special explanation shall be required.

Together with the draft law, the proponent shall submit an annex listing regulations and other general acts by which the draft law shall be enforced and the deadlines within which the regulations and general acts shall be passed.

Article 41

A public debate is the final stage of the consultation process with the interested public in the procedure for adopting draft laws or public policy documents.

The proposer is obliged to conduct a public debate in the preparation of a law that significantly changes the regulation of an issue or regulates an issue that is of particular interest to the public. A public debate is also conducted in the procedure for preparing public policy documents (strategies, programs, policy concepts, action plans).

A public debate may also be conducted in the preparation of a regulation and decision.

The provisions of these Rules of Procedure shall also apply in the procedure for preparing the Development Plan and Investment Plan, if the procedure for public debate during their preparation is not otherwise regulated by the regulations governing the preparation of the Development Plan and Investment Plan.

The criteria referred to in paragraph 2 of this Article that refer to the obligation to conduct a public debate in relation to laws is fulfilled in the following cases:

1) when preparing a new systemic law (a law that, as a rule, regulates the entirety of social relations in one area);

2) when preparing a new law, unless the Government decides otherwise upon a reasoned proposal from the proposer;

3) when preparing a law on amendments and supplements to a law, if it significantly changes the solutions in the existing law, which the Government decides upon a reasoned proposal from the proposer in each specific case;

4) when preparing a law on the ratification of an international treaty – only if the Government decides to conduct a public debate, upon a reasoned proposal from the Ministry of Foreign Affairs or a state administration body whose scope of activity includes issues regulated by an international treaty.

Conducting a public debate on public policy documents is always mandatory, except in the case of:

1) minor changes to strategies and programs that do not have a high or significant impact on changes to already established public policies;

2) minor amendments to the action plan that change activities in order to implement measures established by the existing strategy or program;

3) adoption of the action plan within 90 days from the date of adoption of the strategy or program.

The decision to conduct or not conduct a public debate regarding a draft law based on the assessment of the criteria referred to in paragraph 5 of this Article, or the public policy document referred to in paragraph 6, items 1) and 2) of this Article, at the proposal of the competent proposer, shall be made by the Government.

The decision to conduct a public debate, the public debate program and the deadline for its conduct shall be determined by the Government, at the proposal of the proposer.

Article 41b

The public debate procedure begins with the publication of a public invitation to participate in a public debate with the public debate program on the e-Consultation Portal and the proposer's website. The public invitation also contains information on the formation and composition of the working group that prepared the draft or proposal of the act that is the subject of the public debate.

The public debate program must contain: the draft or proposal of the act that is the subject of the public debate with the explanation and attachments established by these Rules of Procedure, the deadline for conducting the public debate, important information about the activities planned within the public debate (holding round tables, forums, address and time of their holding, etc.), the method of submitting proposals, suggestions, initiatives and comments, as well as other data important for its implementation.

The deadline for submitting initiatives, proposals, suggestions and comments in written or electronic form lasts for the duration of the public debate.

The public debate lasts at least 20 days.

If the proposer fails to conduct a public debate, which was mandatory, the Government shall postpone the consideration of the act and shall issue a conclusion ordering the proposer to prepare and propose a public debate program.

The proposer who fails to conduct a public debate according to the program set by the Government shall be obliged to conduct the public debate in full.

Article 41c

After the public debate has been conducted, the competent proposer shall prepare a report on the conducted public debate and publish it on the "e-Consultation" Portal and the proposer's website, no later than 15 working days from the date of completion of the public debate.

The report referred to in paragraph 1 of this Article shall, in particular, contain information on:

1) the manner, time and place of holding the public debate;

2) the participation of citizens, civil society organizations, business entities, scientific and research organizations, state, provincial and local authorities and organizations and other entities in the public debate;

3) the manner in which the suggestions were incorporated into the draft law or draft or proposal of a public policy document and, if not, for what reasons this was not done.

An integral part of the material for consideration at a Government session, attached to a draft law, other regulation or act or public policy document that the Government considers after the public debate, shall also include a consolidated report on consultations and a report on the public debate, which for these purposes shall be renamed a report on public participation in the preparation of a specific regulation or public policy document.

Article 41d

Laws and public policy documents proposed by the Government to the National Assembly shall be submitted to public debate in the form of draft acts and the Government shall consider them for the purpose of adopting the proposals after conducting a public debate.

Other regulations and public policy documents adopted by the Government shall be submitted to public debate in the form of draft acts, and the Government shall consider them for their adoption after conducting a public debate.

The Government shall decide on a public debate by conclusion.

The proposer shall obtain the opinions of the Ministry of Finance, the Republic Secretariat for Legislation and the Republic Secretariat for Public Policies on the draft conclusion on the adoption of the public debate program or on the non-conduct of a public debate.

Article 41e

The proposer is obliged, if during the public debate comments, contributions and suggestions are received from other entities - participants in the public debate, concerning issues directly related to the scope of work of the bodies and organizations referred to in Articles 39a and 46 of these Rules of Procedure, to cooperate with these bodies and organizations and jointly consider open issues during the public debate.

Article 42

If conducting a public a debate is not a mandatory requirement, the latest the material shall be made available to the public is when the competent committee issues a conclusion proposing that the Government should adopt an act or establish a draft act.

Article 46

The proponent shall obtain the opinion of the Legislation Secretariat of the Republic of Serbia and the Ministry of Finance on draft laws and proposed regulations, decisions, Fiscal Strategy, development strategies, declarations and conclusions.

The proponent shall also obtain the opinion of the Ministry of Foreign Affairs if the act pertains to relations between the Republic of Serbia and foreign countries, the opinion of the Ministry of Justice if the act prescribes criminal acts, commercial crimes or misdemeanors, or if it

establishes or removes jurisdiction or stipulates subject matter jurisdiction of courts, and the opinion of the State Attorney's Office if the act prescribes the protection of property rights and interests of the Republic of Serbia or creates contractual obligations for the Republic.

Opinions shall be also obtained from the state administration bodies whose competence includes the subject matter of the act.

The proposer shall also obtain the opinion of the Office for European Integration on the draft law and the proposed regulation or the proposed decision harmonizing the regulations of the Republic of Serbia with the regulations of the European Union, in particular on whether the Statement on the Compliance of Regulations with the Regulations of the European Union and the Table of Compliance of Regulations with the Regulations of the European Union have been correctly completed. The opinion of the Office for European Integration shall also be obtained on the draft development strategy.

The opinions of the competent state administration bodies on the draft law on ratification of an international treaty shall be obtained by the state administration body whose scope of work includes the issues regulated by the international treaty.

The opinion of the Republic Secretariat for Public Policies shall be obtained on the draft law and the proposal for the Fiscal Strategy and Development Strategy, as well as on the analysis of the effects of the law, which, in accordance with the provisions of these Rules of Procedure, is submitted with the draft law. If the proposer assesses that the analysis of the effects of the law should not be attached to the draft law, he shall be obliged to obtain the opinion of the Republic Secretariat for Public Policies on this matter.

The proposer shall be obliged to request the opinion of the authorities, organizations and bodies that are authorized to provide opinions in accordance with special regulations and shall be responsible for acting in the manner referred to in Article 39a, paragraphs 4–7. of these Rules of Procedure.

The accompanying letter seeking an opinion shall be signed by a minister, a state secretary, director of a special organization, director of a government service or their deputies.

Article 51

The material the General Secretariat delivers to the competent committee shall be included in the agenda of the next session of the committee, unless the chairperson of the committee decides otherwise.

At the session, the positions of the proponent shall be brought into conformity with the remarks from the opinions obtained, objections and suggestions by members of the committee.

After that, the committee shall create a report for the Government, which, inter alia, shall include the conclusion that the Government should or should not pass an act, i.e. establish a draft act or not, separate opinions by members of the committee and controversial issues.

With the consent of the proponent, the committee may adopt the conclusion that the proponent should confirm his positions to the position of the committee after the session and another

conclusion that the consideration of this item of the agenda shall be postponed until the positions on controversial issues have been reconciled.

Article 70

If the Government sponsors an act before the National Assembly, it shall designate a member of the Government to represent it at the session of the National Assembly. Director of the Legislation Secretariat of the Republic of Serbia may be a government representative under the terms specified by the Rules of Procedure of the National Assembly.

From amongst its employees and appointees who prepared the draft act and possess necessary expertise, the Government may designate its representatives to take part in the work of the National Assembly's committee.

A representative of the Government may, at a session of the National Assembly, reject any amendment proposed by another proposer without the Government's opinion.

A representative of the Government may, at a session of the National Assembly, accept an amendment proposed by another proposer without the Government's opinion only if it does not significantly change the solutions in the draft Government act and if he has obtained positive opinions for this from the General Secretariat, the Republic Secretariat for Legislation and the Office for European Integration, and at their request, from the ministries or other state administration bodies with whose competences the issues to which the amendment being accepted relates are related.

If a member of the Government is unable to attend the National Assembly session, the Prime Minister shall appoint another member of the Government to replace him/her, if it is impossible to wait until the next government session to appoint the replacement then.

Article 71

If the Government sponsors an act before the National Assembly, proposed amendments to the draft act shall be prepared by a competent ministry or a special organization in collaboration with the Legislation Secretariat of the Republic of Serbia.

If amendments to the draft act have been filed by other proponents, the General Secretariat shall deliver them to the competent ministry or special organization, which shall work together with the Legislation Secretariat to prepare for the Government a draft opinion on the amendments. They shall state in the draft opinion which amendments have been accepted and which have not, also providing a rationale.

In all other aspects the Rules of Procedure pertaining to the preparation of material for a government session shall apply accordingly.

Article 72

If the Government does not sponsor an act before the National Assembly, the competent ministry or a special organization shall work in collaboration with the Legislation Secretariat

to prepare for the Government a draft opinion on the draft act, draft amendments and a draft opinion on amendments filed by other proponents.

The same shall apply to the preparation of a reply to the Constitutional Court following an initiative/motion for the constitutional review of a general act of the National Assembly or the Government.

In all other aspects the Rules of Procedure pertaining to the preparation of material for a government session shall apply accordingly.

Article 73

If a parliamentary question has been forwarded to the Government and falls within the scope of a ministry, the ministry shall prepare for the Government a draft reply.

If a parliamentary question has been forwarded to the Government and falls within the scopes of several ministries, the General Secretariat shall deliver the question to all of them, but the principal ministry shall prepare a reply for the Government.

The ministries designated by the Prime Minister shall work together with the General Secretariat and the Legislation Secretariat to prepare for the Government a draft reply to a parliamentary question related solely to the work of the Government.

The General Secretariat shall see to it that the Government provides timely replies to parliamentary questions.

Ministry of Human and Minority Rights and social Dialogue

The Ministry of Human and Minority Rights and Social Dialogue, within its competence, undertakes measures to guarantee the implementation of legislative provisions in the field of combating discrimination, including the implementation of the Law on the Prohibition of Discrimination and the Law on the Protection of the Rights and Freedoms of National Minorities. In the reporting period, the Ministry continued its activities of drafting and implementing strategic planning documents that improve the position of national minorities, Roma men and women, gender equality and the development of anti-discrimination policies.
With the aim of becoming better acquainted with the functioning and work of administrative districts and local self-government units in the field of improving the protection of human and minority rights, implementing anti-discrimination legislation and implementing strategic documents, especially considering the position of socially and economically vulnerable groups and members of minority communities, such as Roma, persons with disabilities, children and the elderly, the Minister for Human and Minority Rights and Social Dialogue, Mr. D. Berisha, visited nine (9) administrative districts and all municipalities during 2025. During the visits, 14 social dialogues were organized on various topics of importance to local communities, which were attended by several thousand representatives of state bodies, local self-government units, public institutions, associations and organizations of the civil society and interested citizens.
I n accordance with the provisions of the Law on the Planning System of the Republic of Serbia, a Report on the Implementation of the Strategy for Prevention and Protection against

Discrimination for the period 2022-2030 was prepared. This report covers the implementation of the first Action Plan for 2022 and 2023, as well as activities carried out by the Department for Anti-Discrimination Policy in 2024.
Following the preparation of the Report, which is publicly available on the Ministry's website https://minljmpdd.gov.rs/wp-content/uploads/2025/07/Izvestaj-o-sprovodjenju-Strategije-AD-za-period-2022-2024.pdf, the process of revising the Strategy was initiated, along with the development of an Action Plan for the implementation of the Strategy for 2026 and 2027.
The guarantee of effective protection against discrimination is the fact that the Anti-Discrimination Law established the Commissioner as an independent state body, and that a new commissioner was appointed to the position in December 2025, without any interregnum. Protection against discrimination is also guaranteed by the independent judiciary.

2. The action plans for Chapters 23 and 24 (*including coordination mechanisms, monitoring, reporting, early warning mechanism and involvement of civil society*)

- Please inform on your plans to update the action plans for chapters 23 and 24 which expired at the end of 2023.

Ministry of Justice

Preparatory activities have started for drafting the new Action Plan for Chapter 23, which should address all the necessary activities for the fulfilment of interim benchmarks. Adoption of this strategic document is expected in the first half of 2026. The Ministry of Justice will consult the European Commission in the drafting process. Online meetings on this topic between the Ministry of Justice, as coordinator for Chapter 23, and the European Commission were held on 30 September 2025, 17 October 2025 and 19 December 2025.

Ministry of Interior

The Self-Assessment Report on the fulfilment of the IBMs was first submitted to the European Commission in December 2023. The European Commission provided its comments in June 2024. Following these comments, the Report was revised and resubmitted to the European Commission on January 6, 2025. This submission included a list of critical transitional benchmarks—those that have not been met—, and we anticipate that they will be part of the benchmarks required for the closure of Chapter 24. The purpose of this Self-Assessment Report was to assist the Republic of Serbia in obtaining the benchmarks necessary for the closure of Chapters 23 and 24.
The European Commission has provided the Republic of Serbia with a list of "critical activities and shortcomings" that should be prioritized. A set of measures has also been outlined to address these issues and meet the IBMs. In summary, this document outlines the activities that need to be implemented.
Out of 41 IBMs for Chapter 24, we received 21 comments, resulting in 14 IBMs that still require attention. This represents an improvement from previous assessments, which covered all transitional benchmarks and necessitated the submission of extensive additional materials and data. All identified activities that need to be implemented have already been included as recommendations in the Report on the Progress of the Republic of Serbia in its negotiations for accession to the European Union, so they do not represent new requirements.
In the last quarter of 2025, three video conferences were held between representatives of the broader Negotiating Group and the European Commission, where these activities and further implementation plans were discussed.

The Negotiation group is currently working to align the working tables provided by the European Commission, after which we will decide on the next steps.
In the coming days, a semi-annual report on the implementation of the revised action plan for Chapter 24 will be prepared, along with the tracking record tables, and submitted to the European Commission.

- Please inform on whether the coordination mechanism for Chapter 23 is still operational (in terms of, for example, the number of meetings held during 2025) and whether you still use the early warning mechanism.

Ministry of Justice

The Ministry of Justice has informed the European Commission of the fact that the revised Action Plan for Chapter 23 expired. In accordance with the European Commission's comments on the first version of the Self-Assessment Report on Interim Benchmarks, the updated version of the Self-Assessment Report was prepared and sent to the European Commission for its review, along with the GAP Analysis on the required activities to be conducted in order to get the IBAR. The new steps were agreed with the European Commission when discussing the updated versions of the document, as well as the GAP analysis. Online meetings on this topic between the Ministry of Justice, as coordinator for Chapter 23, and the European Commission were held on 30 September 2025, 17 October 2025 and 19 December 2025. Having in mind these consultations and the European Commission's comments, the latest version of the Self-Assessment Report was sent to the European Commission on 17 December 2025.

The Early Warning Mechanism (EWM) report was prepared in December 2021 and improved in March 2022 on the basis of reports submitted by the institutions. The Report provides detailed explanations on the causes of delays in certain activities and implementation plans for the period to come.

Eleventh meeting of the Coordination Body for the Implementation of the Action Plan for Chapter 23: Judiciary and Fundamental Rights was held on 26 December 2023. Latest Report on the Early Warning Mechanism was prepared and presented to the members of the Coordination Body on 26 December 2023.

Eight semi-annual reports on the implementation of the revised Action Plan for Chapter 23 for the European Commission were prepared and published (in January 2021, July 2021, January 2022, July 2022, January 2023, July 2023, January 2024, July 2025) in English, as well as 11 quarterly reports on implementing the revised Action Plan for Chapter 23 in Serbian and English. All reports are available on the website of the Ministry of Justice. An Annual report that consists of 2 semi-annual reports for 2024 was prepared and published on the website of the Ministry of Justice in January 2025.

Through the project "Support to the Ministry of Justice for Chapter 23 and Preparation for Budget Support", EU funds provided support to the reporting process and also organized trainings for contact points and members of the Coordination Body, with the aim of further improving the process and quality of reporting. In May and June 2023, two cycles of trainings were held, which were based on issues of the reporting procedure, more precisely reporting according to the Early Warning Mechanism, problems related to the Self-Assessment Report on the fulfilment of Interim Benchmarks, as well as the process of reporting on related strategic documents.

- Please inform on whether a similar monitoring and reporting mechanism has been extended to Chapter 24.

Ministry of Interior

Serbia is effectively monitoring the implementation of its Action Plan for Chapter 24, along with other relevant documents related to Chapter 24 and the EU's Common negotiation position for Chapter 24.

The narrower composition of the NG for the Chapter 24 consists of:

- Head of the NG – state secretary, secretary of the Ministry of the Interior or assistant minister of the Interior
- Deputy Head of NG – from the Ministry of the Interior
- Secretary of the NG – assistant secretary of the Ministry
- Deputy Secretary of the NG – Head of the Department for the EU integration within the Secretariat

The broader composition of the NG for the Chapter 24, in addition to representatives of the Ministry of Interior, consists of representatives of the following authorities:

- Ministry of Foreign Affairs
- Ministry of Justice
- The Supreme Public Prosecutor's Office (as well as the Public Prosecutor's Office for Organized Crime)
- Security Information Agency
- Ministry of Finance - Customs Administration
- Commissariat for Refugees and Migration

The working group produces semi-annual reports to the European Commission twice a year. (Report for 2024 will be prepared in I quarter of 2024)

When it comes to the resources, Serbia is actively strengthening its capacities to meet all necessary demands. Related to the finance, Serbia has used a variety of sources to finance its reforms in the CH 24.

- Please inform on consultations with civil society in areas related to Chapters 23 and 24 respectively.

Ministry of Justice

In February 2022, the Strategy for Creating an Encouraging Environment for the Development of Civil Society in the Republic of Serbia was adopted. In September 2022, the Action Plan (2022-2023) was adopted for the implementation of the Strategy for Creating an Encouraging Environment for the Development of Civil Society in the Republic of Serbia for the period 2022-2030. In January 2025, the Action Plan (2025-2026) for the implementation of the Strategy for Creating an Encouraging Environment for the Development of Civil Society in the Republic of Serbia for the period 2022-2030 was adopted.

With regards to the activities of the MoJ, on December 7, 2021, a meeting was held with the National Convention on the European Union, at which the topics for consideration were the rule of law and the position of national minorities.

Additionally, with the support of the EU Project "EU with Justice - Support for Chapter 23", a mechanism for cooperation with civil society was developed, which comprehensively provided guidelines for cooperation between the Ministry of Justice and the non-governmental sector,

which was developed and submitted to the Delegation of the European Union, after whose comments the text of the mechanism was further harmonized.

The Ministry of Justice organized a round table on the topic: "Presentation of plans for the development of a new set of judicial laws and the Action Plan for the implementation of the Judicial Development Strategy for the period 2020-2025", which was held on March 21, 2022. The round table was an opportunity for representatives of professional associations, civil society organizations, the European Union and the Council of Europe to learn more about the plan and process of work on a set of judicial laws, as well as to present their ideas and proposals regarding future work. The organization of the round table was supported by the EU Project "EU with Justice - Support for Chapter 23".

On May 26, 2022, representatives of the Ministry of Justice participated in the regular meeting of the Working Group for Chapter 23 of the National Convention on the European Union (NCEU) where, among other things, the conclusions from the Report on the implementation of the revised Action Plan for Chapter 23 for the second quarter of 2022 were presented. Also, on September 23, 2022, the first drafts of the set of judicial laws were presented to the National Convention's Chapter 23 Working Group.

The Ministry of Justice organised a round table with the Working Group of the National Convention on the European Union for Chapter 23 as part of the public hearing for the set of judicial laws on January 10, 2023. Additionally, within the existing mechanism of cooperation with civil society organizations, a round table was organised with the Working Group for Chapter 23 of the National Convention on the European Union on May 9, 2023 with the support of the project "Support to the Ministry of Justice for Chapter 23 and preparation of budget support". The topic of this meeting was the sub-chapter "Fundamental rights", with a focus on the rights of minorities and the LGBTQI+ community, as well as the protection of personal data.

In addition, in 2022, the Ministry of Justice conducted two public calls to civil society organizations, in cooperation with the Ministry of Human and Minority Rights and Social Dialogue:

- Public call to civil society organizations to participate in the Working Group for the preparation of the National Anti- Corruption Strategy for the period from 2023-2028 and the accompanying Action Plan for the period from 2023-2028, which was conducted in March;

- Public call to civil society organizations to participate in the Working Group for the development of the Action Plan for the implementation of the National Strategy for the Rights of Victims and Witnesses of Crime in the Republic of Serbia (2020-2025) for the period 2023-2025.

On 26 October 2023, the MoJ organised a meeting with the CSO representatives of the National Convention on the European Union and its Working Group for Chapter 23 with the support of the Project “Support to the Ministry of Justice related to Chapter 23 and Preparations for Budget Support”. The purpose of the meeting was to listen to the representatives of the CSOs and discuss their views on the important points in the context of the fulfilment of interim benchmarks.

Furthermore, another meeting with the representatives of the NCEU took place on 21 December 2023 which regarded the work on the criminal legislation. More specifically, the representatives of the MoJ, along with the members of the Working Group for drafting Criminal Code, as well as the members of the Working Group for drafting Criminal Procedure Code discussed the progress made in this field with the representatives of the CSOs. The purpose of the meeting was to listen to the representatives of the CSOs and discuss their views on the important points in the context of the changes and amendments of the Criminal Code and the Criminal Procedure Code.

Upon drafting the Criminal Code and Criminal Procedure Code, public debate was held in the period October 1st – November 1st 2024. In the same period, public consultations were held regarding the Law on Judicial Academy. Within it, in 2024 four round tables for Draft Law on Amendments and Supplements to the Criminal Code and Draft Law on Amendments and Supplements to the Criminal Procedure Code were organized (October 9th in Niš, October 16th in Kragujevac, October 23rd in Novi Sad and October 30th in Belgrade). As a result of the interest of the general public, it was decided to organize another round of public debate. The public debate was held in the period from 10 September to 1 October 2025.

Also, in 2024 four round tables were organized aiming to discuss the Draft Law on Judicial Academy (October 10th in Nis, October 17th in Kragujevac, October 24th in Novi Sad and October 31st in Belgrade). It is of great importance to stress that representatives of Judges' Association of Serbia, Prosecutors' Association of Serbia, Association of Judges of Misdemeanour Courts of the Republic of Serbia, Association of Judges and Prosecutors of Serbia and Judges' Forum of Serbia were actively included as the members in the Working Group for drafting the Law on Judicial Academy as well as the other CSO representatives including representatives of the National Convention on the European Union's Working Group for Chapter 23 who were included as observers.

In 2025 public debates were held for the following strategic documents and draft laws:

- for the Draft Law on Amendments and Supplements to the Law on Seizure and Confiscation of the Proceeds from Crime the public debate was held in the period from May 21st 2025 to June 10th 2025;

- for the Draft Law on Amendments and Supplements to the Law on Juvenile Offenders and Criminal Protection of Juveniles the public debate was held in the period from September 10th 2025 to October 1st 2025;

- for the new Action Plan for the Implementation of the National Anti-Corruption Strategy the public debate was held in the period from September 24th 2025 to October 13th 2025;

- for the Operational Plan for Financial Investigations the public debate was held in the period from October 22nd 2025 to November 10th 2025;

- for the Draft Law on Amendments and Supplements to the Law on Prevention of Domestic Violence the public debate was held in the period from November 12th 2025 to December 2nd 2025.

In 2025 calls were also published on the website of the Ministry of Justice and the e-consultation portal for all interested parties to submit their comments, proposals and suggestions, as part of the consultative process regarding the upcoming development of the following strategic documents:

- National Strategy for the Rights of Victims and Witnesses of Crime in the Republic of Serbia with the accompanying Action Plan,

- Operational Plan for Financial Investigations,

- new Action Plan for the Implementation of the National Anti-Corruption Strategy and

- Judicial Development Strategy.

A Public call was issued for civil society organizations to submit candidacies for membership in the Working Group for drafting the new National Strategy for the Rights of Victims and Witnesses of Crime in the Republic of Serbia with the accompanying Action Plan. The Public call lasted from November 14 to November 28, 2025. One civil society organization that submitted its application and was elected was the Centre for Missing and Abused Children.

The CSOs which are part of the Working Group for the development of the Draft Action Plan for the period 2026-2028 for the implementation of the National Anti-Corruption Strategy for the period 2024-2028 are: the Standing Conference of Towns and Municipalities, the National Alliance for Local Economic Development, the Council of Foreign Investors, the Institute for Corruption Research "Kareja" and "Transparency Serbia".

Ministry of Interior

Recognizing the pivotal role of civil society in European integration, Serbia is committed to strengthening its cooperation with CSOs.

As mentioned in the previously submitted Self-Assessment Report, the last plenary meeting with civil society organizations and the negotiating group for Chapter 24 took place on October 5, 2023.

As we look ahead to the parliamentary elections in December 2023 and the process of forming a new government, it's important to note that the negotiating group has not had the chance to meet with civil society organizations during this time. We appreciate everyone's understanding and look forward to engaging in discussions soon.

The Ministry of the Interior officially reached out to the National Convention on the European Union (NCEU), which comprises civil society organizations, to propose consultations for drafting a new Law on Interior in the second half of August. On August 14, the NCEU responded by suggesting that the meeting be postponed to September, conditional on our commitment to raising standards and practices related to the prohibition of torture, accountability guarantees, and the operational independence of the police to the highest level.

In their response, the NCEU also proposed a specific date for the meeting in September. In response to this, we sent a new document to the NCEU expressing our readiness to hold the meeting in September. However, the NCEU declined again, stating that they do not wish to participate in the meeting and will only engage once the law has entered the public debate phase.

Ministry of Human and Minority Rights and social Dialogue

By Government Decision of 7 August 2025, a new composition of the Council for Monitoring the Implementation of United Nations Human Rights Recommendations was appointed. A call for proposals for appointment/reappointment was sent to all departments that previously had appointed members and deputy members (22 departments) in the Council under the prior decision. As with the formation of previous Council compositions, a call for appointments was also sent to the Platform of Civil Society Organizations for Cooperation with UN Human Rights Mechanisms. On 4 February 2025, the Platform decided to suspend cooperation with the Council. This decision was confirmed on 18 June 2025 by the Program Director of the Belgrade Centre for Human Rights, who represented the Platform in the Council.
The twenty-fourth session of the Council was held on 8 December 2025, during which the Work Plan for 2026 was adopted. In addition, the obligations of the Republic of Serbia in the forthcoming period concerning the monitoring and follow-up of the implementation of recommendations of United Nations treaty bodies were presented, particularly given their special importance for the European integration process and for meeting interim benchmarks (including "critical" ones) within negotiating Chapter 23 (the implementation of UN conventions is also reported within the framework of negotiating Chapters 22 and 19).

3. Fundamental rights

3.1. Ombudsman (*implementation of the 2021 law; work and capacity of the institution)*

- Please provide up-to-date information on how the Ombudsman addressed the recommendation in paragraph 10 of the last CPT periodic report of March 2022 (as the published government response to the CPT periodic report dates from March 2022).

Ombudsman

The Protector of Citizens cooperates with a larger number of civil society organisations compared to 2021, involving associations with different expert profiles, including specialists in forensic medicine and psychiatry, special pedagogues and psychologists, and organisations active in various fields relevant to the work of the National Preventive Mechanism (NPM). This cooperation enables a multidisciplinary approach in NPM activities, enhances transparency, and ensures the participation of civil society. A public call for cooperation with civil society organisations in the performance of the NPM mandate is issued every two years. The most recent procedure was conducted in October 2024, following which cooperation continued with previously engaged organisations, and one additional organisation was included, bringing the total number of cooperating organisations to seven. Throughout the cooperation, partner organisations are given the opportunity to point out potential challenges and obstacles, and the Protector of Citizens demonstrates openness to improving the performance of NPM activities.
With regard to monitoring the treatment of persons in police custody, the NPM applies a standard methodology. Prior to visits to police stations, the NPM team conducts confidential interviews in penal institutions with persons deprived of liberty regarding

police conduct during deprivation of liberty, detention and the application of police powers. Where the number of detained persons is limited, interviews are conducted with all detainees present; where the number is higher, the NPM selects detainees considered to be at higher risk of ill-treatment, while always including persons belonging to vulnerable groups, such as women, juveniles and foreign nationals.

During visits to police stations, the NPM reviews detention-related documentation, collects information from police officers, and, where applicable, conducts confidential interviews with detained persons. The NPM also inspects detention premises to assess compliance with prescribed conditions and applicable standards, and, where necessary, examines other premises and documentation, including records on complaints and the use of coercive measures. Following visits, the NPM issues reports containing recommendations aimed at improving the treatment of persons deprived of their liberty. The reports are submitted to the visited institution and the competent ministry, which are invited to provide information on measures taken to implement the recommendations and to engage in dialogue on their implementation. NPM reports and the authorities' responses are published on the website of the Protector of Citizens.

In 2022, the NPM conducted 49 visits to police stations, out of a total of 87 visits to institutions where persons deprived of liberty are or may be held, and issued 94 recommendations addressed to the Ministry of Interior, out of 204 recommendations in total.

In 2023, the NPM carried out 59 visits to police stations, out of 90 total visits, issuing 59 recommendations addressed to the Ministry of Interior, out of 234 recommendations overall.

In 2024, 43 visits to police stations were conducted, out of 74 total visits, and 84 recommendations were addressed to the Ministry of Interior, out of 191 recommendations issued.

In 2025 (as of 25 December), the NPM conducted 35 visits to police stations, out of 85 total visits, issuing 36 recommendations addressed to the Ministry of Interior, out of 120 recommendations in total.

- Please provide up-to-date information on how, respectively, the Ombudsman/the government/the Parliament addressed the 23 Ombudsman-related recommendations of the 2023 peer review on independent bodies, including detailed information on the methodology for tracking the authorities' follow-up to recommendations.

National Assembly

In relation to the TAIEX Peer Review, we indicate that there have been no amendments to Article 138 of the Constitution (the recommendation likely mistakenly refers to Article 135 of the Constitution), nor to the Law on the Ombudsperson which was adopted in 2021.

At its sitting held on 16 of June 2025, the National Assembly adopted annual reports of the Ombudsperson for 2022, 2023 and 2024 and adopted conclusions containing recommendations for improving the situation in the areas to which the reports relate. The recommendations were proposed by the competent parliamentary committees.

A number of parliamentary committees have worked together with the Ombudsperson, and in order to improve this cooperation further, chairpersons of committees have held meetings with the Ombudsperson.

Ombudsman

1. Appointment and specialisation of deputies

The Law on the Protector of Citizens allows for the appointment of up to four deputies. Following the expiry of the mandates of previous deputies, a procedure for appointing new deputies was initiated in December 2024 but was subsequently suspended for technical reasons. No new deputies have been appointed to date.

In the absence of appointed deputies, sectoral specialisation is ensured through the internal organisation of the Secretariat, including dedicated departments responsible for child rights, the National Rapporteur for trafficking in human beings, the National Preventive Mechanism and the Independent Mechanism for Monitoring the Implementation of the CRPD.

2. Budget increase

In accordance with the Law on Amendments to the Law on the Budget of the Republic of Serbia for 2024, the budget of the Protector of Citizens amounted to 259,231,000 dinars, representing a 9% increase compared to 2023.

3. Reinforcement of staff and employment conditions

In order to strengthen institutional capacities, recruitment procedures were initiated in November 2024 for several executive positions within the Secretariat, including positions in the departments of the National Rapporteur, the CRPD monitoring mechanism, legal and administrative affairs and communications. A total of five positions were filled. Recruitment continued in 2025 with a new call published in November 2025 for seven additional civil servants across specialised units.

Issues related to staff retention remain a challenge. During the drafting of the new Law on the Protector of Citizens, the institution advocated for the introduction of a legal possibility to increase staff salaries by up to 30%, as a measure to attract and retain qualified personnel. This proposal was not included in the adopted law.

However, the adoption of the new Rulebook on internal organisation and systematisation of job positions in April 2024 contributed to an improvement of the material status of employees, as the new systematisation enabled advancement in professional titles for all employees who met the prescribed requirements. This resulted in a better alignment between employees' qualifications, responsibilities and formal positions within the Secretariat. In line with the Law on the Protector of Citizens, the Rulebook provides for specialised internal units corresponding to the additional mandates assigned to the institution by law and establishes a clearer and more functional internal structure.

4. Normative framework visibility

Information on the relevant normative framework governing the work of the Protector of Citizens is published on the institution's official website.

5. Engagement with civil society and national stakeholders

Engagement with civil society and domestic partners expanded significantly during 2024 and 2025. At the beginning of 2024, the Protector of Citizens signed a cooperation agreement with SOS Children's Villages aimed at strengthening the implementation of the UN Convention on the Rights of the Child. In September 2024, the institution selected seven civil society organisations to participate in the activities of the National Preventive Mechanism, in accordance with obligations under the Optional Protocol to the Convention against Torture.

Cooperation with local self-government units continued through the long-standing partnership with the Standing Conference of Towns and Municipalities on accessibility initiatives. Public outreach was strengthened through the Ombudsman Days campaign, which facilitated direct communication with citizens in multiple municipalities, and

through projects promoting environmental rights, interfaith youth dialogue, inclusive education and access to civil-registry rights.

6. Awareness raising and promotion of human rights

The Protector of Citizens continued to intensify awareness-raising activities throughout 2025, recognizing the need to balance the institution's strong focus on individual complaint investigations with its broader mandate as a national human rights institution. Public knowledge of human rights remains limited, and strengthening the visibility, accessibility and educative function of the institution has become an essential part of its work.

In 2025, the Ombudsman Days campaign continued with visits to Leskovac, Lebane, Čajetina and Temerin. These visits deepened the institution's presence at the local level, strengthened cooperation with municipal administrations and provided citizens with accessible avenues to raise concerns directly with the Protector of Citizens. The continuation of this model throughout 2025 reflects the institution's sustained commitment to improving access to independent oversight across Serbia.

In November 2025, in collaboration with the University for Criminal Investigation and Police Studies and the Institute of Comparative Law Protector of Citizens organized the International Scientific Conference marking 20 years since the adoption of the Law on the Protector of Citizens, an event of particular institutional and symbolic importance. The conference brought together international ombudsman institutions (Bosnia and Herzegovina, Slovak Republic, Azerbaijan, Italy, Turkey, Uzbekistan and the State of Qatar), academics, civil society and public authorities to examine two decades of development of the Ombudsman institution in Serbia and its evolving role in the protection and promotion of human rights.

In December 2025, the Protector of Citizens published the Special Report on the Role of Children and Youth in Environmental Protection, which synthesised findings from field visits, research conducted by CeSID and contributions from the Youth Advisory Panel. Also, the institution marked the 15th anniversary of the Youth Advisory Panel, celebrating a decade and a half of structured youth participation in the institution's work. The anniversary highlighted the Panel's valuable contributions to child-rights promotion, human-rights education and the development of youth-driven recommendations and analyses.

7. Documentation of recommendations and follow-up

A written trail is maintained for all recommendations and follow-up actions, including those resolved informally. Complaint handlers document all communication with public authorities, monitor deadlines for implementation and ensure that complainants are informed of all stages and outcomes of their case. This approach ensures transparency, accountability and consistency across individual case-handling.

8. Methodology for monitoring the implementation of recommendations

The internal mechanism for monitoring the implementation of recommendations, established in early 2023 and significantly strengthened in 2025, now functions as a comprehensive system covering both individual recommendations issued in investigations and general recommendations issued through annual and special reports. The core of this mechanism remains the structured follow-up on individual recommendations. After the expiry of the deadline for implementation, public authorities submit information on the actions taken, accompanied by relevant documentation such as decisions, internal acts, training plans or other evidence of compliance. Complaint handlers systematically monitor deadlines, maintain continuous communication with public authorities and provide additional clarification and guidance when required. In cases where authorities express willingness to implement recommendations once conditions are met, complaint handlers continue to follow-up until implementation occurs. For recommendations attracting wider

public attention or those relevant for international reporting, monitoring continues even after the formal conclusion of the case. Throughout the process, complainants receive timely updates on the status and outcome of the recommendation. If a public authority fails to submit information within the deadline, complaint handlers send urgency notices to ensure the delivery of information.

All information on individual recommendations is entered into a centralised record managed by the Department for Reporting and Analytical Affairs. Complaint handlers submit updated forms detailing the implementation status of each recommendation, which are incorporated into an institution-wide database. This enables comprehensive tracking and analysis of compliance. The Department conducts regular analytical assessments, identifies patterns of implementation and non-implementation, and communicates key findings to the leadership of the institution. Weekly coordination meetings involving the Protector of Citizens, Deputies and Assistant Protectors serve as a forum for resolving obstacles in implementation and for determining additional steps to be taken in cases of delayed or incomplete compliance. The methodology for assessing implementation remains consistent: recommendations are categorised as implemented, partially implemented or not implemented, and the calculation includes cases where authorities acted immediately upon receiving notice of the investigation.

In 2025, this system was expanded to include systematic monitoring of general recommendations arising from the annual report and special reports. In September 2025, the Protector of Citizens issued a coordinated request to all competent authorities for detailed information on the implementation of general recommendations from the 2024 Annual Report and general recommendations issued in five earlier special reports. This is the first comprehensive, multi-annual request of this scope. In parallel, quarterly analytical overviews combining both individual and general recommendations were introduced and are now submitted to seven parliamentary committees. This represents a significant enhancement of parliamentary oversight and strengthens the accountability of public authorities. For the first time, the 2025 Annual Report will include all information submitted by the executive authorities regarding the implementation of general recommendations, together with the Protector of Citizens' independent evaluation of the level and quality of compliance, sectoral trends and identification of persistent challenges. Through these developments, the mechanism for monitoring recommendations has evolved into a robust national system linking investigative follow-up, systemic monitoring and parliamentary scrutiny and is aligned with the highest European standards.

- Please provide updated information on ongoing efforts to reach the target of 106 civil servants, as per chapter 23 action plan, in the Ombudsman's Office.

<u>Ombudsman</u>

In order to strengthen institutional capacities, on 20th November 2024, the Protector of Citizens announced decisions on the filling of job positions in the Secretariat of the Protector of Citizens, namely:

- three positions with the title of senior advisor in the Department of the National Rapporteur for the area of trafficking in human beings,
- two positions with the title of senior advisor in the Department of the Independent Mechanism for monitoring the implementation of the Convention on Persons with Disabilities,

- two positions with the title of senior, that is, junior advisor in the Department for Legal, Personnel and General Affairs,
- one position with the title of senior advisor in the Sector for Media and Communications.
Total of five positions were filled.
Recruitment efforts continued in 2025 with the publication of a new call in November 2025 for the employment of seven additional civil servants across specialised units.

National Assembly

At its 39th sitting, the Committee on Administrative, Budgetary, Mandate and Immunity Issues approved the request of the Ombudsperson to conclude indefinite-term employment contracts with five new persons in 2025. In accordance with Article 27l of the Budget System Law, the Committee approves requests submitted by independent state authorities for approval of additional hiring, provided that the funds for payment of salaries for new employees are secured. For those reasons, the Committee asks that requests be accompanied by the Ministry of Finance's approval of the human resources plan of the entity requesting approval, confirming the availability of funds in the budget of the Republic of Serbia for payment of salaries for the requested number of employees.
Employee turnover and attrition (retirement, etc.) need to be taken into account, and the maximum number reached varies for those reasons.
To date, the Committee has always approved requests for hiring, in line with the aforementioned law.

- Please inform about how and when the issue of the premises of the Ombudsman's Office will be solved, as per chapter 23 action plan.

Ombudsman

The Protector of Citizens continues to operate in the existing premises. At present, the available office space corresponds to the current number of employees and allows the institution to perform its functions without operational constraints.
The issue of long-term premises remains part of the broader framework envisaged under the Chapter 23 Action Plan. The Protector of Citizens remains available to engage with the competent authorities on this matter, should conditions for addressing the issue arise, taking into account institutional needs and available resources.

- Please inform about when the Parliament intends to hold a plenary session on the 2024 annual report of the Ombudsman and of other independent bodies.

National Assembly

At its Fifth Extraordinary Session in 2025, held on 16 June 2025, the National Assembly considered (sitting began on 10 June):
-The Regular Annual Report of the Ombudsperson for 2022 and adopted conclusions whose drafts were submitted by the Committee on the Judiciary, Public Administration and Local Self-Government and the Committee on Human and Minority Rights and Gender Equality in accordance with Article 238 of the Rules of Procedure of the NA;
-The Regular Annual Report of the Ombudsperson for 2023 and adopted conclusions whose drafts were submitted by the Committee on the Judiciary, Public Administration and Local Self-Government and the Committee on Human and Minority Rights and Gender Equality in accordance with Article 238 of the Rules of Procedure of the NA;

-The Regular Annual Report of the Ombudsperson for 2024 and adopted conclusions whose drafts were submitted by the Committee on the Judiciary, Public Administration and Local Self-Government and the Committee on Human and Minority Rights and Gender Equality in accordance with Article 238 of the Rules of Procedure of the NA.

3.2. Protection of national minorities (*including commitments on Roma inclusion under the Poznan Declaration; update on preparing a new 'action plan on the realisation of the rights of national minorities'; minority languages; situation of refugees and IDPs)*

- Please provide an overview of how Serbia has addressed/plans to address the recommendations of the Advisory Committee of the Council of Europe Framework Convention for the Protection of National Minorities (last report of February 2025). We note that the published State reply from July 2025 does not inform on how the recommendations will be addressed but rather disagrees with the majority of the findings. *Considering the link with the IBMs and the need for the Commission to receive structured feedback in view of the future IBAR, please find here below a suggested template to follow up on Council of Europe bodies' recommendations, as also discussed in the Chapter 23 interim benchmarks VTC on 17/10/2025*:

Ministry of Human and Minority Rights and social Dialogue

At its session held on 10 July 2025, the Government adopted the Comments of the Republic of Serbia on the Fifth Opinion of the Advisory Committee on the Framework Convention for the Protection of National Minorities in Serbia. The comments were submitted to the relevant bodies of the Council of Europe for consideration prior to the adoption of the resolution of the Council of Europe's Committee of Ministers on the implementation of the Framework Convention in Serbia, and are also available on the Ministry's website: https://minljmpdd.gov.rs/sektori/nacionalne-manjine/multilateralni-ugovori/okvirna-konvencija-za-zastitu-nacionalnih-manjina/. Resolution on implementation of the FCPNM by Serbia (CM/ResCMN (2025)7) adopted by the Committee of Ministers on 7 November 2025.

Following the meetings of the Special Working Group, a Draft Action Plan for the Realization of the Rights of National Minorities for the period 2026-2029 has been prepared. The Draft Action Plan draws, among other sources, on the recommendations from the Fifth Opinion of the Advisory Committee on the Framework Convention for the Protection of National Minorities, as well as selected recommendations of the Committee of Experts of the European Charter for Regional or Minority Languages and the European Commission against Racism and Intolerance.

In accordance with the Government Conclusion of 12 November 2025 on the text of the Draft Action Plan, a public consultation was conducted from 14 November to 4 December 2025. The Ministry opted for a combined approach, allowing participants not only to submit written comments but also to present their proposals, opinions, and suggestions directly during a public hearing held on 25 November 2025 in Belgrade. The draft text of the Action Plan was forwarded to the European Commission on 18 November 2025 for consultation. However, the European Commission stated that, in coordination with the Council of Europe, it will review the Action Plan text once it has been revised following the completion of the public consultation process. After the conclusion of the public consultation, the Ministry of Human and Minority Rights and Social Dialogue analysed all comments, proposals, and suggestions submitted by participants. Based on this review, a Report on the Conducted Public Consultation

on the Draft Action Plan was prepared and published on the Ministry's website and on the e-Consultations portal. In line with the European Commission's request, the draft text of the Action Plan, prepared after the public consultation, was submitted together with the Report on the Conducted Public Consultation to the European Commission for opinion on 24 December 2025.

Considering this procedure, the timeline for finalizing the Action Plan depends on the receipt of the European Commission's opinion, as only after that will the final text of the Action Plan be prepared and forwarded for further adoption procedures.

The Action Plan is based on seven specific objectives, with measures and activities for their implementation defined for each of these specific objectives: Personal status; Prohibition of discrimination and suppression of hate speech and hate crimes; Culture, media and intercultural dialogue; Use of language and scripts; Education; Democratic participation, representation and participation in decision-making; Economic status of members of national minorities.

Template example for recommendations foll

- What is the status of textbooks provided in minority languages in both primary and secondary education? Could you please provide an update on the missing textbooks referring to the new Catalogue for 2025/2026 school year? Were any new needs assessments prepared by National Minority Councils?

The Ministry of Education

According to the Constitution and other laws in the Republic of Serbia, national minorities have the guaranteed right to education 1) in their native language with the teaching of the subject Serbian as a non-native language, 2) in the Serbian language with the teaching of the subject Mother Tongue with elements of the national minority, or 3) bilingually - in their native and Serbian languages. This spectrum of educational opportunities also includes the preparation of special textbooks in accordance with state, legal regulations and international standards, with the aim of improving the quality of teaching.
The approval of textbooks for national minorities in Serbia is regulated by the Law on Textbooks, the Law on the Foundations of the Education System, and other legal acts.
Textbooks may be prepared by public or private publishers, in cooperation with national councils of national minorities and author teams that may be engaged by both.
The prepared manuscript of the textbook must undergo professional and pedagogical review by the Institute for the Improvement of Education, which is a professional institution and where the text's compliance with the curriculum, linguistic correctness, scientific and professional accuracy, and adaptation to the age of the students are assessed.
The role of the national council in this process is very important. For textbooks in the language of a national minority or for subjects related to their culture and tradition, the national council giv If the reviewers identify shortcomings in the textbook proposal, the manuscript is returned to the author/publisher for revision and, after corrections, it is reconsidered. When the Institute for the Improvement of Education positively evaluates the new edition proposal, the final approval procedure can begin.

If the textbook does not exist in the language of a national minority, it is possible to translate an already approved textbook into Serbian or to adapt the content of a textbook from abroad to the valid teaching and learning plans in the Republic of Serbia. The approval procedure for such textbooks is the same as described above, except that the foreign publisher must also submit a translation of the textbook into Serbian.es a mandatory opinion. Without their consent, the textbook cannot be accepted.

The final decision on the approval of the textbook is made by the Ministry of Education, which considers expert reviews and the opinion of the national council of the national minority, on the basis of which it makes a decision on the approval of the textbook.

The approved textbook is entered into the official Catalogue of Textbooks for Preschool, Primary and Secondary Schools for each school year and only then can it be used in schools. The Catalogue is published by the end of February for the upcoming school year. In addition to the Catalogue, there is also the possibility of publishing its Supplement at the end of August for the same, upcoming school year.

The Ministry of Education has published the Catalogue of Textbooks for Preschool, Primary and Secondary Schools for the 2025/26 school year (see: https://prosveta.gov.rs/wp-content/uploads/2025/02/Katalog-udzbenika-nacionalne-manjine-2025-2026.pdf) and the Supplement to the Catalogue (see: https://prosveta.gov.rs/wp-content/uploads/2025/09/Dopuna-Kataloga-manjine-25-26.pdf).

A total of 1,284 textbook units are available to students who are members of national minorities, of which 839 have been published according to the reformed teaching and learning programs:

Textbooks for the subject Serbian as a non-native language and for other subjects, by national minority language	**Total number of textbooks in the 2024/2025 school year**				**Total number of textbooks in the 2025/2026 school year**				**Total number of reformed textbooks**
	Pres.	**Prim.**	**High.**	**Total**	**Pres.**	**Prim.**	**High.**	**Total**	
Serbian as a non-native language	-	28	8	**36**	-	45	5	**50**	**45**
Albanian language	-	52	4	**56**	-	74	4	**78**	**70**
Bosnian language	12	94	6	**112**	12	125	6	**143**	**95**
Bulgarian language	-	85	31	**116**	-	91	35	**126**	**61**
Bunjevac language from the national culture	-	12	-	**12**	-	12	-	**12**	**10**
Vlach speech from the national culture	-	1	-	1	-	1	-	**1**	**0**
Macedonian language with national culture	-	3	-	**3**	-	3	-	**3**	**0**

Hungarian language	15	126	53	**194**	15	188	56	**259**	**181**
Romani language with national culture	-	6		**6**	-	6	-	**6**	**6**
Romanian language	-	80	24	**104**	-	93	27	**117**	**76**
Ruthenian language	-	76	37	**113**	-	101	38	**139**	**85**
Slovak language	-	93	65	**158**	-	123	67	**190**	**116**
Slovenian language with national culture	-	1	-	**1**	-	1	-	**1**	**1**
Ukrainian language with national culture	-	8	-	**8**	-	8	-	**8**	**0**
Croatian language	1	84	34	**109**	1	106	41	**148**	**92**
Czech language with national culture	-	3	-	**3**	-	3	-	**3**	**1**
TOTAL:	27	753	262	**1.032**	28	977	279	**1.284**	**839**

The table provided clearly shows how many textbooks each national minority in the Republic of Serbia has.

National Councils of National Minorities in Serbia play a significant role in the development of education, as specifically stated in the Law on National Councils of National Minorities ("Official Gazette of the Republic of Serbia", No. 72/2009, 20/2014 - Decision of the Supreme Court, 55/2014 and 47/2018). The law gives them the right to self-determination in the areas of language, culture, education and information and the right to participate in the creation of educational programs, as well as control over their implementation in practice.
Based on the law and by-laws relating to education and upbringing, national councils of national minorities have the right to create the level and quality of education of their population because they can influence: the development of curricula and programs, the approval of textbooks, the selection of teachers and pedagogical assistants, scholarship programs and additional support for students from minority communities, as well as the organization of teaching the mother tongue, history and culture in order to preserve their own identity. Based on the above, it can be concluded that the progress of a particular national minority depends largely on the engagement of the national council. Depending on how much the national council of a national minority advocates for something, a certain result will be achieved. For this reason, an imbalance is created in the level of development of education among different members of national minorities - where the activity of the national council is more pronounced, better quality and greater progress are achieved, in any sphere of social life.

Ministry of Human and Minority Rights and Social Dialogue

Dialogue monitors the state of implementation of minority rights, maintains continuous cooperation with national minority councils, and, through dialogue with them and the

competent line ministries, works to address challenges and any potential shortcomings in the exercise of the rights of national minorities.
It is important to highlight that the Draft Action Plan for the Exercise of the Rights of National Minorities includes a dedicated section on education. Within this section, which was prepared in cooperation with national minority councils and the competent ministry, the envisaged measures and activities are intended to contribute to the improvement of education for national minorities.
Regarding the Mid-Term Report on the Implementation of the Recommendations for Urgent Action of the Committee of Experts of the European Charter for Regional or Minority Languages, adopted by the Government on 11 April 2025, the Committee of Experts submitted a list of additional questions. The report is publicly available on the Ministry's website https://minljmpdd.gov.rs/sektori/nacionalne-manjine/multilateralni-ugovori/evropska-povelja-o-regionalnim-ili-manjinskim-jezicima/. The Ministry is currently preparing responses to these questions.

- What efforts are invested to improve the quality of teaching the subject of Serbian as a non-mother tongue (standards, curriculum and textbooks in place) and to strengthen the teachers' competencies for teaching the subject?

The Ministry of Education

Teaching Serbian as a non-native language has a long tradition in our multinational and multilingual environment. It is intended for students who are taught in one of the eight languages of national minorities. This subject began to be taught immediately after World War II. The goals set even then reflected the aspiration that is still present today – productive mastery of the Serbian language and training for everyday communication.
Since then, this teaching has been reformed several times, the last time in 2024, when the General Achievement Standards for the subject of Serbian as a Non-Mother Language were adopted for the end of the first, second and third cycles of education.
The Ministry of Education and the Institute for the Improvement of Education have adopted new teaching and learning programs for the subject of Serbian as a non-native language in 2025, as part of reform activities aimed at improving the quality of teaching and student achievement in this subject. The new program from 2025 - although published in the form of a statement by the Ministry of Education - has not yet been formally published in the Official Gazette with the number of the act and date, so without that it still does not become an official, legally binding regulation.
The subject Serbian as a non-mother tongue supports the integration of national minorities into society through language competences, in accordance with the right to education in the mother tongue while learning Serbian as a non-mother tongue. The objectives of the new program relate to the training of students in the use of the Serbian language at a basic level in spoken and written communication. They are also aimed at successful integration into the social and cultural life of the community and the exercise of civil rights. In addition, they encourage respect for Serbian culture and the development of interculturality as an important aspect of a democratic society. All of the above indicates that the curriculum is structured in such a way that, in addition to language competences, it also promotes social values.
The importance of Serbian as a non-native language goes beyond the pedagogical aspects of language learning, as knowledge of the official language of the state is a key factor in social integration. Among students who attend this subject, there are significant differences in the level of proficiency in Serbian when they start school and in the pace and extent at which they

can progress during their education. The difference is due to different mother tongues, some of which are close to Serbian, while others are structurally so different that, without basic knowledge of one of them, communication between speakers is not possible.
In accordance with the above, two programs have been created for the subject Serbian as a non-native language. According to the set goal, expected outcomes and given content, the first program (A) is appropriate for students whose mother tongues are significantly different from Serbian, who live in predominantly linguistically homogeneous environments and have little contact with the Serbian language, and who enter school with almost no prior knowledge of the Serbian language. The second program (B) is intended for students who live in linguistically mixed environments, who can master the Serbian language faster and to a greater extent, that is, to reach a higher level of proficiency in the Serbian language, in accordance with their age. However, both program variants are related, mutually compatible and designed so that the B program variant deepens and expands the level of knowledge achieved by the A program.
As part of the introduction of new programs, ZUOV organized professional training for teachers aimed at the successful implementation of the Curriculum and Learning Program for Serbian as a Non-Mother Language for the first and second cycles of compulsory education and general secondary education. These trainings are available free of charge and focused on the methodology of implementing the new program, structure and practical approaches to teaching.
The free online training "Training of Teachers for the Implementation of the Curriculum and Program of Teaching and Learning for Serbian as a Non-Mother Language for the First and Second Cycles of Compulsory Education and General Secondary Education" is a systemic training that includes two modules. The first module covers topics related to the theoretical foundations of the subject of Serbian as a Non-Mother Language. The second module is aimed at developing the didactic and methodological competencies of teachers, i.e. it includes functional aspects of educational work. The training is implemented on the "Learning Passport - Schools" platform of the Institute for the Improvement of Education (see: https://zuov.learningpassport.org/). The training is accredited by a decision of the Minister of Education and is on the List of Training of Public Interest.
The objectives of the training are: to improve the competences of teachers for planning, implementing, monitoring and evaluating the teaching and learning of the subject Serbian as a non-native language and for designing their own diverse content, methods, techniques, forms of work, relevant for students whose native language is not Serbian, and which are aligned with the goal, outcomes, competencies, nature of the subject and other contextual factors in which the educational process takes place. The trainings are important because they help teachers understand the new curriculum and learning outcomes, to apply teaching methods adapted to students whose native language is not Serbian, to develop competences for working with linguistically and culturally diverse groups of students, as well as to acquire a professional certificate upon completion of the training. The key characteristics of the new program are: focus on language competences and learning outcomes; strengthening the functional use of the Serbian language (speaking, understanding, reading, writing); support for teachers through methodological materials; support for assessment based on learning outcomes.
The training is intended for teachers who implement the teaching and learning program of the subject Serbian as a non-native language in primary and secondary education and is free for participants. It is conducted entirely online. It is available continuously, so that participants can go through the content at their own pace. At the end of the training, participants are awarded certificates of mastery of the training for the application of the subject program, which is important for pedagogical work and further professional development of teachers. We emphasize this especially because the subject requires special pedagogical approaches and

methods, given the different prior knowledge of students. At the end of each topic, they have a test, so the entire training provides them with 24 points of professional development.
The link https://zuov.gov.rs/izdanja-zavoda/ contains manuals containing recommended vocabulary for the subject Serbian as a non-native language.

- Please provide updated statistics on the number of persons belonging to national minorities in the public administration, judiciary and police. Please also inform on the voluntary option of declaring national affiliation, for statistical purposes, in the new public employees register.

Ministry of Justice

The number of persons belonging to national minorities in the judiciary in total is 647 (according to the latest data 2024/25).

Ministry of Public Administration and Local Self-Government

Regarding the possibility for employees in state authorities, autonomous province and local self-government authorities, to declare their national affiliation voluntarily, we highlight the following:
The Law on Civil Servants ("Official Gazette of RS", No. 79/05, 81/05 - correction, 83/05 - correction, 64/07, 67/07 - correction, 116/08, 104/09, 99/14, 94/17, 95/18, 157/20, and 142/22) provides the legal basis for maintaining records on the national affiliation of civil servants and general employees (employees in state authorities) in the Central Personnel Records based on the principle of voluntary declaration, as well as records on the language in which they completed primary, secondary, and higher education. According to this law, the Central Personnel Records are managed by the Human Resources Management Service of the Government of the Republic of Serbia, which may process data recorded in this database for the purpose of performing its duties and in accordance with the law regulating personal data protection.
Additionally, the Law on Employees in Autonomous Provinces and Local Self-Government Units ("Official Gazette of RS", No. 21/16, 113/17, 113/17 - other law, 95/18, 114/21, 92/23) establishes the legal basis for keeping records on the national affiliation of employees, in accordance with the principle of voluntary declaration, as well as on the language in which they completed primary, secondary, and higher education, with the written consent of the employee (employees in autonomous province and local self-government authorities). Furthermore, this law allows autonomous province and local self-government authorities to use the Central Personnel Records of state authorities for maintaining their personnel records, and the Human Resources Management Service is authorized to process the mentioned data.
In January 2024, the Government of the Republic of Serbia adopted the Decree on the Central Personnel Records ("Official Gazette of RS", No. 3/24), which further regulates the content and method of maintaining the Central Personnel Records, as well as the provision of data necessary for entry into the Central Personnel Records of state authorities, autonomous province and local self-government authorities, which is managed by the Human Resources Management Service.
Therefore, the legal framework under the jurisdiction of the Ministry of Public Administration and Local Self-Government allows for the inclusion of data on the national affiliation of employees in state authorities, autonomous province and local self-government authorities in the Central Personnel Records for statistical purposes, provided

that employees voluntarily declare this information in accordance with the law regulating personal data protection.

Ministry of Interior

During the employment process with the Ministry of the Interior, candidates are not required to declare their nationality at that moment or at any point during their career. This is in accordance with Article 47 of the Constitution of the Republic of Serbia, which states that expressing one's nationality is voluntary, and no one is obligated to declare it.
Additionally, the Ministry takes into account the national composition of the population, ensuring appropriate representation of members of national minorities, as well as knowledge of the language and script officially used in the local self-government area related to the employment unit. This approach aims to achieve full equality between members of national minorities and citizens from the majority, in accordance with Article 137 of the Police Law.
Regarding the representation of national minorities among employees, the Ministry actively promotes affirmative action for all national communities, in line with Article 21 of the Constitution of the Republic of Serbia, which mandates equality and prohibits discrimination.

- Please inform on possible improvements, since the last JLS subcommittee, in public broadcasting services in minority languages. How do you intend to increase broadcasting in languages of minorities outside Vojvodina? We take note of RTS having special emissions only in Romani and Albanian.

Ministry of Information and Telecommunications

Pursuant to the Law on Public Information and Media, and with the aim of enabling the exercise of the rights of national minorities to receive information in their own language and to preserve their culture and identity, the Ministry announces each year a Call for Proposals for the Co-financing of Projects for the Production of Media Content in the Languages of National Minorities. Within the framework of this call, support is also provided to multilingual and multicultural projects that contribute to the development of dialogue, as well as to better mutual acquaintance and understanding in multiethnic environments. Compared to 2024, when the amount allocated for this call was RSD 49,200,000.00, the allocated budget for 2025 was increased to RSD 60,000,000.00.

Within the aforementioned period, the Ministry of Information and Telecommunications announced, on 1 February 2025, the Call for the Co-financing of Projects for the Production of Media Content in the Languages of National Minorities for 2025. The submitted projects were forwarded to the addresses of 21 national councils of national minorities, as well as to the Executive Board of the Federation of Jewish Communities in Serbia, for the purpose of obtaining their opinions.

The projects were submitted to the national councils of the Albanian, Ashkali, Bosniak, Bulgarian, Bunjevac, Vlach, Gorani, Greek, Hungarian, Macedonian, German, Roma, Romanian, Rusyn, Russian, Slovak, Slovenian, Ukrainian, Croatian, Montenegrin and Czech national minorities, as well as to the Executive Board of the Federation of Jewish Communities in Serbia, in whose languages the production of media content was planned.

The members of the Commissions were provided with the opinions of the national councils of national minorities regarding the submitted projects, which they took into consideration during the evaluation of projects and the allocation of funds.

On 15 April 2025, the Ministry of Information and Telecommunications adopted the Decision on the Allocation of Funds, under which the implementation of 82 projects for the production of media content in the languages of national minorities was supported within the 2025 Call, in the total amount of RSD 60,000,000.00. Of these projects, 2 were in Albanian, 6 in Bosnian, 6 in Bulgarian, 2 in Bunjevac, 5 in Vlach, 1 in Armenian, 10 in Hungarian, 5 in Macedonian, 1 in German, 26 in Romani, 2 in Romanian, 1 in Rusyn, 6 in Russian, 1 in Hebrew, 3 in Croatian, 1 in Montenegrin, 1 in Czech, and 3 bilingual projects.

Radio Television of Serbia (RTS)

Within the television news programme, under the Correspondents' Editorial Office, there is a National Minorities Segment in which programmes are produced in the languages of national minorities. Journalists of the Correspondents' Editorial Office report from all areas where national minorities live, for all RTS programmes and broadcasts.

In order to fulfil the statutory obligations of RTS, as defined by the Law on Public Service Media, an editorial unit titled Programme in the Languages of National Minorities has been established within the First Programme of Radio Belgrade. Broadcasting of RTS programmes intended for national minorities is also carried out through streaming services on the platform rtsplaneta.rs.

Through internet streaming, 12 television channels and 8 radio channels of RTS are broadcast live worldwide. Consequently, all programmes and projects related to national minorities that RTS produces independently or in cooperation with various institutions and production companies in Serbia and abroad, and which are broadcast on these 20 RTS channels, reach viewers and listeners around the globe.

In addition, the availability of content intended for national minorities through video-on-demand services represents a special feature of RTS Planeta (VoD – Video on Demand), which makes the rich video and audio programme archive of RTS accessible to users worldwide.

- Please provide an update on the implementation of the '*action plan for improvements in the representation of Albanians in institutions*.'

<u>Ministry of Human and Minority Rights and social Dialogue</u>

In addition to ignoring the Ministry's invitations for direct dialogue, representatives of the National Council of the Albanian National Minority also boycott other forms of cooperation with republican and local authorities, as well as with other relevant institutions and organisations. Representatives of this national council refused to participate in the 14th session of the Council for National Minorities, held on 25 June 2025, chaired by the Prime Minister.

- Within the framework of regular visits to national councils of national minorities, administrative districts, and local self-government units of the Republic of Serbia, on 12

September 2025, the Ministry informed the National Council of the Albanian National Minority that Minister Berisha planned a visit to the Council on 23 September 2025. The visit was organized in cooperation with the Coordination Body Service of the Government of the Republic of Serbia for the Municipalities of Preševo, Bujanovac, and Medveđa, with the aim of directly familiarizing with the current socio-political and socio-economic situation in the three multiethnic municipalities where Albanians traditionally constitute a significant share of the population. The meeting was held in the premises of the Department of the Faculty of Economics from Subotica, University of Novi Sad, to which the presidents of the three municipalities, the leadership of the National Council of the Albanian National Minority, representatives of citizen associations, and the Coordination Body leadership were invited. The President of the National Council, Enkel Redžepi, notified the Ministry of Human and Minority Rights and Social Dialogue in writing that the National Council would again not respond to the invitation.

- They also did not participate in the observance of the International Day of the Girl Child, organized on 10 October 2025 for girls from minority communities delegated by national councils.

- In addition, on 4 November 2025, the Ministry sent an invitation to the President of the National Council to meet on 12 or 14 November 2025, at a time convenient for him, to discuss issues relevant to the improvement of the status of members of the Albanian national minority and plans for further cooperation with the Ministry. Representatives of the National Council did not attend this meeting, nor did they participate in the observance of Human Rights Day on 10 December 2025.

- Please inform on Serbia's plans to address the recommendations of the Advisory Committee of the Council of Europe Framework Convention for the Protection of National Minorities (last report of February 2025) regarding the procedure of 'passivisation' of certain addresses[3].

Ministry of Interior

The passivation of the residence address is regulated by the Law on Residence and Residence of Citizens ("Official Gazette of RS", No. 87/11).
In accordance with Article 18 of the aforementioned Law, at the request of a court, state administration body, other body or organization, as well as another legal or physical person, who has a justified legal interest, the competent authority shall verify the fact of permanent residence, i.e. temporary residence, at the address where the citizen has registered residence, i.e. residence.
According to the received request, the first-instance authority is obliged to conduct an examination procedure in the procedure of passivation of the residence, during which, during the verification of the fact of permanent residence at the address of the registered residence of the citizen, an interview is also conducted with witnesses (president of the tenants' assembly, persons from the immediate environment, etc.) and from the persons interviewed during the verification, statements are taken on the record about the

[3] See recommendation in paragraph 13: "The Advisory Committee urges the authorities to engage in dialogue with Albanian minority representatives and other relevant stakeholders to address their concerns regarding the administrative practice of "passivisation" of addresses, particularly the methods used by law enforcement authorities in verifying the resident status in the municipalities of Bujanovac, Medveđa and Preševo and access to effective remedies."

circumstances of the citizen's residence at the address in question, in accordance with the Law on General Administrative Procedure.
In the course of the passivization procedure, the citizen is allowed to participate in the procedure by sending a summons, which is delivered personally, in accordance with the provisions of Article 75 of the Law on General Administrative Procedure, in order for the citizen to declare his permanent residence or temporary residence at the address where he has registered residence.
If, in the conducted procedure, it is established beyond dispute that the citizen does not live at the address, a decision is made to passivize his address and he is ordered to register his residence at the address where he actually lives within 8 days from the date of receipt of the decision.
The aforementioned decision is also delivered to the citizen personally in accordance with the provisions of Article 75 of the Law on General Administrative Procedure, and the citizen can file an appeal to the Ministry of Interior within 8 days from the day of receipt, which is stated in the instruction on legal remedy, which is a mandatory part of the decision, which ensures two-level decision-making.
If he is not satisfied with the decision of the second-instance body, the citizen can request judicial protection by filing a lawsuit with the Administrative Court, which is stated in the instruction on the legal remedy of the second-instance decision, which is also delivered personally to the citizen, i.e. his attorney, if he has one, which ensures judicial protection.
The Law on Residence and Residence of Citizens applies to the entire territory of the Republic of Serbia and to all citizens, regardless of their national, religious or other affiliation, and in all cases when it is determined that the citizen does not live at the address where he registered his residence, the address is deactivated.
The institute of passivation of residence address is regulated by the mentioned Law in order to protect the legal interests, first of all, of the owners of real estate, where other citizens have a registered residence and their Constitutionally guaranteed right to inviolability and disposal of private property, and to prevent citizens from having a registered residence at addresses where they do not live and thus exercise rights that do not belong to them, as well as to ensure the availability of citizens to state and other bodies, organizations and legal entities and thereby prevent them from avoiding their obligations under the law. In addition, in this way it is possible to keep up-to-date records of residence and residence of citizens on the territory of the Republic of Serbia.
Citizens whose address of residence has been deactivated are not deleted from the records of citizens of the Republic of Serbia, and therefore they are not denied access to basic civil rights, such as the right to health insurance, social insurance, education and other rights, with the fact that it is necessary to fulfill the legal obligation to register their residence at the address where they actually live in order to establish the local jurisdiction of the authorities for issuing personal documents.
Certain countries in the region know the institute of deregistration of residence by official duty, which is equivalent to the passivation of the address of residence, as is the case with the Republic of Croatia, which is a member of the European Union, and which provides its citizens with a lower degree of legal protection than is the case in the Republic of Serbia.
Namely, in accordance with Article 12, paragraph 1 of the Law on Residence the Republic of Croatia (Official Gazette 144/12,158/13 and 114/22), the police administration in whose territory the person has a registered residence will issue a decision on the deregistration of the person's residence if a field check determines that the person does not actually live at the registered address or is notified of this by the public authority and other legal or natural persons.

Paragraph 6 of the aforementioned Article of the Law stipulates that no appeal is allowed against the decision on deregistration of residence from Paragraph 1 of this Article of the Law, but that an administrative dispute can be initiated.
Bearing in mind all of the above, and regarding the position of the Advisory Committee of the Framework Convention of the Council of Europe for the Protection of National Minorities that one should refrain from the passivation of the address of residence because it could potentially limit the scope of application of the Framework Convention, we point out that the passivation of the address of residence of citizens is regulated by Article 18 of the Law on Residence and Residence of Citizens, and therefore this Ministry, as well as its organizational units, are obliged to act according to the aforementioned legal provision.

Ministry of Human and Minority Rights and social Dialogue

Within the first section, "Personal Legal Status", of the Draft Action Plan for the Exercise of the Rights of National Minorities, Measure 1.2 identification and removal of issues related to mechanisms for verifying the residence status of members of national minorities is envisaged. Under this measure, six activities are foreseen, the implementation of which will commence following the adoption of the Action Plan.

- Please provide a summary in English, covering at least how indicators were achieved, of the 2024 annual implementation report on the strategy on social inclusion of Roma.

Ministry of Human and Minority Rights and social Dialogue

Report for 2024 on the implementation of activities from the Action Plan for the period 2022–2024 for the implementation of the Strategy for the Social Inclusion of Roma and Romani Women in the Republic of Serbia for the period 2022–2030 https://minljmpdd.gov.rs/dokumenta/izvestaji/

- The Government, at its session held on 3 February 2022, adopted the Strategy for the Social Inclusion of Roma and Romani Women in the Republic of Serbia for the period 2022–2030 ("Official Gazette of the RS", No. 23/22, hereinafter: the Strategy), and on 8 September 2022 adopted the Action Plan for the period 2022–2024 for the implementation of the Strategy for the Social Inclusion of Roma and Romani Women in the Republic of Serbia for the period 2022–2030 ("Official Gazette of the RS", No. 105/22, hereinafter: the Action Plan).

- The competent proposer of the Strategy and the accompanying Action Plan was the Ministry of Human and Minority Rights and Social Dialogue (hereinafter: the Ministry), which also has primary responsibility for the majority of measures and activities envisaged by the Action Plan. The Strategy stipulates that, for the purpose of monitoring the implementation of measures and activities and the achievement of the Strategy's objectives, the Ministry collects data from state authorities responsible for the implementation of specific measures and activities and, in accordance with the law, uses such data to prepare reports on the implementation of the Action Plan.

- For the implementation of this Action Plan, financial resources were planned under the Law on the Budget of the Republic of Serbia ("Official Gazette of the RS", No. 110/21).

The funds were secured within the budget lines of the competent ministries or other state authorities that are responsible for individual activities under this Action Plan.

- The total funds secured under the aforementioned programmes also included funds for the implementation of individual activities from this Action Plan, presented by specific activities, which are grouped within particular types of measures and fall within the permitted multiannual budget limits determined by the Ministry of Finance for all budget users. For certain activities, financing from donor funds was envisaged.

- In this regard, and in accordance with the provisions of Article 58, paragraph 1, item 4), indent 3, of the Regulation on the Methodology of Public Policy Management, Impact Analysis of Public Policies and Regulations, and the Content of Individual Public Policy Documents ("Official Gazette of the RS", No. 8/19), the implementation of such measures was conditional upon the availability of donor funding sources. In all activities where it was stated that they were implemented within programmes financed through budgetary funds, these activities constituted the regular work of civil servants and public employees within the scope of their prescribed duties, whether through participation in working groups or through individual work on monitoring the implementation of regulations, preparing analyses and reports, collecting data, and similar tasks.

- The Government adopted the Decision on the Establishment of the Coordination Body for the Improvement of the Position of Roma and Romani Women, No. 90-3605/20231 ("Official Gazette of the RS", No. 48/23 of 9 June 2023, hereinafter: the Decision). The Coordination Body consisted of representatives of 27 institutions at the national level (including 25 ministries), while the Expert Group of the Coordination Body, in addition to experts from ministries, also included representatives of civil society organisations selected through the Civil Society Platform for the Inclusion of Roma and Romani Women.In accordance with the Strategy and the Action Plan, the Ministry sent reporting templates in January 2025 to all holders of measures and activities whose implementation for 2024 was envisaged by the Action Plan. The report was fully compiled in April 2025, in accordance with the statutory deadline. We note that all submitted data were entered by the Ministry into the Unified Information System for Planning, Monitoring Implementation, Coordination of Public Policies and Reporting (UIS). During this process, intensive cooperation was achieved with the Republic Secretariat for Public Policies, as numerous technical and methodological challenges arose in the functioning of the system, which complicated the entire procedure.

- We note that the institutions that participated in the drafting of the Action Plan are also the proposers of the activities and measures. Based on the submitted reports on the implementation of activities for 2024, we consider that the implementation of this Action Plan was carried out diligently, in line with the timelines proposed by the institutions themselves. There were minor deviations in certain activities, which were justifiably postponed. The Ministry of Construction, Transport and Infrastructure did not submit its contribution in full.

- Please inform on the process and timeline for drafting, consulting on, and adopting a new action plan on Roma inclusion.

Ministry of Human and Minority Rights and social Dialogue

On the proposal of the Ministry of Human and Minority Rights and Social Dialogue, the Government adopted the Decision on the Establishment of the Coordination Body for the Improvement of the Position of Roma Men and Women on 11 September 2025. The inaugural session of the Coordination Body was held on 27 October, during which the mandates of the members of its Expert Group were confirmed. For the purpose of drafting the Action Plan for the Implementation of the Strategy for Social Inclusion of Roma Men and Women, the Expert Group held seven meetings during October and November 2025.

The Action Plan for 2026 and 2027 for the implementation of the Strategy for Social Inclusion of Roma Men and Women in the Republic of Serbia for the period 2022-2030 was adopted at the Government session held on 26 December 2025. Document is available on the Ministry's website: https://minljmpdd.gov.rs/dokumenta/strateska-dokumenta/.

The Action Plan foresees achieving the overall goal through seven specific objectives, whose implementation will be carried out through a range of measures that include individual activities for 2026 and 2027._The financial resources required to implement the specific objectives, measures, and activities were assessed by the proponents of this Action Plan and by the parties responsible for the individual activities outlined in the Action Plan. In this context, all budget beneficiaries - relevant bodies and organizations - carried out a preliminary assessment of the costs of engaging human and other resources needed to implement the planned activities. These estimates were submitted using the PFE Form - Standard Methodology for Assessing Financial Impact of a Regulation, in accordance with the Rulebook on the Method of Reporting and Presenting the Estimated Financial Effects of Laws, Other Regulations, or Acts on the Budget, as well as the Financial Plans of Organizations for Mandatory Social Insurance (Official Gazette of RS, No. 119/23).

For the implementation of the Action Plan for 2026 and 2027 for the Strategy for Social Inclusion of Roma in the Republic of Serbia for the period 2022-2030, funds in the amount of RSD 163,948,000.00 have been secured for 2026, while RSD 164,325,000.00 are planned for 2027, all in accordance with the budgetary capacities of the Republic of Serbia. It is estimated that for the entire duration of this Action Plan, funds totalling RSD 328,273,000.00 will need to be secured from the budget of the Republic of Serbia. In addition, it is necessary to secure funding from donor sources. At the time of drafting this Action Plan, only project-based funding for health-related measures is known, totalling EUR 50,000.00 (donor Global Fund to Fight AIDS, Tuberculosis, and Malaria), while the remaining funding needs for individual activities under the Action Plan from donor sources are estimated at EUR 1,026,750.00. The total value of donor funds included in the Action Plan is EUR 1,243,417.00, which corresponds to RSD 149,210,040,000.00.

All funds required for the implementation of activities charged to the budget of the Republic of Serbia, as presented in the draft Action Plan for 2026, have been secured under the Budget Law of the Republic of Serbia for 2026 (Official Gazette of RS, No. 108/25). For 2027, funds will be planned in accordance with the limits set by the Ministry of Finance for all budget beneficiaries, within the relevant budget sections and corresponding programs under which resources for the activities outlined in this Action Plan are allocated. In this context, no additional funds from the budget of the Republic of Serbia are required to finance this Action Plan. Certain activities are planned to be financed from donor funds.

- Please provide updated information, with statistics where applicable, on where Serbia stands in implementing each of the Poznan Declaration commitments on Roma inclusion. As we understand that data collection was a challenge in the past, please inform what measures you are undertaking to be able to systematically collect data in the future and what is the role of Serbia's Statistical Office in this regard.

Ministry of Human and Minority Rights and social Dialogue

The objectives of the Poznań Declaration are included in the revised indicators within the Action Plan for 2026 and 2027 for the implementation of the Strategy for the Social Inclusion of Roma. Additionally, the Ministry for Human and Minority Rights and Social Dialogue continues to prepare annual reports on the implementation of the Poznań Declaration. Cooperation has been initiated with the Republic Statistical Office regarding the improvement of the data collection process, taking into account the objectives of the Poznań Declaration.

- How do you ensure that mainstream sectoral policies in areas such as education, employment, health, housing and essential services help address Roma equality and inclusion? What are the safeguards which guarantee that these mainstream policies effectively reach marginalised Roma communities?

The Ministry of Education

The Strategy for the Development of Education and Upbringing in the Republic of Serbia until 2030 recognizes various vulnerable social groups in education, one of which is members of the Roma nationality, especially those living in Roma settlements.
The vision for the development of education and upbringing refers to ensuring quality education, in order to achieve the full potential of every child and every young person and adult in the Republic of Serbia.
To achieve the vision of the development of education and upbringing in our country, a culture of lifelong learning is being developed, the transformation of learning and teaching is being carried out in the direction of developing critical thinking, media and information literacy, education aligned with the achievements of science, technology, sustainable development and participation at all levels of the educational process.
The education of Roma is treated separately, given that they have marked differences compared to the majority population (educational coverage, completion rates, etc.). With the aim of increasing the educational coverage of members of the Roma national minority by increasing the enrollment and completion rates of primary education and increasing the enrollment and completion rates of secondary education, in addition to the above benefits, the Ministry of Education is undertaking the following support measures:

- Affirmative enrollment in preschools and primary schools, which is provided to Roma children who do not have the necessary documents;
- Affirmative action measures for the enrollment of Roma students in secondary schools. 2,502 students used affirmative action enrollment measures in the 2024/25 school year;

• According to data from the National Council of the Roma National Minority, the number of students who used positive discrimination when enrolling in college in the 2024/25 academic year is 150.

All national minorities in the Republic of Serbia have the following benefits:

• The examination of a child upon enrollment in school is carried out in the child's native language or by hiring an interpreter at the proposal of the national council of the national minority. If a child older than seven and a half years of age is not enrolled in the first grade due to illness or other reasons, he or she may be enrolled in the first or appropriate grade, based on a prior knowledge check, which is carried out by a team consisting of a class teacher, pedagogue and school psychologist, respecting the standards of achievement and valuing the best interest of the child.
• The law also provides for educational support, so that for students who need this support due to social deprivation, learning difficulties, risk of early school leaving and other reasons, it ensures the removal of physical and communication barriers, adjustment of the method of implementing the school program and the development, adoption and implementation of an individual educational plan. To achieve additional support, the school principal, teacher, professional associate, educator, pedagogical assistant and parent, or other legal representative, can receive special professional assistance in terms of implementing inclusive education.
• The law allows a student who has submitted a request for recognition of a foreign school certificate to be conditionally enrolled in the next grade, if the procedure is not completed by the beginning of the school year, in which case the school is obliged to immediately enroll the student in the appropriate grade.
• Schools implement an early identification and response system to prevent dropouts from the education system, according to a protocol designed at the local level for the prevention of dropouts from education, which connects the school with the social work center, interdepartmental commissions, health centers, misdemeanor judges, local governments and other relevant mechanisms and partners at the local level (Roma coordinators, pedagogical assistants, health mediators). Also, in the last three years, trainings for the recognition and prevention of dropouts from the education system have included more than 11,000 education employees.
• The free textbook program as a support measure that also contributes to reducing dropout rates, especially in the transition period.

The Ministry announces competitions for each school year:

• For the award of student loans
• For the award of student scholarships
• For the award of scholarships to exceptionally gifted students

For the first time in 2024, all tests that are part of this competition procedure were translated into the languages of national minorities.

Ministry of Labour, Employment, Veterans and Social Affairs

The Government of the Republic of Serbia adopted the Action Plan for the period from 2024 to 2026 for the implementation of the Employment Strategy of the Republic of Serbia 2021-2026 (*Official Gazette of the Republic of Serbia*, No. 22/24, hereinafter: the Action Plan), which sets out specific activities that need to be implemented within the framework of reference measures, i.e. specific objectives, descriptions of active labour market policy measures that will be implemented in the reference period, categories of hard-to-employ persons (who have priority when included in the measures), the implementers of the activities and the financial framework. Special attention is paid to improving the labour market position of unemployed women, young people, people with disabilities, beneficiaries of cash social assistance and members of the Roma national minority (Measure 2.7. Improving the labour market position of unemployed Roma men and women), given the difficulties they face in the process of integration or reintegration into the labour market and the multiple factors that make their employability more difficult.

In accordance with the Action Plan, on 26 February 2025, the National Employment Service announced 12 public calls for the implementation of active labour market policy measures in 2025 (including a special Public Call for unemployed Roma people for the allocation of self-employment subsidies in 2025). Within certain measures (especially from the system of additional education and training, and taking into account the unfavourable educational structure of unemployed Roma men and women), unemployed Roma men and women have priority in inclusion (or are also under more favourable conditions compared to other unemployed persons), as a form of affirmative action.

In the period January-September 2025, 1,112 Roma (488 women) were covered by financial measures of active labour market policy (additional education and training, support for employment and self-employment, and support measures for people with disabilities). An additional number of unemployed Roma were included in the financial measures of the active labour market policy through the implementation of local planning documents in the field of employment (technical cooperation with local self-government units), the implementation of the Direct Grant to the National Employment Service from the IPA 2020 programming cycle and through the piloting process of the Youth Guarantee.

In the period January-September 2025, 5,059 unemployed Roma (2,530 women) were included in non-financial measures of active labour market policy (employment fairs, job search club, active job search training for qualified persons, motivational-activation training for persons without qualifications and low-qualified persons, self-efficacy training, a workshop for overcoming stress due to job loss and educational services in the Business Centre).

In accordance with the provisions of the Law on Employment and Unemployment Insurance, the National Employment Service and the unemployed person establish an individual employment plan (IEP), no later than 90 days from the date of entry into the unemployment register, and the IEP is adjusted to the characteristics of the unemployed and the needs of the labour market, at least once every six months. The IEP is the basic instrument in working with an unemployed person and the basis for inclusion in active labour market policy measures. The IEP determines the occupations for which the person will be job-matched, the activities that the person will undertake and the active labour market policy measures in which they will be included with the aim of improving employability, or employment. During a professional advisory conversation with an employment counsellor, the unemployed person is informed about the situation and demand in the labour market, as well as about the available active labour market policy measures. Unemployed persons also have the opportunity to use information services on career development opportunities, career development counselling and information and advisory services at the Business Centre, for those interested in self-employment.

In the period January-September 2025, 161 unemployed Roma (95 women) used information and counselling services on career development opportunities, while 600 Roma (274 women) used information and counselling services at the Business Centre.
Please note that information on the strategic framework of employment policy aimed at improving the position of Roma men and women in the labour market, the characteristics of registered unemployment of Roma men and women and their coverage by active labour market policy measures are available as part of the Annual Reports on the Implementation of the Action Plan for the Implementation of the Employment Strategy of the Republic of Serbia https://www.minrzs.gov.rs/sr/dokumenti/ostalo/sektor-za-rad-i-zaposljavanje/strategija-zaposljavanja (the latest available report refers to 2024). Information is submitted on a quarterly basis for the purposes of preparing contributions to Chapter 23. Furthermore, at the request of the Ministry of Human and Minority Rights and Societal Dialogue, reviews and analyses are submitted for the purposes of preparing a report on the implementation of the Strategy for the Social Inclusion of Roma and the accompanying action plan, analytical material for the purposes of preparing new public policy documents, and for the purposes of preparing reports at the request of the EC or the UN.
Within the framework of the implementation of the project "Support to Sustainable Community-Based Social Protection Services and Inclusion Policies at the Local Level" (implemented by the Standing Conference of Towns and Municipalities - SCTM in cooperation with the MoLEVSA) within the national IPA 2020 Programme, conditions will be created for improving the quality and scope of social protection services and encouraging the inclusion of the most vulnerable groups at the local level by achieving the following specific objectives: improving legal, financial and institutional mechanisms for sustainable planning and functioning of social protection at the local level, improving the implementation of local mechanisms for Roma inclusion and improving the quality of social protection services and Roma inclusion measures at the local level.
The project is working on developing standards, methodologies and models that will serve as a basis for a more intensive and balanced development of social protection services in local self-government units. SCTM provides support to 20 local self-governments for the establishment or improvement of the local social protection system. Selected local self-governments have the opportunity to receive financial support for financing one (or more) social protection services, with a focus on services that contribute to deinstitutionalization and that are particularly important for the quality and further sustainability of the social protection system.
In addition, this project provides support for the social inclusion of Roma, building on the results achieved from previous actions, through the implementation of priority measures envisaged in the Strategy for the Social Inclusion of Roma in the Republic of Serbia (2022-2030). The project will support the formation of new coordination bodies and mobile teams in 10 selected local self-government units and co-financing of annual operational work plans of mobile teams, the development of 20 new local action plans for the social inclusion of Roma men and women, the development and piloting of inter-municipal cooperation models, the establishment of a mobile team for Roma inclusion - an innovative and integrated social protection service at the local self-government level.
In the area of Roma inclusion, comprehensive support is currently being provided to 10 selected local self-governments in building the capacity of mobile Roma inclusion teams and local coordination bodies and supporting their functioning. During the reporting period, operational plans for 2025 were developed and local action plans for Roma inclusion were adopted in all 10 supported local self-governments: Vrnjačka Banja, Žabalj, Vrbas, City

Municipality Obrenovac, Kikinda, Sečanj, Kanjiža, City Municipality Novi Beograd, Čačak, and Požega.
In addition to the above 10 local self-governments where comprehensive support is provided in the area of Roma inclusion, cooperation agreements were concluded in the reporting period with additional local self-governments selected through a public call, which will be supported by the SCTM in the development of local action plans for the inclusion of Roma (10 local self-governments), as well as the development, financing and implementation of operational plans of mobile teams for the inclusion of Roma for 2025 (also 10 local self-governments). Support in the development of local action plans for the inclusion of Roma is being implemented in the City of Vršac, the City of Novi Pazar, the Municipality of Nova Crnja, the City Municipality of Mladenovac, the Municipality of Surdulica, the City of Leskovac, the City of Vranje, the Municipality of Beočin, the Municipality of Prokuplje, and the City of Loznica.
Operational plans of mobile teams for Roma inclusion for 2025 have been developed in the City of Kragujevac, the City of Požarevac, the City of Vršac, the Municipality of Bojnik, the City Municipality of Zvezdara, the City of Pirot, the Municipality of Ruma, the City of Bor, the Municipality of Aleksinac, and the Municipality of Smederevska Palanka, and the preparation of contracts for the transfer of funds in the amount of up to 5,000 euros to provide support for their implementation is underway.
47 grant projects are being implemented in 41 local self-governments, 35 in the field of improving social protection services and 12 in the field of Roma inclusion (the Municipality of Ćuprija abandoned the implementation of the awarded projects at the end of August). Regular monitoring and support for project implementation is provided by the SCTM team in relation to the preparation and administration of project documentation, procurement procedures, monitoring of financial flows, reporting, etc. In most local self-governments, implementation is taking place at a slightly slower pace than planned, which is caused by initial delays, as well as in those local self-governments that envisaged the introduction of cross-sectoral services. In order to support the implementation of these projects, assistance was provided in drafting decisions on piloting services, cooperation protocols and contracts with service providers. The implementation of the project implemented by the City of Novi Pazar was completed on 31 July 2025, and the projects implemented by the municipalities of Bač and Bačka Palanka were completed on 30 September 2025.

Ministry of Health

The Ministry of Health has been implementing the program „Improving the availability of health care for the Roma population since 2008“, which includes the implementation of the Action Plan for the Improvement of Roma Health from 2022-2030. It is implemented through:
- Support for projects implemented in cooperation with Roma citizens' associations to improve the health of Roma men and women
- Implementation of the Action Plan by engaging health mediators.

The role of health mediators is to keep records of the health status of residents of informal settlements, to work with them to raise awareness of the need for vaccination of children, as well as the importance of proper nutrition and hygiene habits.
Health mediators should provide healthcare institutions with a better insight into the condition of these settlements, and to point out to residents the importance of reporting to a doctor in a timely manner. A health mediator is not a healthcare professional (doctor, nurse), she connects the healthcare system and citizens of Roma settlements.

Objectives: improving the health of Roma, especially women and children, improving the accessibility of healthcare, the level of health information, reducing inequality.
The health mediator is engaged by a contract for work with the Ministry of Health, and the compensation for her engagement is money allocated by the Budget of the Republic of Serbia.

Ministry of Human and Minority Rights and social Dialogue

The guarantee for the inclusion of Roma in general policies is represented by the Government Coordination Body for the Improvement of the Position of Roma, chaired by the Prime Minister, within which an Expert Group has been established with representatives at the level of civil servants from all relevant ministries. Furthermore, the competent authorities are obligated as holders of activities and measures within the Action Plan for 2026 and 2027 for the implementation of the Strategy for the Social Inclusion of Roma.
Within the framework of the joint Council of Europe and European Union project - Roma Integration III, the Ministry of Human and Minority Rights and Social Dialogue organized a training session on 21 October 2025 on the use of the regional database for monitoring the implementation of measures under the Strategy for Social Inclusion of Roma Men and Women in the Republic of Serbia. The training was attended by 80 representatives of local self-government units.
On 19 September 2025, the Ministry of Human and Minority Rights and Social Dialogue launched a public call for associations working to improve the position of Roma in the Republic of Serbia on the topic: Promotion of the Romani Language with Elements of National Culture. Based on the Decision on the Selection of Programs of Associations Funded from the Budget of the Republic of Serbia (of 24 November 2025), funding was awarded through this Public Call to five (5) associations, totalling RSD 2,650,000.00. When selecting program proposals for the allocation of financial support, priority was given to programs that, by reaching a larger number of beneficiaries, contribute to achieving the specific objectives of the Strategy for Social Inclusion of Roma Men and Women in the Republic of Serbia for the period 2022-2030.

- When will Serbia adopt the '*national programme for transforming undeclared work among Roma*' to support the Poznan Declaration objective on employment?

Ministry of Human and Minority Rights and social Dialogue

Within the Action Plan for 2026 and 2027, under measure "4.5. Legalization of Roma Work in the Informal Sector, Especially Collectors," the initiation of a consultative process with stakeholders on the formalization and legalization of Roma work in the informal sector, particularly collectors, is foreseen, as well as the implementation of an analysis of the necessary and missing acts for the formalization and legalization of Roma work in the informal sector, especially collectors.

- Please provide updated information on the legalisation of Roma settlements. How is the database on settlements being used?

Ministry of Human and Minority Rights and social Dialogue

The Ministry for human and minority rights, in cooperation with the Council of Europe, has initiated the process of legalizing 50 properties owned by Roma in five local self-government units. The Action Plan for 2026 and 2027 foresees the updating and management of a GIS database related to substandard Roma settlements.

- Please inform on the start of implementation of the new strategy and action plan on Internally Displaced Persons.

Commissariat for Refugees and Migration

The Government of the Republic of Serbia adopted the Strategy for Addressing the Issues of Refugees and Internally Displaced Persons for the period from 2024 to 2030 in November 2024, while in February 2025 it adopted the Action Plan for the period 2025–2027 for the implementation of the Strategy for Addressing the Issues of Refugees and Internally Displaced Persons for the period 2024–2030. The total funds allocated for the implementation of this Action Plan amount to 4,745,435,000 dinars.
The Commissariat for Refugees and Migration issues a Regulation for the Improvement of Living Conditions of Internally Displaced Persons every year, which includes incentives, measures, and activities in local self-government units to improve the living conditions of internally displaced persons while they are in displacement. The funds provided under this Regulation are intended for the purchase of village houses with yards, the provision of construction materials, and economic empowerment.
By adopting these regulations, the Commissariat for Refugees and Migration, in cooperation with local self-government units and through public calls, continues to provide ongoing support to internally displaced persons with the aim of improving their situation and finding permanent solutions to their living conditions. During 2025, a total of 152 families of internally displaced persons were supported, of which 58 families were assisted through the purchase of village houses, and 94 families received packages of construction materials for completing ongoing construction or adapting substandard structures in their ownership.

3.3. Non - discrimination and gender equality *(including work of the Commissioner for Equality, rights of children, persons with disabilities and LGBTIQ persons)*

- As discussed during the VTC meeting on Chapter 23 interim benchmarks on 17/10/2025, please provide a summary in English, covering at least how indicators were achieved, of the 2024 annual implementation reports on the strategies related to, respectively, gender equality, discrimination (including measures related to anti-racism as well as LGBTIQ persons), prevention of violence against children, and persons with disabilities. Please also provide summaries in English on implementation of the strategies related to gender-based violence and to de-institutionalisation (which did not have action plans).

Ministry of Human and Minority Rights and social Dialogue

The Ministry of Human and Minority Rights and Social Dialogue, in cooperation with the OSCE Mission in Serbia, completed an evaluation of the results of the Strategy for Gender Equality for the period from October 2021 to October 2024, which was publicly

published as part of the Basis for Revision of the aforementioned Strategy during the Public Consultations conducted from 17 to 26 November 2025.

Within the aforementioned evaluation of the Strategy, the section referring to "Indicators and target values for results in the Gender Equality Strategy" points to the imprecise formulation of certain indicators, their baseline and target values, or sources of verification, and in particular to the absence of measurable indicators related to the expenditure of planned funds, insufficient human, material, and financial resources for the implementation of the measures contained in the Strategy, as well as insufficient resources for coordination, monitoring, and reporting on the implementation of the Strategy. All of the above necessitates an urgent amendment (revision) of this strategic document in order to ensure greater efficiency. In this regard, the Ministry of Human and Minority Rights and Social Dialogue has initiated the process of revising the aforementioned strategic document and drafting an action plan for 2026 and 2027.

Considering that the 2024 action plan for the implementation of the Strategy for the Prevention and Protection against Discrimination has not been adopted, it is not possible to provide a consolidated annual report. However, the competent ministry has prepared a report on the implementation of the first three years of the Strategy, which also covers 2024, and whose conclusion states the following:

"Since the new Action Plan for the period 2024–2025 was neither adopted nor implemented, although the public consultation on its draft was held in the first quarter of 2024, the situation should be considered in light of this development. During the preparation of the report on the implementation of the first Action Plan, as well as during the work on drafting the new Action Plan, it became clear that the new Action Plan would need to contain realistic deadlines, clearly defined responsible institutions, and improved indicators. However, this was not possible primarily due to the fact that the existing indicators from the Strategy, which must necessarily be taken over in the Action Plan, were not adequate, nor was it possible to revise them in any meaningful way so as to increase their specificity, relevance, and measurability. Therefore, the definition of precise, relevant, and measurable indicators should be the primary objective of any potential revision of the Strategy, accompanied by ensuring the availability of data from regular statistical sources and databases on the basis of which the effects of public policies in the field of human rights could be monitored."

After the preparation of the Report, which is publicly available on the Ministry's website, the procedure for revising the Strategy was initiated, as well as the drafting of the Action Plan for the implementation of the Strategy for 2026 and 2027.

Ministry of Labour, Employment, Veterans and Social Affairs

The Action Plan for the period 2025-2026 for the implementation of the Strategy for Deinstitutionalization and Development of Community-Based Social Protection Services 2022-2026 was adopted at the session of the Government of the Republic of Serbia held on 27 November 2025 (05 Number: 56-12618/2025-1). A three-year report on the implementation of the Strategy for Deinstitutionalization and Development of Community-Based Social Protection Services 2022-2026 was also published and is available on the website of this Ministry at the following link: https://www.minrzs.gov.rs/sites/default/files/202506/Trogodisnji%20izvestaj%20o%20sprovodjenju%20Strategije%20DI%202022-2024.docx.

Summaries on the implementation of strategies for the protection of persons with disabilities, strategies related to gender-based violence and deinstitutionalization are attached.

Report on the implementation of the Strategy for the Prevention and Combating of Gender-Based Violence against Women and Domestic Violence 2021–2025 and Action Plan for 2025

The Strategy for the Prevention of Gender-Based Violence and Violence against Women 2021–2025 is a key national document that sets a framework for prevention, protection and support for victims. It defines long-term goals and specific measures to reduce various forms of violence, including domestic violence, sexual violence and femicide. The main objective of the Strategy is to establish an integrated and efficient system that enables coordination between state institutions, civil society organizations and other stakeholders.
The document foresees activities such as raising public awareness, strengthening institutional capacity, developing standardized services for victims, legislative changes in line with international standards, as well as mechanisms for data collection and monitoring of results. The Strategy also emphasizes the importance of education, training of professionals and responsible media reporting, with a special focus on the protection of the most vulnerable groups of women and children. It serves as a basis for creating operational action plans and monitoring progress in the field of gender equality and protection from violence.
Although the previous action plans were not formally adopted, the activities were implemented continuously, and the new Action Plan for 2025 was prepared for more precise monitoring and more efficient implementation. The Action Plan was the subject of a Public Debate in early 2025 in order to enable the inclusion of various stakeholders and the public in the planning process of this planning document. The Action Plan for 2025 is an operational document that defines goals, measures, activities, implementers, partners, deadlines, indicators and sources of funding. Accordingly, we give a brief summary of the data provided by the implementers of the planned activities:
The Ministry of Justice conducts training for providers of free legal aid so that victims of violence receive efficient legal support. The "You Have the Right!" campaign continued to raise public awareness of the right to free legal aid. Legislation is being aligned with the Istanbul Convention and EU standards, including the definition of rape and the rights of victims. A network of 15 support services for victims and witnesses of crime is being developed, with psychosocial assistance. Courts are being provided with special rooms and video-conferencing systems for hearing vulnerable witnesses. Supervision and counselling for perpetrators of sexual violence is being provided. A new General Protocol on Cross-Sectoral Cooperation in Cases of Violence has been adopted. A Special Protocol for the justice system is being prepared in line with international standards. Civil society organizations are actively participating in the work of the Coordination and Cooperation Group. The Ministry of Justice is also working on a new National Strategy for the Realization of the Rights of Victims and Witnesses.
The Ministry of Interior (MoI) is implementing numerous preventive and informational activities, such as the "16 Days of Activism against Gender-Based Violence" campaign, forums, workshops, brochures and work with citizens. The MoI uses standardized forms for risk assessment and handling of cases of domestic violence.
The National Academy of Public Administration has improved training programs for civil servants and managers, developing a new training course on “Gender Equality and Gender-Based Violence”. During 2025, specialized training courses were conducted for judges,

prosecutors, police officers, social workers and free legal aid providers, with more than 200 participants, including workshops on femicide, discrimination and gender-sensitive language in public services. For training programs for 2026, the introduction of new content is planned, including the use of a web app for entering sex-disaggregated data and the provision of online training that will also cover topics on the prevention of gender-based violence.

The social protection system conducts training courses for professionals to strengthen their capacity in recognizing, preventing and responding to violence. Accredited programs for working with perpetrators exist, but are implemented minimally, indicating room for further improvement. The Provincial Institute for Social Protection actively participates in education, workshops and support to centres for social work.

The Ministry of Information and Telecommunications supports media projects aimed at preventing gender-based violence, including projects on femicide, digital violence and peer violence. The activities have contributed to raising public awareness and improving professional standards in reporting on violence.

The Ministry of Family Care and Demography submitted information on the implementation of activities envisaged in the Action Plan, stating that amendments to the Family Law are planned for 2026, which is why the activities from the Action Plan related to this Law were not implemented in the reporting period.

Based on the report of the Republic Public Prosecutor's Office on the activity *Central Records on Cases of Gender-Based Violence and Domestic Violence established*, the Records, which, according to the provision of Article 32, paragraph 10 of the Law on the Prevention of Domestic Violence, are to be kept by the Supreme Public Prosecutor's Office, have not been established so far, with the note that the Supreme Public Prosecutor's Office keeps two records on the actions of public prosecutors' offices, one of which relates to the suppression of crime and the protection of constitutionality and legality in connection with the procedure prescribed by the Criminal Procedure Code for all criminal offenses, including the criminal offense of Domestic Violence under Article 194 of the Criminal Code, while the other record relates to the implementation of the Law on the Prevention of Domestic Violence.

The Ministry of Human and Minority Rights and Societal Dialogue, the Ministry without Portfolio in Charge of Gender Equality, Political and Economic Empowerment of Women, the Ministry of Health, as well as the Coordination Body for Gender Equality will subsequently submit data that will supplement the Final Report on the Implementation of the Strategy for the Prevention and Combating Gender-Based Violence against Women and Domestic Violence 2021–2025.

Overall, during the period 2021–2025, progress is visible in the area of prevention and protection of victims, strengthening the institutional framework and legislative solutions. However, additional work is needed to systematically develop programs for perpetrators and further improve an integrated, sustainable system of protection from violence.

Final report on the implementation of the Strategy for the Improvement of the Position of Persons with Disabilities in the Republic of Serbia for the period 2020-2024

EXECUTIVE SUMMARY

The Ministry of Labour, Employment, Veterans and Social Affairs has prepared the Final Report on the Implementation of the Strategy for Improving the Position of Persons with Disabilities in the Republic of Serbia for the period 2020 to 2024, which was adopted on March 5, 2020, with a validity period until 31 December 2024.

The final report on the implementation of the Strategy was prepared based on the annual reports for 2021, 2022, 2023 and 2024 on the implementation of action plans for the implementation of the Strategy, published on the Ministry's website, and the report on the implementation of the *ex-post* analysis of the effects of the Strategy, which was prepared in the process of preparing the Strategy for the Improvement of the Position of Persons with Disabilities in the Republic of Serbia for the period 2025 to 2030. The report was published on the E-Consultation Portal on 1 July 2024.

Although primarily in the focus of the Ministry – Disability Department, the Strategy is a multi-sectoral document that relates to persons with disabilities as a large, particularly vulnerable and marginalized group of citizens, and its impact is extremely complex and broad, considering that the needs of persons with disabilities, special accommodation or necessary support are present in almost all aspects of social life. For this reason, its implementation is associated with significant costs related to infrastructure and technological solutions, various types of services and a support system.

Based on the conducted *ex-post* analysis of the impact of the Strategy, i.e. findings from the focus groups and consultative meetings held and the analysis of the implementation of the Strategy's measures and activities, some of the challenges that have affected reporting on the implementation of the Strategy and the implementation of action plans can be identified as follows:

- One of the key conclusions is that the envisaged objectives and measures are general and difficult to measure, because they are not defined in accordance with the SMART methodology for objectives, measures and activities, which results in insufficient specification of the desired change within the objectives and a larger number of measures, so that it is necessary to formulate specific and clear measures and activities with one variable, for easier monitoring of achievement.
- It was particularly highlighted that the issue of formulating objectives and measures in which there are words such as *fully, comprehensively, .in every aspect...* are inadequate since they do not allow for a clear and measurable comparison with the baseline values, and at the same time their use is unrealistic for implementation in a five-year period.

- When analysing the implementation of measures and activities, an uneven and uncertain relationship between measures and activities is obvious, which represents an aggravating circumstance in the evaluation. Certain indicators show that a specific objective has been achieved, although not all measures in that area have been implemented.

- Regarding reporting on implemented measures and activities implemented at the local government level, it has been observed that the same local government units submit reports in one year, while in the second reporting year they do not submit reports, which leads to certain data not being comparable in relation to the planned value, as well as at the level of data from samples for certain years, which is why the achievements and realization of measures and activities cannot be monitored.
- The Strategy and action plans for its implementation have failed to recognize the importance of presenting activities and measures to the wider public, especially end beneficiaries, which would be of great importance for their perception of the issue of the rights of persons with disabilities, but also for the success of the Strategy itself.

The Strategy stipulates that measures and activities are financed from the budget of the Republic of Serbia, the budget of territorial autonomy and the budget of local self-government units, depending on who is responsible for specific activities, as well as from gifts, donations, legacies, loans and other sources.

The overall objective of the Strategy is defined as “equalizing the opportunities of persons with disabilities to enjoy all civil, political, economic, social and cultural rights,

with full respect for their dignity and individual autonomy, ensuring independence, freedom of choice and full and effective participation in all areas of social life, including life in the community".

In terms of the achievement of the overall objective of the Strategy, it can be assessed that it has not been achieved to the expected extent. The participation of persons with disabilities is still significantly lower in all areas of social life, with the exception of education, where the participation of students with disabilities has increased up to the level of secondary education, but open discrimination on the basis of disability has been significantly reduced. However, despite the evident progress in all areas of life and the protection of rights, the level of progress in relation to the needs of persons with disabilities is still too low.

In order to achieve the overall objective of the Strategy, three specific objectives are planned:

- Increased social inclusion of persons with disabilities;
- Ensuring the enjoyment of the right of persons with disabilities to work capacity and family life on an equal basis with others and effective protection against discrimination, violence and abuse;
- Systematic introduction of the disability perspective in the adoption, implementation and monitoring of public policies.

Although there have been significant advances in the field of improving the position of persons with disabilities in the Republic of Serbia, despite the results achieved, as well as the activities and initiatives undertaken in previous years, there are still significant inequalities and a clearly disadvantageous position of persons with disabilities in relation to other citizens. Although significant progress has been made in areas such as improving accessibility (e.g. cognitive and communication), developing social protection services at the local level, equalizing the position of persons with disabilities in relation to regions, etc., the participation of persons with disabilities is still significantly lower in all areas of social life, with the exception of education. Overt discrimination on the basis of disability has been significantly reduced, but despite the obivious progress in all areas of life and the protection of rights, the level of progress in relation to the needs of persons with disabilities is still too low. Also, certain regulations and their implementation in practice require certain substantial changes in order to ensure the full participation and inclusion of persons with disabilities and the enjoyment of all civil rights on an equal level.

In accordance with the analysis of the implementation and achieved effects of the Strategy, it follows that special emphasis should be placed on certain open issues and problems that should be addressed in the following strategic documents in this area:

- Deprivation of legal capacity, i.e. the abolition of the provision of family law protection and consequently the definition and establishment of the institute of decision-making advisors;
- Employment of persons with disabilities under special conditions and the role of work centres and enterprises for professional rehabilitation and employment of persons with disabilities;
- Continuing the development of the concept of inclusive education and the availability of family support at the earliest possible age.

In view of the above recommendations, it is important to note that at the Government session of 16 January 2025, the Strategy for Improving the Position of Persons with Disabilities in the Republic of Serbia for the Period 2025 to 2030 and a three-year action plan for its implementation in the period from 2025 to 2027 were adopted, in which, through the envisaged objectives, measures and activities, they were

included and proposals were made regarding ways to overcome the problems and open issues raised.

Strategy for Deinstitutionalization and Development of Community-Based Social Protection Services 2022–2026- summary

The Strategy for Deinstitutionalization and Development of Community-Based Social Protection 2022–2026 was adopted in 2022. Although the action plans for the previous periods were delayed, institutions have continuously implemented activities aimed at developing community-based services and reducing reliance on institutional placement.
The three-year report[4] on the implementation of the Strategy for Deinstitutionalization Development of Community-Based Social Protection 2022–2026 for the period 2022-2024 has been published and is publicly available on the website of the Ministry of Labour, Employment, Veteran and Social Affairs.
Significant progress has been made in recent years: the number of licensed service providers has increased from 1 (2013) to 338 (2023), services are present in over 90% of municipalities, and the sector employs more than 9,000 workers. Provider pluralism has been developed, with the private and civil sectors taking on a dominant role. Since 2016, the state has supported the development of services through earmarked transfers, in an average annual amount of around 600 million dinars.
Although the community-based services system is strengthening, the coverage of residential care for the elderly remains low (around 1%). The number of places in private homes is growing, while in the EU the coverage is significantly higher (3.8%). The rate of children in care in 2022 was the lowest in the last decade, but an increase in the number of children separated from their families was recorded in the same year. The number of services that prevent institutionalization is growing, but supported housing, day care, respite and shelter services remain underdeveloped.
To strengthen the legal protection of beneficiaries in institutions, the Law on Temporary Care Residents has been in implementation since 2022, which defines residential care as a measure of last resort and introduces a more transparent system with the possibility of monitoring by civil society organizations. This Law introduces for the first time the definition of **deinstitutionalization** into the legal framework of Serbia – "deinstitutionalization is a process aimed at preventing placement in social protection institutions and preparing beneficiaries of temporary accommodation services for their return to the natural environment, which is achieved through the development of community-based services, their sustainable financing, respect for the rights of beneficiaries to their own choice and participation in decision-making processes".
Financial support for the establishment and development of community-based services is provided from various sources of funding – local self-government funds, donations to non-governmental organizations, beneficiary participation, funds from private providers, earmarked transfers from the national budget, international aid funds (IPA, etc.), etc.
The Action Plan 2025–2026 serves to operationalize the objectives of the Strategy and enables efficient resource planning. The plan follows one general and five specific objectives: (1) normative and financial assumptions, (2) balanced development of services, (3) transformation of residential institutions, (4) empowerment of beneficiaries for community life, and (5) strengthening of professional capacities. Measures and activities are foreseen for each objective that follow the structure of the Strategy.

[4] https://www.minrzs.gov.rs/sr/dokumenti/izvestaji/sektor-za-socijalnu-zastitu/trogodisnji-izvestaj-strategija-di-2022-2024

The Proposal Action Plan was subject to public debate from 21 January to 12 February 2025. The working group for the development of the plan consisted of representatives of ministries, provincial and city authorities, institutes, academia, civil society organizations and international partners. The development of the document was implemented with the support of German-Serbian development cooperation projects. Action Plan 2025-2026 for the implementation of the Strategy for Deinstitutionalization and Development of Community-Based Social Protection Services 2022–2026 was adopted at the session of the Government of the Republic of Serbia on 27 November 2025.
The Ministry of Labour, Employment, Veteran and Social Affairs, in partnership with international donors, ensured the implementation of activities envisaged by the Action Plan.
Within the framework of the implementation of the IPA 2020 Programme - "Modernisation of Social Protection Systems", funds have been provided for the implementation of activities defined by the Action Plan within the framework of the service contract "Improving and strengthening efficiency of national social protection regulatory mechanisms, policy implementation tools, quality assurance framework and strengthening capacities to participate in ESF", as well as within the framework of the direct grant contract to the Standing Conference of Towns and Municipalities "Support to sustainable community-based social protection services and inclusion policies at the local level".
Part of the activities were funded by donor funds from the Project "Support to Social Inclusion in Serbia", which is the result of the commitment of the Federal Republic of Germany and the Federal Ministry for Economic Cooperation and Development (*BMZ*) to continue providing support for the social and economic inclusion of vulnerable and marginalized groups in Serbia, and builds on the results of the project "Social Protection Services for Vulnerable Groups".
Key achievements during the three-year period of implementation of the Strategy lie in the increase in the number of licensed social protection service providers, which has been accompanied by an increase in the number of service beneficiaries. The number of municipalities in which licensed services are provided has also increased, and the number of employees providing the services has also increased. Pluralism of service providers has also been achieved, and providers from the real rather than the public sector now dominate.
Challenges, on the other hand, lie in achieving more equal access to services, especially in rural areas, establishing licensed services in municipalities where no service has yet been established, ensuring uniformity of services by age categories of beneficiaries and by types of services, standardizing new services, increasing the representation of women among service providers and beneficiaries, increasing the allocation of funds for the development of community-based services, as well as integrating services from different sectors in accordance with the individual needs of each beneficiary.

Ministry of Family Welfare and Demografy

Concerning this question, the Ministry of Family Welfare and Demography is in charge of prevention and protection of children from violence only. In this regard, the previous Strategy for Prevention and the Protection of Children from Violence (“Official Gazette of the RS”, No. 80/20) expired in 2023. In accordance with positive legislation of the RS, the Ministry is bound to prepare ex-post analysis of the mentioned Strategy and issue ex-ante analysis in order to set up basis for future planning document, which has been planned for the adoption in 2026. Therefore, preliminary talks with UNICEF were

conducted for the support in drafting two analytical documents and their publicizing in first half of 2026.

- Please inform on the staffing of the Office of the Commissioner for the Protection of Equality. Was a new plan prepared and approved by the Parliament? Does the Office have sufficient funding to proceed with recruitment of additional staff in line with the systematisation plan?

Commissioner for Protection of Equality

In addition to the General Policy Recommendation ECRI no. 2, as well as the Paris Principles, the Commissioner also points to the provisions of EU Directives (Directive 2000/43 / EC, Directive 2004/113 / EC, Directive 2006/54 / EU, Directive 2010/41 / EU), which apply not only to the obligation for all EU member states, accession countries and the countries of the European Economic Area to designate an equality body in order to promote equal treatment, but also the obligation to implement minimum standards regarding the competence and functional independence of equality bodies, efficiency, sufficient powers and adequate resources to operate. In accordance with the above, we point out that the National Assembly gave its consent to the Rulebook on Internal Organization and Systematization of Jobs in the Professional Service of the Commissioner for the Protection of Equality, which determined that the total number of systematized jobs in the Professional Service is 60 civil servants and state employees. However, this level has not yet been reached. Reaching the number of employees in the Professional Service of the Commissioner is one of the tasks that need to be fulfilled in order to raise the capacity of this body in performing all tasks defined by the Law on Prohibition of Discrimination. As of December 31, 2025, the Professional Service of the Commissioner has a total of 43 permanent employees, two of whom are assigned to the Commissioner's Office in Novi Pazar.

- Please inform on the staffing in the Ministry of Human and Minority Rights and Social Dialogue's Department for anti-discrimination policy and promotion of gender equality. Does the Department have sufficient funding to proceed with recruitment of additional staff in line with the systematisation plan?

Ministry of Human and Minority Rights and social Dialogue

In the Ministry of Human and Minority Rights and Social Dialogue, in the Anti-Discrimination Policy Department of the Sector for Anti-Discrimination and Promotion of Gender Equality, in the third and fourth quarters of 2025 there were no changes compared to the previous reporting period, i.e., no new staff were employed.

- Please inform on the process and timeline for amending the Law prohibiting discrimination to align further with the EU *acquis* (including outstanding comments shared by the European Commission on 24/2/2022 on aligning with Racial Equality Council Directive 2000/43/EC and Employment Equality Council Directive 2000/78/EC as well as the provisions on the independence, mandate, powers and resources of the Commissioner for the Protection of Equality with Directives 2024/1499 and 2024/1500 on minimum

standards for equality bodies in the field of equal treatment) and Council of Europe's standards (outstanding comments shared by the European Commission on 8/10/2021).

Ministry of Human and Minority Rights and social Dialogue

The Draft Action Plan for 2026 and 2027 for the implementation of the Strategy for the Prevention and Protection against Discrimination provides for the conduct of a needs analysis for further harmonization of the Law on the Prohibition of Discrimination, as well as other regulations in the field of human rights protection, with international legal standards. Based on the results of the analysis, and taking into account the recommendations of the European Commission, the preparation of the Draft Law on Amendments and Supplements to the Law on the Prohibition of Discrimination is planned during 2027.

- Please inform on the process and timeline for amending the Law on gender equality to align further with the EU *acquis* and Council of Europe's standards.

Ministry of Human and Minority Rights and social Dialogue

In the period from July to December 2025, the Constitutional Court did not issue a final decision based on the submitted initiatives for assessing the constitutionality of the Law on Gender Equality, and therefore there was no change in status on this matter (Constitutional Court Decision 1Uz-85/2021 of 27 June 2024).

- Please inform on the process and timeline for drafting, consulting on, and adopting new action plans on the fight against discrimination and on gender equality.

Ministry of Human and Minority Rights and social Dialogue

In the fourth quarter of 2025, the process of drafting the Decision on Amendments and Supplements to the Strategy for the Prevention and Protection against Discrimination for the period 2022–2030 was initiated, together with the Draft Action Plan for 2026 and 2027. Amendments and supplements to the Strategy were made to address deficiencies in the indicators of results, outcomes, and effects of the measures and objectives of the Strategy, while the action plan represents an improved version of the Draft Action Plan for the period 2024–2025, which was not adopted. The new action plan is expected to be adopted in January 2026.

By the Ministry's Decision of 26 November 2025, a Working Group was established for drafting the Proposal for Amendments and Supplements (Revision) of the Strategy for Gender Equality for the period 2021–2030 and the Draft Action Plan for 2026 and 2027, which included 9 civil society organizations through a public call. The Working Group held its first meeting on 17 December 2025. According to the plan, the drafting of the Proposal for the Strategy Revision and the Draft Action Plan is expected to be completed by the end of the first quarter of 2026.

- Please inform on when a national housing strategy, which would take into account the 2016 report of the UN Special Rapporteur on adequate housing, is planned to be adopted. Last year you informed that it was drafted but not yet adopted.

- Please provide updated data as regards the expected overall result – "*adequate prosecution of hate crime ensured*" – under measure 3.8.1. of chapter 23 action plan. How many convictions on hate crime, broken down by bias motivation, have there been since this was introduced as an aggravating circumstance in the criminal code in 2012 in total, as well as in 2025 (or 2024 if not yet available)?

Supreme Public Prosecution Office

The Instruction of the Republic Public Prosecutor as of December 2015 determined obligation of keeping of **special records** of criminal acts committed out of hatred in the sense of Article 54a of the Criminal Code (Special Circumstance for Determining a Punishment for a Criminal Offence Committed in Hatred), in all appellate, higher and basic public prosecution offices. These records, among other things, contain **data on bias motivation for commission of criminal act**. In line with the Instruction Appellate Public Prosecutions submit to the Supreme Public Prosecution summary quarterly records of regional Public Prosecutions and that way, regular updating of the consolidated records kept by the Supreme Public Prosecution is carried out.

In accordance with the consolidated data on the implementation of the Article 54a of the CC until 31 December 2024 **public prosecutions implemented provision of the Article 54a of the Criminal Code in 48 cases**. Based on the submitted indictment acts, in accordance with the Article 54a of the Criminal Code, **courts rendered final adjudications (all convictions) in 20 cases**, out of which in three cases courts found that the criminal acts were not committed out of hatred and that there were no legal grounds for implementation of the Article 54a of the Criminal Code. Furthermore, in six cases indictments were filed and in two cases investigation is underway.

Regarding bias motivation:

- **24 cases are related to sexual orientation of victim**. Based on the submitted indictment acts, in accordance with the Article 54a of the Criminal Code, courts rendered final adjudications (all convictions) in 10 cases, out of which in 2 cases courts found that the criminal acts were not committed out of hatred and that there were no legal grounds for implementation of the Article 54a of the Criminal Code. Furthermore, in 3 cases indictments were filed and in 1 case investigation is underway.

- 11 cases are related to national origin of victim. Based on the submitted indictment acts, in accordance with the Article 54a of the Criminal Code, courts rendered final adjudications (all convictions) in 5 cases and in 1 case indictment was filed.

- 7 cases are related to ethnical origin of victim. Based on the submitted indictment acts, in accordance with the Article 54a of the Criminal Code, courts rendered final adjudications (conviction) in 2 cases, out of which in 1 case court found that the criminal act was not committed out of hatred and that there were no legal grounds for implementation of the Article 54a of the Criminal Code. In 1 case investigation is underway.

- 4 cases are related to religion of victim. Based on the submitted indictment acts, in accordance with the Article 54a of the Criminal Code, courts rendered final convictions in 2 cases and in 2 cases indictments were filed.

- 2 cases are related to gender identity of victim. Based on the submitted indictment act, in accordance with the Article 54a of the Criminal Code, court rendered final conviction in 1 case.

- Please provide up-to-date information on how Serbia addressed recommendations in the last ECRI report of April 2024. We note that the State reply annexed to the report does not inform on how the recommendations will be addressed but rather disagrees with the majority of the findings. *Considering the link with the IBMs and the need for the Commission to receive structured feedback in view of the future IBAR, please find here below a suggested template to follow up on Council of Europe bodies' recommendations, as also discussed in the Chapter 23 interim benchmarks VTC on 17/10/2025*:

Ministry of Human and Minority Rights and social Dialogue

Within the framework of the sixth monitoring cycle, the European Commission against Racism and Intolerance (ECRI) issued 15 recommendations to Serbia. (Report on Serbia, published on 27 June 2024 https://minljmpdd.gov.rs/sektori/ljudska-prava/konvencije-saveta-evrope-i-drugi-se-mehanizmi/evropska-komisija-protiv-rasizma-i-netolerancije-saveta-evrope-ecri/).

ECRI's recommendations related to the advancement of the Roma community were taken into account during the drafting of the Action Plan for 2026 and 2027 for the implementation of the Strategy for Social Inclusion of Roma Men and Women in the Republic of Serbia. The remaining recommendations will be addressed through activities in the forthcoming Action Plan for 2026 and 2027 for the implementation of the Strategy for Prevention and Protection against Discrimination, which is scheduled to be adopted in the first quarter of 2026.

Taking into account ECRI's recommendations, the Ministry of Human and Minority Rights and Social Dialogue launched a public call on 5 September 2025 for associations working in the field of anti-discrimination policy, on the topic: Identifying and Combating Hate Speech in Local Communities and the Digital Space. The call remained open until 19 September. Based on the Decision on the Selection of Programs of Associations Funded from the Budget of the Republic of Serbia, dated 26 November 2025, funding was awarded through this Public Call to four (4) associations (from Novi Sad, Belgrade, Crvenka, and Niš), totalling RSD 3,000,000.00. The purpose of the Public Call is to raise awareness of the consequences of hate speech in the digital space, improve local-level cooperation in combating hate speech, and support the implementation of measures from the Strategy for Prevention and Protection against Discrimination for the period 2022-2030.

Template example for recommendations foll

- Please provide an update on the draft law on same-sex partnerships and any related measures in this area (including as regards the CJEU judgement on case C-713/23 *Wojewoda Mazowiecki*).

Ministry of Human and Minority Rights and social Dialogue

In December 2025, the Ministry for Human and Minority Rights and Social Dialogue, in cooperation with the Council of Europe, initiated the preparation of an analysis on the framework for the legal recognition of same-sex unions. As a prerequisite for the analysis, a questionnaire was prepared for the competent state administration authorities, and the collection of their responses is currently underway. The draft law on same-sex unions has not been revised since 2021, when it was submitted to the Government for confirmation, at which time the draft was not considered. This draft also includes a section on the legal effect of a recognized same-sex union concluded in a foreign country.

- Please provide an update on the implementation of amendments to the law on birth registry enabling data on gender changes in the registry.

Ministry of Public Administration and Local Self-Government

Under the new Law on the Civil Register ("Official Gazette of the Republic of Serbia", No. 109/2025), the application of which begins upon the expiry of three years from the date of its entry into force, a simplified and more efficient procedure for entering data on gender change into the Civil Register has been introduced, with the aim of ensuring faster and more effective exercise of citizens' rights.

Under the new legal framework, data on a gender change are entered directly on the basis of a certificate issued in electronic form by the competent health care institution. The previous requirement for the adoption of a separate administrative decision by the competent authority has been abolished, thereby significantly reducing the number of procedural steps and the overall duration of the procedure.

The competent health care institution is obliged to submit the certificate on gender change directly to the registrar of the administrative authority competent according to the place of birth registration, within eight days from the date of the gender change. Compared to the previous solution, the deadline for submitting the certificate has been shortened from 15 to 8 days, contributing to a faster updating of official records and, consequently, to the exercise of the rights of persons who have changed gender.

The introduction of electronic data exchange and the direct involvement of the registrar further enhance the efficiency of the procedure, reduce the administrative burden for the persons concerned and strengthen legal certainty. These amendments enable the timely alignment of personal data in civil records and faster access to personal documents and other related rights, in line with European standards on the protection of human rights and respect for private life.

- Please inform on judicial follow-up to the attacks on LGBTIQ persons and on premises of LGBTIQ CSOs (in 2024 and 2025).

Supreme Public Prosecution Office

A criminal complaint regarding the attack on the premises of the Pride Info Center in Belgrade on 7 January 2024 was submitted to the Higher Public Prosecution in Belgrade, which initiated a pre-investigation procedure and filed a request to the police to gather the necessary information. The police submitted a report informing the prosecution that, pursuant to the

aforementioned request, video recordings of the event had been obtained, a photograph of the perpetrator had been extracted and a special notification had been issued and the representative of the injured party was interviewed.

However, the perpetrator has not yet been identified, therefore the prosecution requested the police to continue undertaking activities and measures to identify the perpetrator.

- Please inform on the process and timeline for drafting, consulting on, and adopting the new strategy against violence against women and domestic violence and related action plan.

Ministry of Labour, Employment, Veterans and Social Affairs

The Government of the Republic of Serbia adopted, at its session held on 30 December 2025, the Decision on the extension of the implementation period of the Strategy for Preventing and Combating Gender-Based Violence against Women and Domestic Violence 2021-2025, until 2027.
This amendment includes a revision of indicators, since new data and better solutions have emerged since the adoption of the document, which will adequately present results in certain areas.
The draft action plan for 2026 for the implementation of this strategy will contain all measures and activities necessary to achieve the general and specific objectives, as well as a detailed presentation, clarification and specification of all indicators. The adoption of the action plan is scheduled for the end of the second quarter of 2026.

- Please inform on possible improvements in the enforcement of the law against domestic violence. Please provide statistics on all types of violence against women, disaggregated by type of violence and by relationship between perpetrator and victim. Please include information on the pilot project on which Serbia reported at the last JLS subcommittee, aimed at improving record keeping of cases of violence against women.

Ministry of Justice

Since September 2018, the Ministry of Justice, based on data received on a monthly basis from the Supreme Public Prosecutor's Office on the implementation of the Law on the Prevention of Domestic Violence, has been keeping records that specifically relate to the relationship, whether kinship or partnership, between the perpetrator of violence and the victim. The Ministry of Justice's website "Exclude Violence" publicly provides monthly data on the relationship between the perpetrator and the victim, so we have categorised data on violence committed between persons with whom the perpetrator of violence is in a current or previous marital, extramarital or partnership relationship, as well as data in situations of violence when the perpetrator and the victim are members of a family household, i.e. when the perpetrator of violence and the victim are blood relatives in the direct line, in the collateral line up to the second degree or with whom the perpetrator of violence is an in-law relative up to the second degree, as well as when the perpetrator and the victim are in the relationship of adoptive parents and adopted children, foster parents and foster children, as well as other persons with whom the perpetrator lives or has lived in a common household in accordance with Article 3 of the Law on the Prevention of Domestic Violence. In this sense, the website "Exclude Violence"

contains specially categorised data for the relationship between father and son, son and father, mother and son, son and mother, mother and daughter, daughter and mother, father and daughter, daughter and father, brother and brother, brother and sister, sister and brother, sister and sister, grandmother and grandson, grandson and grandmother, daughter-in-law and father-in-law, father-in-law and daughter-in-law, mother-in-law and daughter-in-law, daughter-in-law and mother-in-law, daughter-in-law and brother-in-law, brother-in-law and daughter-in-law, son-in-law and mother-in-law, mother-in-law and son-in-law, son-in-law and father-in-law, father-in-law and son-in-law, step-mother and step-son, step-son and step-mother, step-father and step-son, step-son and step-father, step-father and step-daughter, step-daughter and step-father, step-mother and step-daughter, step-daughter and step-mother, grandfather and granddaughter, granddaughter and grandfather, grandfather and grandson, grandson and grandfather, as well as other persons with whom the perpetrator lives or has lived in a common household in accordance with Article 3 of the Law on the Prevention of Domestic Violence.

The Ministry of Justice will, in order to more precisely analyse and more effectively respond to various forms of violence, as well as to better plan preventive measures and improve existing mechanisms for the protection of victims, carry on to continuously improve the legislative framework and practice in the field of prevention and suppression of domestic violence, and one of the ways will certainly be to improve the system of collecting and processing data related to types of domestic violence, given that the Law on the Prevention of Domestic Violence recognizes the existence of physical, psychological, sexual and economic violence.

The Ministry of Justice drafted the Law on Amendments and Supplements to the Law on Prevention of Domestic Violence that was sent to the European Commission on November 10th. The public debate lasted until December 2nd, 2025 and the comments received during public debate were sent to the European Commission on December 18th 2025.

Statistical Data on the Implementation of the Law on the Prevention of Domestic Violence for nine months of 2025	
FEMALE VICTIMS	
MEN – WOMEN	
Husband – wife	3589
Ex-husband – ex-wife	1094
Common-law husband – common-law wife	1393
Boyfriend – girlfriend	954
Ex-boyfriend – ex-girlfriend	755
Son – mother	1166
Father – daughter	759
Brother – sister	474
Father-in-law – daughter-in-law	169
Grandfather – granddaughter	138
Grandson – grandmother	96
Stepfather – stepdaughter	114
Son-in-law – mother-in-law	93

Brother-in-law – sister-in-law	67
FEMALE VICTIMS	
WOMEN – WOMEN	
Mother – daughter	220
Daughter – mother	263
Sister – sister	206
Mother-in-law – daughter-in-law	172
Granddaughter – grandmother	75
Grandmother – granddaughter	66
Stepdaughter – stepmother	69
Daughter-in-law – mother-in-law	114
Other family relationships	96
MALE VICTIMS	
MEN – MEN	
Son – father	900
Father – son	881
Brother – brother	643
Father-in-law – son-in-law	74
Son-in-law – father-in-law	91
Stepfather – stepson	63
Grandfather – grandson	71
Grandson – grandfather	44
MALE VICTIMS	
WOMEN – MEN	
Wife – husband	366
Ex-wife – ex-husband	179
Common-law wife – common-law husband	257
Girlfriend – boyfriend	148
Ex-girlfriend – ex-boyfriend	80
Mother – son	251
Daughter – father	135
Sister – brother	141
Mother-in-law – son-in-law	82
Daughter-in-law – father-in-law	153
Stepmother – stepson	49
Grandmother – grandson	128

Other family relationships	98

Due to technical reasons, we are unable to provide statistical data for the remaining three months.

- Please provide statistics on access to safe houses by victims of domestic violence (in 2025, compared with 2024).

Ministry of Labour, Employment, Veterans and Social Affairs

Table - Licensed and active providers of local services of shelter, 2016 – 2024

	2016	2017	2018	2019	2020	2021	2022	2023	2024
Shelters - total	8	8	9	12	15	15	14	14	15
Shelters for victims of violence	4	4	4	5	6	6	5	5	6
Shelters for children	1	1	1	2	3	3	3	3	3
Shelters for adults	3	3	4	5	6	6	5	5	5
Shelters for victims of human trafficking	0	0	0	0	0	0	1	1	1

Source: RISP

Key findings on the provision of the shelter service for victims of violence in 2024

The shelter for victims of violence is intended for all victims of domestic violence, abuse or neglect in order to provide them with accommodation and ensure safety, find sustainable solutions to the crisis situation, meet basic needs and enable access to other services.

- During 2024, there were 349 beneficiaries accommodated in shelters for victims of violence: 153 adult women and 196 minors, and as of 31 December 2024, 51 beneficiaries: 31 women and 20 children. The coverage rate of Serbia's population by the shelter service for victims of violence was 0.5.
- In relation to the age structure of adults, 76.5% were adult women, followed by young people with 18.3%, while the share of older women was 5.2%.
- In relation to the gender structure of adults, there was only one young male beneficiary accommodated in the shelter for victims of violence, and the rest were women. Among the minor users, there was also one minor mother.
- In the structure of children placed with their mothers, children under three years old made up 24.5%, from three to five years old 24%, from six to 14 years old 43.4%, and from 15 to 17 years old 8.2%. In the gender structure of children, there were more girls, with a share of 54.6%.
- During 2024, 70 beneficiaries left the shelter on their own initiative and without a protection plan, while for 81 beneficiaries, the termination of placement was planned. After leaving the shelter, women face problems in starting an independent life, i.e. securing housing. Namely, only 52 women managed to organize an independent life after leaving the shelter, and the rest, according to the protection plan, were placed with relatives (16%) or primary family (12.3%) and in an accommodation institution (1.2%).
- 45.8% of women stay in shelters for up to a month, and 17.6% for longer than six months, although this is contrary to the purpose of the service and standards. Longer

stays are a consequence of difficulties in organizing independent life after leaving. One of the main causes of these problems is that women who use shelter services are most often unemployed: out of a total of 105 young and adult users, 72.4% were unemployed, which further indicated their vulnerability and need for support.

- In 2024, the shelter accommodation service for victims of violence was provided by six licensed providers based in Kragujevac, Zrenjanin, Leskovac, Vranje, Niš, and Belgrade, and was used by beneficiaries from 42 municipalities in the Republic of Serbia.
- In terms of the sector and activity of the founder, five providers belong to the public sector (founded by local self-government units), while the provider from the general sector was a citizens' association. Three providers have a license for six years.
- During 2024, there were 59 employees. Professional workers made up 59.3% of the total number of employees as of 31 December 2024.

Key findings on the provision of the shelter service for victims of human trafficking in 2024.

The shelter for victims of human trafficking is intended for victims of human trafficking to provide them with accommodation and ensure safety, meet basic needs, enable access to other services and increase their ability to integrate into the community.

- During 2024, there were 16 beneficiaries in the shelter for victims of human trafficking: eight girls, five young people and three adult women. As of 31 December 2024, there were a total of five beneficiaries, namely one girl, two young people and two adult women.
- The first shelter for victims of human trafficking was licensed in 2023 and established by the Centre for the Protection of Victims of Human Trafficking. The shelter has a limited license for five years, with a defined capacity for six beneficiaries of victims of human trafficking.
- The number of employees during 2024 was 12, while at the end of the year, as of 31 December 2024, there were nine employees.

Counselling-therapeutic and socio-educational services - SOS help-line

In accordance with the Law on Social Protection, counselling-therapeutic and socio-educational services represent one of the key groups of social protection services, aimed at providing intensive support to individuals and families in crisis, preventing the deepening of problems and strengthening the capacity for independent and productive life in the community. The Law recognizes these services as an extremely broad and significant group of interventions, which includes counselling and support in cases of violence, family therapy, mediation, SOS help-lines, as well as other forms of counselling and educational support.
However, unlike most other social protection services, counselling-therapy and socio-educational services are not regulated in more detail by law, nor are they standardized, which has resulted in marked inequality in their understanding, organization and methods of provision in practice. In this context, the SOS help-line for women with experience of gender-based violence is the only exception, since it is the only counselling-therapy service for which special standards and closer conditions for the provision of the service have been adopted.

The purpose of the help-line service is to empower women with experience of gender-based violence. The service is provided anonymously and with respect for confidentiality standards. The target group is female persons with experience of gender-based violence, regardless of age.

Key findings on the provision of the SOS help-line service in 2024

- In 2024, there were five licensed providers of the SOS help-line service, of which three providers were actively providing the service. Four other providers provided the service without a license. All five licensed providers are from the general sector, founded by citizens' associations. Two providers from the general sector have six-year licenses, and three providers have a limited license.
- In 2024, three active licensed providers provided services to 860 beneficiaries. The largest share was made up of adult women with 81.3% (aged 26-64), while the share of girls was 2.4%.
- In 2024, women and girls reported emotional or psychological violence in 42.7% of cases, physical violence in 25.5%, and economic violence in 15.6%. In 69.5% of cases, the perpetrators of violence were current or former spouses or common-law partners.
- The overall coverage rate of the Republic of Serbia by the help-line service in 2024 was 2.6.
- In 2024, there were a total of 117 employees, and 77.5% of all associates had completed an appropriate accredited training program.

The data was obtained from the Republic Institute for Social Protection, which is the official producer of social protection statistics and the latest published data is for 2024.

- Please inform on concrete plans for addressing recommendations in the last GREVIO report of September 2025. *Considering the link with the IBMs and the need for the Commission to receive structured feedback in view of the future IBAR, please find here below a suggested template to follow up on Council of Europe bodies' recommendations, as also discussed in the Chapter 23 interim benchmarks VTC on 17/10/2025*:

The Cabinet of the Minister without Portfolio responsible for Gender Equality, combating Violence against Women and the Economic and Political Empowerment of Women

With regard to the recommendations of the GREVIO Committee addressed to the Republic of Serbia on the basis of the preliminary report prepared in September 2023, it is envisaged that the competent institutions of the Republic of Serbia will adopt these recommendations by the end of 2027.

Responsibility for their implementation and adoption lies with the relevant line ministries, namely:

- the Ministry of Health,
- the Ministry of Education,

- the Ministry of Labour, Employment, Veteran and Social Affairs,
- the Ministry of Justice,
- the Ministry of the Interior.

These ministries have been identified as the key holders of institutional obligations in the process of implementing the GREVIO Committee's recommendations in accordance with the Istanbul Convention.

- Regarding allegations of irregularities in the allocation and effective spending of public co-funding in the area of protecting women from violence, please provide an update on the information provided by the Ministry of Family Care and Demography at the last JLS subcommittee, namely that the Ministry had established an internal commission for the monitoring of these funds, in collaboration with the State Audit Institution which had made recommendations on how to run the calls. What were the findings and measures recommended by this internal commission?

Ministry of Family Welfare and Demografy

The Ministry of Family Welfare and Demography has already reported on this question indicated that it provided all necessary and regulated assistance for checking of the selection procedure to organizations concerned, which they exercised. In addition, the Ministry offered the establishment of an internal commission for monitoring of the effective spending of these funds in cooperation with the State Audit Institution. However, this mechanism has been not set up due to the reconstruction of the Government in April 2025 and a new leadership of the Ministry have not considered this issue due to the absence of any further allegations.

- Please provide updated information on the implementation of the national programme for safeguarding and improving sexual and reproductive health. Was a new monitoring report published?

Ministry of Health

Recognizing the importance of an organized and successful public health response to the HIV epidemic in Serbia, the Ministry of Health, in cooperation with partners from the public and civil sectors, developed a multisector Strategy for the Prevention and Control of HIV Infection and AIDS for the period 2018-2025 with an accompanying Medium-Term Action Plan for the period 2018-2021, which was adopted by the Government of the Republic of Serbia on 30 July 2018.
The overall goal of the Strategy is the prevention of HIV infection and other sexually transmitted infections, as well as the reduction of mortality and improvement of the quality of life of people living with HIV.
The strategic document emphasizes preventive programs and increasing the scope of HIV testing in health facilities and in the community for the purpose of early diagnosis of infected persons, as well as treatment and peer support for people living with HIV, protection of human rights and elimination of stigma and discrimination against people infected with HIV and populations at higher risk, establishment of quality standards in prevention and peer support programs and provision of strategic information for action.

The strategy is based on a multidisciplinary approach, and recognizes the strategic partnership of the public and civil sectors.
Since October 2019. Citizens' associations, under a contract with the Ministry of Health through the program "Support to the activities of citizens' associations in the field of prevention and control of HIV infection", which is co-financed by a donation from the Global Fund to Fight AIDS, Tuberculosis and Malaria - GFATM, have successfully implemented prevention programs in key populations at increased risk of HIV infection (men who have sex with men, people who inject drugs and people who work as sex workers), including counselling and testing for HIV, hepatitis C and syphilis in the community in cooperation with health institutions, as well as a support program for people living with HIV. As part of the aforementioned program, in 2024, a total of 17,354 people from key populations at risk of HIV (men who have sex with men, people who inject drugs, sex workers) received a minimum package of services (individual counselling or counselling followed by HIV testing and condoms, or injection equipment). At least some of the HIV infection prevention services were received by 17,712 people from key populations at risk of HIV, which is less than in the previous three years when there were more than 18,000.
During 2024, 1,164 people living with HIV received some of the support services from the association's (peer) counsellors, which is more than in the previous three years. The minimum package of services (counselling on ARV therapy or one-on-one counselling) was provided to 1,057 people living with HIV. Support services were provided by both associations engaged in the implementation of the Ministry of Health project "Support to the activities of citizens' associations in the field of prevention and control of HIV infection", as well as those that independently implemented other projects.
During 2024, 17,668 people received the service of voluntary and confidential HIV counselling and testing (which is more than in 2023, when 16,953 people were reached). Of the total number of people counselled and tested for HIV infection during 2024, 84% were from three key populations at risk of HIV, i.e. from the populations of men who have sex with men, people who inject drugs and sex workers. These tests were mostly carried out in the community as part of the implementation of a project of the Ministry of Health, co-financed by the GFATM grant, where associations and territorially competent public health institutes/departments worked on providing this service. More precisely, within the framework of this project, a total of 14,194 people in the community (outside health institutions) were counselled and tested, which is 80% of the total number of people counselled and tested.
Another example of the successful response of the state is that in the period 2005-2024, more than 45 children were born in Serbia to HIV-infected mothers who were not infected with HIV. Transmission of HIV from mother to child is extremely rare in Serbia. In the period 2005-2024, 16 children were registered to whom HIV was transmitted by mothers who did not know that they were infected with HIV, compared to 28 children in the period 1993-2004. All pregnant women who know that they are infected with HIV have the opportunity to fully prevent the transmission of HIV to their baby by timely inclusion in a comprehensive program for the prevention of mother-to-child transmission of HIV.
• The Institute of Public Health of Serbia "Dr Milan Jovanović Batut" implemented the Research on HIV seroprevalence and risk behaviors among populations at increased risk of HIV within the framework of the implementation of the Strategy for the Prevention and Control of HIV Infection and AIDS in the Republic of Serbia, 2018-2025. and the Strategy for the Prevention of Drug Abuse, 2014-2021., funded by the Ministry of Health of the Republic of Serbia from funds earmarked for health programs of general interest. In accordance with UNAIDS recommendations, the research was conducted in Belgrade

among people who inject drugs, people who work as sex workers and men who have sex with men according to the recommended sampling methodology, bearing in mind that the defined minimum is the implementation of the research in Belgrade, which, as the capital, serves to assess the situation in the observed populations at the state level. Given that additional funds were approved from the donation of the Global Fund to Fight AIDS, Tuberculosis and Malaria under the Agreement between the Institute of Public Health of Serbia "Dr Milan Jovanović Batut" and the Ministry of Health of the Republic of Serbia, an expanded survey was implemented among men who have sex with men in three additional cities: Novi Sad, Niš and Kragujevac within the framework of the program 1802 "Preventive Health Care" Project 4013 - Support to the activities of citizens' associations in the field of prevention and control of HIV infection" in 2021. Periodic seroprevalence and behavioral surveys in key populations represent the basis for assessing the success of the implemented programs in achieving predefined strategic and program goals.

The national guide for the treatment of persons infected with HIV was developed during 2023, as well as an expert methodological guidelines for the use of post- and pre-exposure prophylaxis with antiretroviral drugs to prevent HIV infection in persons exposed to the virus (PEP and PrEP).

At the beginning of 2024, expert guidelines for voluntary and confidential counselling and testing for HIV infection, viral hepatitis B and C and other sexually transmitted infections were developed, which was presented and disseminated to colleagues from health institutions where free voluntary and confidential, i.e. anonymous counselling and testing for HIV infection, viral hepatitis B and C and other sexually transmitted infections is available without a doctor's referral, as well as to associates from associations that carry out this activity among key populations at risk in the community.

In the period 2019-2025 every year 12 public health institutes of public health, on average, implemented the World Contraception Day Campaign (September 26) each year. Within the framework of the campaign, an average of 148 organizational meetings and 86 lectures were held, there were an average of 73 presentations in the media, 156 presentations on websites, an average of 3,646 individual and 408 group forms of health education work were implemented, 120 public events, 116 exhibitions were prepared, an average of 9 forums were held per year, 3 conferences for the media, 8,452 health promotion materials were distributed, and an average of 86 partners in the local community were involved

The Institute of Public Health of Serbia "Dr Milan Jovanović Batut" regularly collects and publishes data within the Health Statistical Yearbook, which refers to data on:

- population and vital statistics
- Women of reproductive age (15 to 49 years) make up 21% of the population.
- Data show that Serbia still has a low birth rate - an average of 9.2 live births per 1,000 inhabitants.
- Natural growth is negative and in 2024 it will be -5.7 per 1,000 inhabitants, which is a slightly worse result than in 2023 (-5.4).
- Infant mortality:
- The infant mortality rate in 2024 was 4.6/1,000 live births.
- In the past 20 years (2005–2024), the infant mortality rate in the Republic of Serbia has decreased by 42.5%.
- Nearly two-thirds of infant deaths occur in the neonatal period (up to 28 days of life).
- The neonatal and early neonatal mortality rates in the Republic of Serbia also have a continuous downward trend, and in 2024 they will be 2.9 and 2.1 per 1000 live births, respectively
- Maternal mortality:

- The maternal mortality rate (pregnant and postpartum) has shown a downward trend in the past decade, with a sharp jump in values in 2021 estimated as a consequence of the impact of the COVID-19 pandemic.
- The maternal mortality rate was also worrying in 2024, at 16.4/100,000 live births.
- births and abortions
- Number of births and newborns:
- In 2024, 58,080 births were recorded, with a total of 59,232 children born, including 354 stillbirths.
- There were 58,878 live births, of which 65 newborns died,
- Age group of mothers:
- The largest number of births was registered among mothers belonging to the age group of 30 to 39 years (29,466), followed by births among mothers aged 20 to 29 years (24,550), and then in the group of 40 to 44 years (3119).
- Birth order:
- First births were 50.3%, second births were 32%, third births were 12.4%, and higher births were 5.3%.
- Previous abortions
- Most women (86.8%) had no previous abortions, 9.8% had one abortion, and 3.3% had two or more abortions.
- Newborn weight:
- Most newborns (93.5%) had a birth weight of 2,500 grams or more. Most children were born weighing between 3,000 and 3,499 grams (38.5%), while 6.5% had low birth weight (below 2,500 grams).
- Abortions:
- During 2024, 11,989 abortions were reported, with medical abortions accounting for 55.4% (6,637 cases), and spontaneous abortions and other abnormal pregnancy outcomes accounting for 44.6% (5,352 cases).
- indicators of provision, burden and use of primary health care for women
- The Women's Health Care Service provides specific health care to the female population over the age of 15. Health services in this service were provided by 515 doctors in 2024, of which 406 (79%) were specialists. There were 5672 women of the specified age per doctor in the Women's Health Care Service.
- The total number of visits to doctors in the practice was 1,396,352, of which 41% were first visits. The average number of visits per doctor (in the office) in the women's health care service was 2711. The average number of visits to doctors (in the office) per woman was 0.5 at the national level.
- An additional 1,076,637 visits were made by other health care workers. 8074 home visits were provided, as well as 313,933 preventive examinations.
- The total number of identified diseases, conditions and injuries in the women's health care service during 2024 was 978,037. The most common reasons for visits were various types of examinations, including control examinations, examinations in case of suspected disease, screening examinations, etc.
- relating to the recording and monitoring of leading chronic non-communicable diseases and infectious diseases,
- Malignant breast tumors are the leading cause of the burden of malignant tumors in women in Serbia. Based on data from the Registry of Persons with Malignant Tumors in Serbia, in 2022, 4489 new cases and 1646 deaths of women from breast cancer were registered.
- According to data obtained through epidemiological surveillance, there has been an increase in syphilis, as well as the number of newly diagnosed HIV-infected persons, as

well as deaths from AIDS, and a decrease in the number of registered cases of gonorrhea and genital chlamydia in the last 10 years on the territory of the Republic of Serbia.
During 2024, 42 new cases and 10 deaths from AIDS were registered which relate to the attitudes, knowledge and habits of the adult population in the Republic of Serbia regarding sexual behavior and which represent the results of the "Serbian Population Health Survey, 2019" - the fourth national health survey of the Serbian population, conducted on a representative sample by the Republic Statistical Office of Serbia in cooperation with the Institute of Public Health of Serbia "Dr Milan Jovanović Batut" and the Ministry of Health of the Republic of Serbia. The survey was conducted according to the European Health Interview Survey – EHIS wave 3 methodology, which is of key importance for providing data on the health of the population of the Republic of Serbia that is harmonized and comparable with data from health surveys in European Union countries. The Fifth National Health Survey of the Population of Serbia is currently being conducted.

According to the 2019 Survey, 26.8% of young people in Serbia aged 15–19 have engaged in sexual intercourse, with more boys than girls (29.5% versus 24.5%). Compared to 2013 (33.1%), there has been a decrease in the percentage of young people aged 15–19 who have engaged in sexual intercourse. About 2.9% of young people had sexual intercourse before the age of 15, 55.6% used a condom during their last sexual intercourse. In the adult population aged 20 and over, condom use with a casual partner decreases with age and is significantly less common among residents with lower educational status and lower incomes. Compared to 2013, there is an increase in condom use during their last sexual intercourse with a casual partner (50.5% compared to 43.3%).
In the population aged 15–49 who had sexual relations with multiple partners in the year preceding the Survey, only slightly more than half (60.6%) used a condom during their last sexual intercourse. More frequent condom uses during the last sexual intercourse among people who had more than one sexual partner was registered among young people aged 15–24, among those with the highest household income, and in cities.
Two-fifths of women aged 15–49 (40.4%) who were sexually active in the observed period used some contraceptive means or method (pill, intrauterine device, hormonal injection, hormonal implant, diaphragm, foam or gel, female or male condom, female or male sterilization). Women with lower education (24.7%) and women from the poorest households (26.3%) used contraception significantly less. In the same age group of women who are married or living in an extramarital union, the percentage of those using contraceptives is lower and amounted to 34.8%. Unreliable methods of contraception (infertile days, withdrawal, morning-after pill) were used by 17.1% of women aged 15–49. Of the total number of women aged 15–49, 1.1% reported having had an intentional termination of pregnancy in the year preceding the 2019 Survey (0.9% of girls aged 15–19). Intentional termination of pregnancy was more common among women with lower education (2%).
During 2025, the Institute of Public Health of Serbia "Dr Milan Jovanović Batut" prepared an analysis of antenatal care for women within the project "Enhancing Maternal Health: Antenatal Care Analysis and Improving Antenatal Electronic Health Records Focused on Risk Scoring System Implementation" whose overall goal is to improve the quality of care for pregnant women, mothers and newborns by implementing new and innovative approaches that strengthen the prevention and management of high-risk pregnancies throughout the entire period and contribute to the reduction of maternal and perinatal morbidity and mortality. The project is divided into 2 parts.

The first part refers to the assessment of activity and efficiency, i.e. the assessment of access and quality of antenatal and postnatal health care, as well as the preparation of recommendations for further improvement of the health system in this area.
The second part refers to the development of a data set for the women's health record with a special focus on the pregnancy control sheet, as well as the implementation of a digital scoring system for the management of high-risk pregnancies at the primary health care level to be defined by the Working Group of Gynecologists established by the Ministry of Health.

- Please inform on the start of implementation of the new action plan for the implementation of UN Security Council Resolution 1325 on Women, Peace and Security.

The Ministry of Defense

The Government of the Republic of Serbia adopted the National Action Plan for the Implementation of UN Security Council Resolution 1325 on Women, Peace and Security on 11th April 2025.
Its implementation started in 2025, and annual reporting on the execution of the NAP is scheduled for 2026.
Activities related to the establishment of institutional bodies, mechanisms and actors for its implementation, as well as the organisation of training and the preparation of meetings, are underway. In October 2025, the Ministry of Defence of the Republic of Serbia hosted the international Conference "From Adoption to Implementation - 25 Years of UN Security Council Resolution 1325 in Practice", within the framework of the two-year chairmanship of the project "Women Leaders in the Security and Defence Sector". Several training events have been conducted for primary peer support mechanisms and other actors on the norms of anti-discrimination legislation and the mediation procedure. Preparations are being made to arrange meetings of contact persons for the execution of the NAP, as well as for numerous other activities envisaged by the NAP (2025-2027).

- Please provide an update on setting up a technical body and a cross-sectoral group to support the work of the Council on the Rights of the Child.

Ministry of Family Welfare and Demografy

The Council on the Rights of Child has been not (re)founded yet. Set up by the Ministry concerned, the Council is an advisory body of the Government, but not mandatory, which should suggest and deal with measures and activities for the improvement of child's protection in accordance with, among others, international standards. This kind of mechanism should benefit from its members being not only from institutions, but civil society and academia also. However, the whole process of the setting is on pending now.

- Please inform on the process and timeline for drafting, consulting on, and adopting the new strategy and action plan related to violence against children.

Ministry of Family Welfare and Demografy

ALREADY ANSWERED – FIRST QUESTION

- Please provide an update on adopting a new national plan of action for children.

Ministry of Family Welfare and Demografy

This is UNICEF mechanism. The RS joined the last Plan of Action few years ago, but this document is expired now. In this moment, no plans for further motion in terms of a new plan in contacts with UNICEF.

- When does Serbia plan to ratify the UN Convention on the Rights of the Child's third optional protocol on a communication procedure, which it signed in 2012?

Ministry of Human and Minority Rights and social Dialogue

Adoption of the Draft Law on the Ratification of the Optional Protocol to the Convention on the Rights of the Child on Communication Procedures, according to the plan of the Ministry of Human and Minority Rights and Social Dialogue, is planned for the fourth quarter of 2025.

- Following the adoption of a general protocol for the protection of children from abuse and neglect in February 2022, were new sectoral protocols adopted?

Ministry of Education

Considering that the General Protocol for the Protection of Children from Violence was adopted by the Government of the Republic of Serbia in 2022, in 2024 the Ministry of Education amended and harmonized the bylaw regulating the conduct of employees in educational institutions in the field of protecting children from violence with the aforementioned protocol. The Regulation on the Protocol of Conduct in Institutions in Response to Violence, Abuse and Neglect ("Official Gazette of the Republic of Serbia", No. 11 of February 14, 2024) precisely defines the steps of action of employees in the field of prevention, but also intervention when there is suspicion or knowledge of a situation of violence in an educational institution. The obligations of employees in providing support to children who have suffered and committed violence, through a protection plan, or a plan of enhanced educational work, are clearly defined. It was also determined in which situations of violence school employees turn to other competent institutions for support and involvement (primarily the social and health care system, police and prosecutor's office), in order to undertake activities within their jurisdiction.

Ministry of Family Welfare and Demografy

The Government of the Republic of Serbia, at the proposal of the Ministry of Family Care and Demography, adopted the General Protocol for the Prevention and Protection of Children from Violence in 2022. Based on the General Protocol, other ministries should adopt special protocols within their jurisdiction. The amendments to the General Protocol in 2024 set a deadline for the adoption of special protocols, which was March 31, 2025. We note that these are the following ministries, responsible for: education and upbringing, youth and sports, health, justice, internal affairs, social protection (THE ONLY ONES THAT HAVE FULFILLED THE OBLIGATION), culture, trade, tourism and telecommunications, transport.

Ministry of Labour, Employment, Veterans and Social Affairs

„In October 2024, a new Special Protocol for the Protection of Children against Violence in the Field of Social Protection was adopted https://www.minrzs.gov.rs/sr/dokumenti/ostalo/sektor-za-socijalnu-zastitu/posebni-protokol-za-zastitu-dece-od-nasilja-u-oblasti-socijalne-zastite . This Protocol is aligned with the General Protocol for the Protection of Children against Violence. It has been distributed to all centres for social work and all service providers working with children with an order for further action in accordance with it."

- Please provide disaggregated statistics on cases of violence against children (in 2025, or 2024 if not yet available).

Republic Institute for Social Protection

The source of these data are the Annual Reports of the Centers for Social Work; however, for 2024 only 70 out of 170 departments of the Centers for Social Work in Serbia submitted their reports. Due to insufficient coverage, the data for 2024 are not representative and therefore not suitable for publication.

- Please inform on the process and timeframe for drafting, consulting on, and adopting amendments to the family law.

Ministry of Family Welfare and Demografy

After several attempts in the past, an engagement on drafting the Amendments of Family Law has been reactivated at the end of 2025 by an initial phase in the creation of relevant Working Group. Members of the Group from civil society were selected in cooperation with the Ministry of Human and Minority Rights and Social Dialogue. Responsible Ministries and other institutions submitted names of their representatives for the Group also. On January 12th 2026, the decision on the Working Group has been not signed yet by the Minister of Family Welfare and Demography.

- Please inform on the process and timeline for drafting, consulting on, and adopting the pending action plan relating to the strategy on de-institutionalisation and the related legislative reforms, e.g. on supported decision making. Please also provide updated data (in 2025, comparing with 2024) on institutionalisation and the use of community-based services.

Ministry of Labour, Employment, Veterans and Social Affairs

Significant progress has been made in recent years: the number of licensed service providers has increased from 1 (2013) to 338 (2023), services are present in over 90% of municipalities, and the sector employs more than 9,000 workers. Provider pluralism has been developed, with the private and civil sectors taking on a dominant role. Since 2016, the state has supported the development of services through earmarked transfers, in an average annual amount of around 600 million dinars.
Although the community-based services system is strengthening, the coverage of residential care for the elderly remains low (around 1%). The number of places in

private homes is growing, while in the EU the coverage is significantly higher (3.8%). The rate of children in care in 2022 was the lowest in the last decade, but an increase in the number of children separated from their families was recorded in the same year. The number of services that prevent institutionalization is growing, but supported housing, day care, respite and shelter services remain underdeveloped.

To strengthen the legal protection of beneficiaries in institutions, the Law on Temporary Care Residents has been in implementation since 2022, which defines residential care as a measure of last resort and introduces a more transparent system with the possibility of monitoring by civil society organizations. This Law introduces for the first time the definition of deinstitutionalization into the legal framework of Serbia – "deinstitutionalization is a process aimed at preventing placement in social protection institutions and preparing beneficiaries of temporary accommodation services for their return to the natural environment, which is achieved through the development of community-based services, their sustainable financing, respect for the rights of beneficiaries to their own choice and participation in decision-making processes".

Financial support for the establishment and development of community-based services is provided from various sources of funding – local self-government funds, donations to non-governmental organizations, beneficiary participation, funds from private providers, earmarked transfers from the national budget, international aid funds (IPA, etc.), etc.

The Action Plan 2025–2026 serves to operationalize the objectives of the Strategy and enables efficient resource planning. The plan follows one general and five specific objectives: (1) normative and financial assumptions, (2) balanced development of services, (3) transformation of residential institutions, (4) empowerment of beneficiaries for community life, and (5) strengthening of professional capacities. Measures and activities are foreseen for each objective that follow the structure of the Strategy.

The Proposal Action Plan was subject to public debate from 21 January to 12 February 2025. The working group for the development of the plan consisted of representatives of ministries, provincial and city authorities, institutes, academia, civil society organizations and international partners. The development of the document was implemented with the support of German-Serbian development cooperation projects.

The Action Plan 2025-2026 for the implementation of the Strategy for Deinstitutionalization and Development of Community-Based Social Protection Services 2022–2026 was adopted at the session of the Government of the Republic of Serbia on 27 November 2025.

Within the framework of the implementation of the IPA 2020 Programme - "Modernisation of Social Protection Systems", funds have been provided for the implementation of activities defined by the Action Plan within the framework of the service contract "Improving and strengthening efficiency of national social protection regulatory mechanisms, policy implementation tools, quality assurance framework and strengthening capacities to participate in ESF", as well as within the framework of the direct grant contract to the Standing Conference of Towns and Municipalities "Support to sustainable community-based social protection services and inclusion policies at the local level".

Part of the activities were funded by donor funds from the Project "Support to Social Inclusion in Serbia", which is the result of the commitment of the Federal Republic of Germany and the Federal Ministry for Economic Cooperation and Development (*BMZ*) to continue providing support for the social and economic inclusion of vulnerable and

marginalized groups in Serbia, and builds on the results of the project "Social Protection Services for Vulnerable Groups".
Key achievements during the three-year period of implementation of the Strategy lie in the increase in the number of licensed social protection service providers, which has been accompanied by an increase in the number of service beneficiaries. The number of municipalities in which licensed services are provided has also increased, and the number of employees providing the services has also increased. Pluralism of service providers has also been achieved, and providers from the real rather than the public sector now dominate.
Challenges, on the other hand, lie in achieving more equal access to services, especially in rural areas, establishing licensed services in municipalities where no service has yet been established, ensuring uniformity of services by age categories of beneficiaries and by types of services, standardizing new services, increasing the representation of women among service providers and beneficiaries, increasing the allocation of funds for the development of community-based services, as well as integrating services from different sectors in accordance with the individual needs of each beneficiary.

- Please provide an update on the drafting and adoption of implementing legislation (including the draft Rulebook on the actions of social protection institutions and service providers in incident situations mentioned in last year JLS subcommittee) since the adoption of the law on temporary social care residents in December 2021.

Ministry of Labour, Employment, Veterans and Social Affairs

The Law on Temporary Care Residents was adopted on 15 December 2021 and published in the *Official Gazette of the Republic of Serbia* No. 126/21, entering into force on 31 December 2021. It regulates:

- the manner of exercising the rights of beneficiaries of temporary accommodation;
- the rights and obligations of beneficiaries and service providers;
- procedures for accommodation and preparation of beneficiaries for life in the community;
- protection from abuse, exploitation and neglect;
- handling of incident situations of immediate danger to life or safety.

Although the 2021 Law prescribes the obligation to regulate handling of incident situations, the Rulebook specifically for incident situations (rigorous procedures, protocols, responsibilities) in an officially published database of regulations, it has not yet been separated as an independent, published Rulebook in the *Official Gazette of the Republic of Serbia* or on official portals. Handling of such cases has mainly been implemented through its specification through: standard operating procedures within institutions (to ensure safety, report abuse, protect beneficiaries), internal instructions, or instructions and risk assessments and protection plans within social protection institutions and with licensed service providers.
The delay in adopting the Rulebook on Incident Situations is not the result of an isolated factor, but the result of a complex process that requires comprehensive harmonization before its adoption. In cooperation with the Council of Europe, namely its office in Serbia, the possibility of expert support was considered in the following segments:

assessment of existing procedures in social protection institutions, drafting a rulebook with specific procedures for incident situations, alignment with EU standards, as well as recommendations for training of employees and professional services in the institutions.

- Please provide information on the state of play of alignment with the EU *acquis* on accessibility, i.e. Directive (EU) 2019/882 ("European Accessibility Act")[5], the Web Accessibility Directive (EU) 2016/2102[6], as well as sectoral EU law containing obligations on accessibility (such as the Electronic Communications Code (Directive 2019/1972), the Audiovisual Media Services Directive (Directive 2010/13/EU), the public procurement directives (Directive 2014/24 and 2014/25) and copyright legislation (Directive 2017/1564 and regulation 2017/1563). Beyond these mandatory legal requirements in the EU, what measures on improving accessibility for persons with disabilities have been adopted or are planned? Since Serbia's self-assessment of January 2025 mentions measures related to the accessibility of the built environment, has the voluntary European Standard EN 17210 on accessibility and usability of the built environment been considered?

Ministry of Information and Telecommunications

Media laws provide for provisions that further enhance the right of persons with disabilities to access information. The Law on Public Information and Media, in particular, explicitly regulates this matter in Article 12, which governs the exercise of the rights of persons with disabilities. It stipulates that the Republic of Serbia, the autonomous province, or a unit of local self-government shall undertake measures to enable persons with disabilities to receive information intended for the public without hindrance, in an appropriate format and through the application of suitable technology. Furthermore, it provides for the allocation of a portion of funds or other necessary conditions to support the operation of media outlets that publish information in sign language or Braille, or that otherwise enable persons with disabilities to exercise their rights in the field of public information without obstacles. In addition, the Republic of Serbia undertakes measures to ensure that informational, educational, cultural, and entertainment content is accessible to persons with disabilities.

The Law further provides that the public interest in the field of public information includes support for the production of media content intended for persons with disabilities, as well as the adaptation of content into Serbian sign language, Braille, audio description, and other appropriate formats for persons with sensory and intellectual disabilities. In accordance with the Law and Article 19, the Republic of Serbia announces a public call in order to ensure conditions for the operation of media outlets that provide information to persons with disabilities. Under the Call for the Co-financing of Projects for the Production of Media Content Intended for Persons with Disabilities in 2025, 44 projects were supported, in a total amount of 25.000.000,00 dinars.

[5] Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services (Text with EEA relevance): https://eur-lex.europa.eu/eli/dir/2019/882/oj/eng

[6] Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies (Text with EEA relevance): https://eur-lex.europa.eu/eli/dir/2016/2102/oj/eng

The Law on Electronic Media provides that the Regulator shall encourage the improvement of the accessibility of media services for persons with disabilities. Furthermore, Article 73 of this Law stipulates that a media service provider is obliged, in accordance with its financial and technical capacities, to make its programme and content accessible to persons with hearing or visual impairments, and to continuously work on the inclusion of Serbian sign language, open and closed captions, and audio description. In addition, media service providers are specifically required to ensure that persons with disabilities receive emergency information of importance for life and health. The Regulator encourages media service providers to make their programmes and content accessible to persons with disabilities. Media service providers are obliged to report annually to the Regulator on the measures undertaken, no later than 1 September.

The Law on Public Service Media provides that the public interest fulfilled by public service media through their programming includes meeting the information needs of all segments of society without discrimination, with particular attention to socially vulnerable groups such as children, youth and the elderly, minority groups, persons with disabilities, and socially and health-vulnerable persons, among others. This Law also prescribes an exemption from the obligation to pay the public service media fee for a natural person who is the holder of an electricity meter and who lives in a single-member household or is the breadwinner of a multi-member household, provided that the person is a person with a disability with 100% bodily impairment, or a person with a disability with less than 100% bodily impairment if, in accordance with the provisions of special regulations, they have been granted the right to an allowance for assistance and care by another person.

The regulation of the rights of end-users with disabilities in the field of electronic communications is governed by the Law on Electronic Communications ("Official Gazette of the Republic of Serbia", No. 35/23), which is to a large extent aligned with the provisions of the European Electronic Communications Code (Directive (EU) 2019/1972).

End-users with disabilities enjoy special protection starting from Article 7, paragraph 4 of the Law on Electronic Communications, which generally regulates the measures undertaken by the Regulator in order to achieve the objectives of this Law, as well as Article 60 of the Law on Electronic Communications, which prescribes that universal service services include, inter alia, special measures ensuring equal opportunities for persons with disabilities and socially vulnerable consumers to access universal service services. In addition, the Law on Electronic Communications contains provisions relating to the protection of the rights of end-users as a whole, including persons with disabilities, as well as specific rights of persons with disabilities, bearing in mind that this category of end-users enjoys enhanced protection.

With regard to the provisions of the Law on Electronic Communications relating to the protection of end-user rights, Article 126, paragraph 2, item 13) of this law stipulates that providers of internet access services and publicly available interpersonal communications services are, inter alia, obliged to provide information relating to the regular informing of end-users with disabilities about products and services specifically adapted for their use, including the manner of obtaining up-to-date information regarding details of products and services. All information on contractual conditions shall be provided upon request, in a manner and format accessible to end-users with disabilities (paragraph 6 of the same Article).

Furthermore, in accordance with Article 127 of the aforementioned law, service providers are required to state, in the contract terms, in a clear, unambiguous, machine-readable

manner and in a format accessible to end-users with disabilities, information relating to the service provider's contact details and a description of the services offered. This description includes, inter alia, details of products and services, including all options, practices, policies, procedures, and changes in the manner of service provision that are specifically designed for end-users with disabilities.

In addition, Article 128 of the law, which regulates the conclusion of contracts, prescribes, that a short and easily readable contract summary, which the service provider is obliged to provide to consumers free of charge prior to the conclusion of the contract, shall also contain information on the availability of services for end-users with disabilities, as well as information on the most important products and services (specialized equipment, special tariffs, communication with emergency services, etc.).

Article 136 of the Law on Electronic Communications regulates the provision of accessibility of services and terminal equipment to end-users with disabilities.

Pursuant to the authorizations prescribed by the law, the following by-laws regulating the relevant subject matter have been adopted:

1. Rulebook on Universal Service in the Field of Electronic Communications ("Official Gazette of the Republic of Serbia", No. 62/24);
2. Rulebook on the Method of Determining the Obligation to Provide Universal Service, the Level of Detail and the Method of Publication of Data on Universal Service Offers ("Official Gazette of the Republic of Serbia", No. 61/24);
3. Rulebook on Information on Contractual Conditions Which Providers of Publicly Available Electronic Communications Services Are Required to Publish, the Manner of Their Publication and Deadlines, the Contract Summary Template, and the Content of Notifications on the Intention of Unilateral Amendments to Contractual Conditions and the End-User's Right to Terminate the Contract before the Expiry of the Contractual Term ("Official Gazette of the Republic of Serbia", Nos. 98/24 and 45/25);
4. Rulebook on the Method and Conditions for the Allocation and Use of Numbers from the Numbering Range Beginning with 116 ("Official Gazette of the Republic of Serbia", No. 83/24);
5. Rulebook on Access to Emergency Services ("Official Gazette of the Republic of Serbia", No. 87/24);
6. Rulebook on the Obligations of Operators Transmitting Value-Added Services and Providers of Value-Added Services ("Official Gazette of the Republic of Serbia", No. 30/25);
7. Rulebook on Ensuring the Accessibility of Certain Electronic Communications Services and Corresponding Terminal Equipment for End-Users with Disabilities ("Official Gazette of the Republic of Serbia", No. 20/25, applicable as of 1 June 2026).

Ministry of Public Administration and Local Self-Government

Serbia's Law on Electronic Government establishes the general legal framework for the provision of public services by electronic means and introduces accessibility as a horizontal principle of e-government. The Law requires that electronic services be developed and delivered in a manner that ensures equal access for all users, including persons with disabilities, by preventing technical, audiovisual, semantic, and language barriers. In this

respect, the Law reflects the core objectives of the EU Web Accessibility Directive (EU) 2016/2102, particularly as regards non-discriminatory access to public-sector digital services, and is aligned with relevant EU standards and principles in the field of digital accessibility.

The Law is complemented by secondary legislation regulating the web presentations of public authorities, which sets out detailed rules on the structure, content, and maintenance of official government websites. This by-law contains specific provisions on website accessibility and establishes mechanisms for regular compliance assessment, including periodic self-assessment by public authorities and reporting at central level. These arrangements support a consistent and structured approach to improving the accessibility of public-sector websites, in line with EU standards and European good practice. By law on web presentations addressing the accessibility of public-sector digital services and websites and provide a clear legal basis and institutional set-up. This framework provides a clear basis for further alignment with the EU acquis on accessibility and demonstrates Serbia's commitment to progressively strengthening inclusive access to e-government services.

3.4. Protection of personal data (PDP) – *implementation of the new PDP strategy and action plan, and of the PDP law and its revision*

- As discussed during the VTC meeting on Chapter 23 interim benchmarks on 17/10/2025, please provide a summary in English, covering at least how indicators were achieved, of the 2024 annual implementation report on the strategy and action plan on personal data protection.

Ministry of Justice

The Government of the Republic of Serbia has decided to establish a Working Group for monitoring and implementing measures and activities envisaged by the Personal Data Protection Strategy (hereafter PDP Strategy). The decision was published in the Official Gazette No. 8/25 on January 24, 2025. The aforementioned Working Group is also envisaged by Part 6 of the PDP Strategy as a mechanism for monitoring the implementation of the PDP Strategy and the accompanying Action Plan.

The new accompanying Action Plan (2025-2027) for the implementation of the Personal Data Protection Strategy (2022-2030) was adopted by the Government on March 6th, 2025.

There are no reports on the implementation of the Personal Data Protection Strategy for the period from 2023 to 2030, as the process of changing the members of the Government Working Body responsible for monitoring the implementation of the Strategy is currently ongoing. This is due to the fact that the members of the Working Body are representatives of institutions and personnel changes have occurred among the appointed members in previous period.

Commissioner for Information of Public Importance and Personal Data Protection

The Action Plan for the Implementation of the Personal Data Protection Strategy in the Republic of Serbia for the period 2023-2030 ("Official Gazette of the Republic of Serbia", No. 7/2023) was not adopted in 2024 for reasons within the competence of the Ministry of Justice. The Action Plan for the period 2025-2027 for the implementation of the Personal Data Protection Strategy was adopted by the Government in 2025.

The Strategy, as one of its specific objectives, stipulates: "Improved awareness of the importance of personal data protection and ways to exercise rights", and, among others,

also provides for "Measure 5.2.2: Professional development of public administration employees in the field of personal data protection".
In implementing the above-mentioned specific objective and measure, the Commissioner, in agreement with the National Academy of Public Administration (NAPA), implements training for representatives of controllers and processors, primarily for persons who have already been designated for the protection of personal data or for those who will be designated, for these persons to acquire new and build on existing knowledge about the right to the protection of personal data and to become more familiar with the obligations of controllers and processors of personal data in accordance with the Law on Personal Data Protection.
The Commissioner also independently, in accordance with the powers and duties prescribed by the provisions of the Law on Personal Data Protection, implements training in the field of implementation of the Law, a recapitulation of the training held in the field of implementation of this law, with special emphasis on the importance of the Strategy and the deadlines and activities prescribed by the Action Plan, by the Education and Certification Sector in 2025, is as follows:
August, 13, 2025 - training for the Public Utility Company "Belgrade Water Supply and Sewerage" - 100 persons/training participants.
October 24, 2025 - training for new employees in the Commissioner's Office - 7 persons/training participants.
October 29, 2025 - training for employers in Ruma - 20 persons/training participants.
November 24, 2025 - training for the highest authorities (in cooperation with the Ministry of Human and Minority Rights) - 60 persons/training participants.
November 26, 2025 - training for the highest authorities of local self-government (in cooperation with the Ministry of Human and Minority Rights) - 95 persons/training participants.
November 28, 2025 - training for representatives of civil society organizations (in cooperation with the Ministry of Human and Minority Rights) - 60 persons/training participants.

- Please provide updated data on the number of designated data protection officers within public entities.

Commissioner for Information of Public Importance and Personal Data Protection

According to data from the Commissioner's records, the total number of appointed (designated) persons for personal data protection in government bodies, as of January 9, 2026, is 4,300 persons.

- Please provide an update on staffing in the Commissioner’s Office, in light of the 129 staff target in Chapter 23 action plan.

Commissioner for Information of Public Importance and Personal Data Protection

As of January 9, 2026, there are 132 employees in the Commissioner for Information of Public Importance and Personal Data Protection.

- Please inform on the process and timeline for drafting, consulting on, and adopting amendments to the Law on personal data protection.

Ministry of Justice

The Special Working Group for drafting amendments and supplements to the Law on Personal Data Protection was formed and is still working on the preparation of these amendments and supplements or on the text of a new law, in the case the amendments prove to be more extensive. The adoption of this law is planned for the fourth quarter of 2026.

- Please inform in case of the development of a legal basis for processing biometric data and video surveillance. Please inform about the links with the process of drafting a new law on internal affairs and related consultations with the Commissioner for personal data protection.

Ministry of Interior

There has been no activity by the Ministry of Interior to specifically regulate the field of biometric data processing through video surveillance in the Draft of the new Law on Internal Affairs.

Commissioner for Information of Public Importance and Personal Data Protection

The legal basis, in terms of the existence of a special law that would regulate the processing of biometric data (in general and through video surveillance that would have this possibility), does not yet exist. The field of video surveillance is partially regulated by the Law on Police and the Law on Private Security, but the Commissioner believes that it is necessary to add provisions to the Law on Personal Data Protection that would set appropriate "protective boundaries" and regulate the basic principles of processing personal data in the above-mentioned manner. In this regard, appropriate provisions have been added to the draft text of the new Law on Personal Data Protection. As for the process of drafting the new Law on police, according to the Commissioner's knowledge, the process is currently at a standstill, and if it is activated, we expect the Ministry of the Interior to request consultations with the Commissioner, as they have done so far.

- Please update on the state of play with regard to actions taken to investigate potential abuses of use of spyware and mobile phone forensic products to unlawfully target journalists, environmental activists and other individuals, as notably reported by Amnesty International and in light of the European Commission’s recommendations in relation to upholding EU principles and values, including those related to personal data protection, and to seriously investigating these allegations. Please also inform about the status of the cases on this matter which were opened by the Ombudsman and by the Commissioner for Personal Data Protection. *[Please also see questions under agenda point 9.1]*

Commissioner for Information of Public Importance and Personal Data Protection

The Commissioner, in accordance with his powers prescribed by law, based on the complaint he received, formed a case in which he obtained the necessary data and statements from the controller and the competent authorities that process data for special purposes, based on which he concluded that in specific cases no measures or actions were taken that would constitute

unauthorized or unlawful processing of personal data, and that any actions taken by the competent authorities were carried out exclusively within the framework of the powers prescribed by law and the procedures that apply when processing is carried out by the competent authorities for special purposes. Taking into account the above, the Commissioner did not establish the existence of facts that would indicate the conditions for undertaking other powers of the Commissioner, including inspection supervision, had been met, of which he informed the complainant. We note that none of the individuals mentioned in the Amnesty International report have contacted the Commissioner regarding the protection of their rights.

- Please inform on any cases handled by the Commissioner for Personal Data Protection regarding leaks to the media, allegedly by the authorities, of the personal data of participants in protests.

Commissioner for Information of Public Importance and Personal Data Protection

In connection with the leakage of data, including personal data, of protest participants in the Republic of Serbia in the media, which is suspected to have originated from government authorities, the Commissioner conducted a total of 5 (five) cases during 2025.

1. In the case of making available to a third party a photographic record of a person from a video surveillance system carried out by a controller in the performance of tasks prescribed by law, i.e., publishing a photograph of a person on the portal of a public media outlet.

   The Commissioner has ex officio initiated an extraordinary field inspection procedure. During the inspection procedure, it was not possible to determine with complete certainty who had unauthorizedly undertaken this action of processing personal data – the controller or the recipients of the data, which is why the controller was given a corrective measure of warning for failing to take the prescribed measures to protect the personal data it processes.

2. A complaint from a foreign citizen alleging a violation of his personal data by the public publication of his personal document on an electronic medium in the Republic of Serbia by a third party, expressing suspicion that this was enabled by a legal entity - the accommodation service provider, to whom the personal document was presented during a recent stay in the Republic of Serbia

   In this case, the Commissioner carried out an extraordinary inspection of the controller, during which it was determined that the controller did not deviate from the prescribed procedures in fulfilling the obligations prescribed by law, taking into account the fact that the controller is obliged to deliver data to the recipients specified by law. No measure was imposed in this case, but the complainant was informed of the Commissioner's actions. The national data protection authority of the country whose citizen is in question was also informed that the inspection determined that the controller did not store (storage) the personal document of the complainant in its original form, but rather, using the software it uses in its business, loaded from the personal document the data necessary to comply with its legal obligations established by regulations in the field of tourism and hospitality.

3. On the occasion of the publication of the first pages of the passports of two individuals on the portal of the daily newspaper

To collect data relevant to conducting a possible extraordinary inspection, the Commissioner requested a written statement from the alleged data controller.

The controller, acting on the Commissioner's order, submitted notifications that it had conducted internal procedures to verify the allegations in its internal organizational units and that no violation of the law had been established in the specific case. In this regard, taking into account the statutory competences, tasks, and powers of the Commissioner, it was not possible to determine whether and who had submitted the data in question, which were then published on the portal of the daily newspaper. This is especially true since the Commissioner's powers under the Law on Personal Data Protection, when it comes to the processing of personal data by the media for notification and information, are limited, and since the persons to whom the data relate did not contact the Commissioner to protect their rights.

4. In the case of video recording of public gatherings from the air (with a drone).

In a case initiated based on a citizen's complaint, after collecting data and analyzing the legal framework governing the use of drones and filming in public places, the case was concluded by delivering a notification to the complainant with information about their rights regarding the processing of personal data and the possibility of exercising these rights by sending a request to the data controller.

5. The Commissioner received a submission from a lawyer acting as a proxy stating that an authorized person of the operator recorded the deprivation of liberty of a citizen on a telephone and that the recording was forwarded to an electronic media outlet, which broadcast the recording.

Taking into account the information from the complaint and to collect data relevant to conducting a possible inspection, the Commissioner requested a statement from the controller regarding the allegations in the complaint.
In a written statement, the operator denied the allegations in the complaint.
Taking into account the allegations from the statement, it was determined that in the situation in question, there is no room for undertaking inspection and other powers within the competence of the Commissioner towards the controller, of which the complainant was informed.

3.5. Procedural rights for suspects and accused persons and victims' rights – *including implementation of the free legal aid law and implementation of the national strategy and the second action plan on victims and witnesses of crimes*

- As discussed during the VTC meeting on Chapter 23 interim benchmarks on 17/10/2025, please provide a summary in English, covering at least how indicators were achieved, of the 2024 annual implementation report on the national strategy on victims of crimes.

Ministry of Justice

The Republic of Serbia is currently in the process of finalizing the ex post analysis on the implementation of the National Strategy for the Rights of Victims and Witnesses of Crime in

the Republic of Serbia for the period 2020-2025. Once the analysis is completed and translated into English, it will be sent to the European Commission.

- Please inform on the process and timeline for drafting, consulting on, and adopting the new strategy and action plan on victims of crimes.

Ministry of Justice

The new National Strategy for the Rights of Victims and Witnesses of Crime in the Republic of Serbia with the accompanying Action Plan will be adopted by the end of I quarter of 2026. The formation of the Working Group for drafting the new strategic framework is currently underway. On 22 August 2025, a public call was published on the e-Consultations portal for all interested parties to submit their comments, proposals and suggestions for the drafting of the new National Strategy for the Rights of Victims and Witnesses of Crime in the Republic of Serbia with the accompanying Action Plan. Also, a Public call was issued for civil society organizations to submit candidacies for membership in the aforementioned Working Group. The Public call lasted from November 14 to November 28, 2025. One civil society organization that submitted its application and was elected was the Centre for Missing and Abused Children.

- Please provide an update on the progress since July 2025 in the setting up of the victims support services in the 25 high courts and on the appointment of victims support staff in 25 high courts in term of the legal, procedural, budgetary and human resource developments.

Ministry of Justice

Name of the Higher Court	Number of employees in the service
1. Higher Court in Belgrade	2
2. Higher Court in Novi Sad	1
3. Higher Court in Niš	4
4. Higher Court in Čačak	2
5. Higher Court in Užice	2
6. Higher Court in Zaječar	3
7. Higher Court in Sombor	3
8. Higher Court in Subotica	1
9. Higher Court in Požarevac	1
10. Higher Court in Vranje	3
11. Higher Court in Šabac	1
12. Higher Court in Zrenjanin	2
13. Higher Court in Kragujevac	4
14. Higher Court in Kraljevo	1
15. Higher Court in Novi Pazar	3
Total: 33	

- Please provide statistics on the number of victims supported by the 15 established victims support services.

Ministry of Justice

1. Higher Court in Belgrade

From its establishment in 2006 until 1 October 2025, a total of 6,005 witnesses have received support from Victim Support Service established at the Higher Court in Belgrade, of whom 1,279 have the status of injured parties.

2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
42	472	318	251	343	455	308	236	150	371

2016	2017	2018	2019	2020	2021	2022	2023	2024	2025 until 01.10.2025
327	397	305	350	212	403	321	310	293	141

2. Higher Court in Novi Sad

Statistical data:

-From June 2015 to January 2021, **123** hearings of particularly vulnerable witnesses were held in the Higher Court in Novi Sad via video link (with old equipment),

-in 2021, **104** hearings of particularly vulnerable witnesses were held in the "Screen Room" of the Higher Court in Novi Sad via video conference link,

- in 2022, **107** hearings of particularly vulnerable witnesses,

- in 2023, there were **126** hearings of particularly vulnerable witnesses.

- in 2024, **76** hearings of particularly vulnerable witnesses,

- from 1.1.2025 to 1.10.2025, **68** hearings of particularly vulnerable witnesses.

In total from June 2015 to 1 October 2025, **604** hearings of particularly vulnerable witnesses were held in the "Screen Room" of the Higher Court in Novi Sad through the Victim Support Service via video conference link.

3. Higher Court in Niš

In the previous period, no separate records were kept on the number of injured parties and witnesses who were provided with assistance and support, nor on the type of assistance and support provided.

Since December 2024, electronic records have been maintained, and for each witness and injured party a separate case file is created, in accordance with the Rulebook and the Court Rules of Procedure. In view of the above, we are providing data for the period from December 2024 to 1 October 2025:

- one victim in December 2024;
- seven victims in the period from 1 January 2025 to 1 October 2025.

4. Higher Court in Čačak

From the establishment of the Victim Support Service until 1 October 2025, there were no injured parties or witnesses who sought assistance.

5. Higher Court in Užice

From the establishment of the Victim Support Service until 1 October 2025, there were no cases of providing concrete support to victims and witnesses of crimes.

6. Higher Court in Zaječar

From the establishment of the Victim Support Service until 1 October 2025, there were no victims who contacted the service at the Higher Court in Zaječar.

7. Higher Court in Sombor

A separate record of the exact number of victims who were provided with assistance and support from the Victim Support Service has been kept by the Service itself, according to the statement of its Head, since last year. Since that moment, there has been no need to provide assistance and support, as there were no requests addressed to the Victim Support Service during that period.

Prior to that, according to the statement of the Head of the Victim Support Service at the Higher Court in Sombor, there were several requests per year (no fewer than five annually) from witnesses and injured parties seeking assistance and support from the Victim Support Service of the Higher Court in Sombor.

8. Higher Court in Subotica

From the establishment of the Victim Support Service until 1 October 2025, there were no injured parties or witnesses who sought assistance.

9. Higher Court in Požarevac

There have been no requests for assistance by the Victim Support Service from injured parties or witnesses since the establishment of the Service in 2013 until 1 October 2025.

10. Higher Court in Vranje

There are no records of the exact number of victims who were provided with assistance and support from the establishment of the Victim Support Service until the adoption of the Rulebook on Procedure and Functioning of the Service for Providing Support and Assistance to Victims and Witnesses of Crime and the Contact Points for Informing Victims and Witnesses of Crime by the High Judicial Council on 12 December 2024, as precise records were not kept.

However, approximately 5–6 victims per year received assistance and support. During 2025, there were three hearings in which assistance and support were provided; these concerned minors in criminal cases involving offences against sexual freedom.

11. Higher Court in Šabac

With regard to the number of victims who were provided with assistance from the establishment of the Victim Support Service, the following data is available:

- in 2019, there was one person;
- in 2020, there were no hearings conducted by the Service;
- in 2021, two persons;
- in 2022, two persons;
- in 2023, two persons;
- in 2024, three persons;
- in 2025, two persons,
  which amounts to a total of **12 persons**.

12. Higher Court in Zrenjanin

The Victim Support Service was established in 2024, and in the course of 2025, until 1 October 2025, assistance and support were provided in three cases, with a total of three victims.

13. Higher Court in Kragujevac

In the period from the establishment of the Service until 1 October 2025, assistance and support were provided to a total of eight persons: one person in 2015, one person in 2018, three persons in 2023, one person in 2024 and two persons in 2025.

14. Higher Court in Kraljevo

Since the establishment of the Victim Support Service at the Higher Court in Kraljevo, a total of five persons have received assistance. In 2024, two injured parties benefited from the help of the Service, while in 2025, three injured parties received assistance.

15. Higher Court in Novi Pazar

As of 1 October 2025, a total of 12 victims have been recorded as having received assistance and support. Please note that these are cases that span several years, so the same individuals may appear in the records at different stages of the proceedings, depending on the needs and the dynamics of the trial.

Statistics by year is the following:

2021: 1 victim; 2022: 4 victims; 2024: 6 victims; 2025 (as of October 1st): 1 victim.

- Please provide statistics on the number of criminal and civil cases which have included compensation for victims of crime.

Supreme Court

As earlier explained the Court Rules do not provide for the collection of statistical data concerning the proceedings for compensation for victims (on the basis of damages claims of injured parties) of crime, nor it is enabled by the case management system.
In particular, it is not possible to obtain the requested data for civil cases, given that the competent courts cannot keep records of cases in which claims have been filed for damages compensation resulting from a criminal offense, bearing in mind that claims for damages could be related to a large number of civil proceedings of a different nature.
Regarding war crimes as reported by the Higher Court in Belgrade, the War Crimes Department, in the previous period, non-pecuniary damages were not awarded because procedural conditions were not met.
However, efforts have been made by criminal courts to improve the application of the "Guidelines for the improvement of judicial practice in proceedings for compensation to victims of serious crimes in criminal proceedings."
It can be noticed within the case law that the number of cases wherein the damages claim submitted by victims (injured party) had been adopted in the course of criminal proceedings, in particularly concerning severe criminal offenses like human beings trafficking.

- Please elaborate on the establishment of a ministerial fund to help finance CSOs which will form part of the victims' support network.

Ministry of Justice

The Ministry of Justice is monitoring and analysing the work of the victims support services currently established within some higher courts in the Republic of Serbia, as well as the work of certain CSOs acting in areas of providing support to victims of various crimes. On the basis of these findings and taking into account the scope of those who contacted the CSO's acting in this area, the future framework will be developed. The concrete steps regarding this issue are to be precisely planned within the new strategic framework on the rights of victims and witnesses of crime in the Republic of Serbia.

- Please provide an update on the establishment of specialised units for free legal aid in local self-governments.

Ministry of Justice

According to the provisions of Article 22 of the Law on Free Legal Aid, administrative bodies (local self-government units and city municipalities) and providers are obliged to submit a Regular Annual Report to the Ministry of Justice by 31 January of the current year for the previous year.

Data collection and statistical processing are currently underway for the reporting period from 1 January to 31 December 2025. At the same time, the Law stipulates that the Ministry of Justice shall publish on its website a Regular Annual Report on the supervision of the implementation of this Law by 31 March of the current year for the previous year, in accordance with the provisions of Article 53, paragraph 5 of the Law.

By processing and analysing the reports submitted by local self-government units and city municipalities for 2024, it was determined that the number of registered free legal aid providers is 202.

It is important to note that this number is not a fixed category, but is subject to changes due to fluctuations, which include the registration of new providers, the termination of existing ones or changes in the status of providers. Thus, by reviewing the Register of Free Legal Aid Providers on January 9, 2026, it was determined that the number of registered free legal aid providers before local governments/city municipalities is 242.

The majority of local government units acted in accordance with the Law on Free Legal Aid and the opinion of the Ministry of Justice No. 740-10-00779/2021-37 of July 7, 2021 and established free legal aid services, either as separate organizational units or within other larger organizational units through the systematization of jobs provided for in the Regulation on the Systematization of Jobs.

- Please provide updated statistics on the provision of free legal aid in 2024, including number of requests and number of available providers.

Ministry of Justice

During 2024, the total number of applications submitted for the approval of free legal aid was 6769, out of which 6485 applications were approved. The majority of users were provided with free legal aid by persons acting as providers on behalf of the local self-government unit and the city municipality, while 1127 users were referred to lawyers. The data indicate that over 95.8% of applications were approved.

Statistics of Applications Submitted for the Approval of Free Legal Aid

Year	Number of Applications Submitted for the Approval of Free Legal Aid	Number of Accepted Applications for the Approval of Free Legal Aid	Number of users referred to a lawyer
2020.	6883	5367	954
2021.	4601	4345	602
2022.	4944	4805	576
2023.	6508	6321	932
2024.	6769	6485	1127

The Register of Free Legal Aid Providers, which keeps separate records of free legal aid providers and free legal support providers, lists a total of:

- 242 free legal aid providers in local self-government units and city municipalities;

- 1 joint service for providing free legal aid;

- 4536 free legal aid providers from the rank of lawyers;

- 25 associations are registered for providing free legal aid, while 35 associations are registered for providing free legal support;

- 38 dispute resolution mediators are registered as providers of free legal support;

- 14 public notaries registered as providers of free legal aid;

- 3 law faculties registered as providers of free legal aid.

- Please inform on measures taken so far, and measures planned for 2026, on addressing the recomendations in YUCOM's evaluation of the implementation of the Law on Free Legal Aid under the IPA project "Flexible Facility for Chapter 23". In this context, please clarify possible plans, including timeline, for amending the law on free legal aid.

Ministry of Justice

In accordance with its authorities, the Ministry of Justice regularly monitors the implementation of the current Law on Free Legal Aid. The future amendments of the Law will depend also on the amendments of the other laws, including the Civil Procedure Code. The Ministry of Justice has already started with a number of normative interventions, including those related to the criminal legislation, and the concrete steps for amendments of the Law on Free Legal Aid are to be detected once those amendments to other laws are adopted.

3.6. Freedom of expression and media freedom (*work of REM and safety of journalists)*

[As questions on the media laws and REM were already sent for the preparations of the RISSP subcommittee of 4 February 2026, only a few complementary questions are added below]

- Please inform on any new measures taken since the last JLS subcommittee to address ODIHR's outstanding recommendations on media aspects of electoral campaigns.

Ministry of Information and Telecommunications

There were no amendments concerning this issue in the June 2025 amendments to the media laws. Supervision of the activities of media service providers during an election campaign falls within the competence of the Regulatory Authority for Electronic Media, in accordance with the Law on Electronic Media.

Regulatory Authority for Electronic Media

All external complaints and decisions are published on the official website www.rem.rs.

All complaints and decisions from 2023 and part of 2024 (while the previous Council was in office) were published on the relevant REM webpages. Following the expiry of the Council's mandate, REM continued the practice of publishing complaints together with the reports of the Expert department, pending the adoption of final decisions after the appointment of a new Council.

The relevant materials were available at the following links:

– https://www.rem.rs/sr/prijave/odluke-po-prijavama

– https://www.rem.rs/sr/izvestaji-i-analize/izvestaji-i-analize-o-nadzoru-pruzalaca-medijskih-usluga/izbori/izbori-2024/prijave-izbori-2024

– https://www.rem.rs/sr/izvestaji-i-analize/izvestaji-i-analize-o-nadzoru-pruzalaca-medijskih-usluga/izbori/izbori-2023/prijave-izbori-2023

After receiving the response from the European Commission regarding the translation, we will forward it to them accordingly.

- Please inform on the process of establishing a working group (composition, timeline) for drafting a new media strategy and action plan.

Ministry of Information and Telecommunications

In December 2025, the Ministry of Information and Telecommunications initiated the process of establishing a Working Group for the drafting of a new Strategy for the Development of the Public Information System and the accompanying Action Plan for the period 2026–2030. To this end, the Ministry sent official letters to relevant institutions and stakeholders in order to ensure an inclusive and transparent process, based on broad participation of competent authorities, the media sector, and civil society organisations. With the aim of preparing a high-quality strategic document, the Ministry requested, within the framework of an IPA project for which it is the beneficiary, the provision of expert and technical support for the work of the Working Group from the project implementer, the OSCE Mission to Serbia.

- Please provide statistics on investigating and prosecuting cases of attacks and threats against journalists in 2025. Please also include an overview of the number of final convictions in the last five years (from 2021 to 2025).

Supreme Public Prosecution Office

During 2025, based on submitted criminal complaints/reports, a total of 134 cases were formed in public prosecutions (6 in January, 7 in February, 10 in March, 8 in April, 7 in May, 10 in June, 23 in July, 21 in August, 9 in September, 10 in October, 9 in November and 14 in December) in connection with incidents against 140 aggrieved parties, i.e. 102 individuals performing duties of public importance in the field of information. Of the aggrieved parties, 54 were male (52.94%) and 48 female (47.06%).

Out of the total number of cases, 65 cases were formed at the Special Public Prosecution for High-Tech Crime, which is 48.51% of the total number of cases. These cases were formed in connection with incidents against 62 aggrieved parties, i.e. 45 individuals, of whom 19 were male (42.22%) and 26 female (57.78%).

In the cases formed during this year, as of 31 December 2025, the following actions were taken:

- in 3 cases, a conviction was rendered;
- in 4 cases, court proceedings based on the public prosecutor's indictment are ongoing;
- in 12 cases, criminal complaint was dismissed;

- in 18 cases, an official note was made stating that there were no grounds to initiate criminal proceedings;
- in 18 cases, investigation/evidentiary actions are ongoing;
- in 58 cases, a request for the collection of necessary information was submitted;
- in 8 cases, the allegations of the criminal complaint or the report on information collected during the pre-investigation phase are being reviewed for the purpose of making a decision;
- in 13 cases, even after measures undertaken in the pre-investigation phase, the potential perpetrator was not identified.

A first-instance or final decision was rendered in 33 cases, representing 24.63% of the total number of cases.

Based on the available data, we can conclude that a higher number of criminal complaints and reports were filed during this year compared to previous years. Namely, during 2024, public prosecution offices formed 65 cases related to incidents against journalists, which means that during this year, 106.15% more cases were formed than in previous year.

An increase was also observed in the number of cases formed due to physical attacks on journalists. Thus, in 2025, 28 complaints were filed in connection with physical attacks on journalists and media workers, whereas in 2024, 6 complaints were filed, representing an increase of 366.67%. With regard to the aforementioned 28 cases formed this year, in only 12 cases perpetrators were identified.

The number of criminal complaints and reports related to potential criminal acts committed online has decreased, given that the share of such cases in 2025 amounts to 48.51%, whereas in 2024 their share accounted for 67.69% of the total number of cases.

In addition, a decrease is noticeable in the number of cases formed in connection with incidents against female journalists, who accounted for 47.06% of the total number of aggrieved parties in 2025, while this share amounted to 54% of the total number of aggrieved parties in 2024.

More than half of the cases are in the pre-investigation phase, during which information and material evidence are being collected in order to establish the existence of a criminal act and identify the perpetrator.

When it comes to court decision, in the period between 2021 and 2025 total of 58 final convictions were rendered – 12 in 2021, 14 in 2022, 16 in 2023, 11 in 2024 and 5 during 2025. Please note that the number of convictions refers to year when they became final, not the year when the case was opened in public prosecution.

- Please inform on the status of cases: i) within the Internal Control Sector of the Ministry of the Interior, ii) with Prosecutors' Offices, investigating reported cases of excessive use of force by the police against journalists covering protests as well as reported cases of missing reactions from the police related to attacks against journalists.

Ministry of Interior

The Internal Control Sector is currently working on seven cases in which journalists are the victims, in collaboration with the relevant prosecutors' offices. Police officers from the

Internal Control Sector have responded to requests for information, collected the necessary data, and submitted reports along with supporting documents to the public prosecutors' offices. These offices will then make a decision regarding the prosecution. It's important to note that the Internal Control Sector operates according to the established methodology for conducting investigations into cases of police abuse. The actual investigation is carried out by the public prosecutor.

Supreme Public Prosecution Office

According to available data, nine cases were formed based on reports on excessive use of force by the police against journalists covering protests. In eight cases pre-investigation procedure is underway and prosecutions are gathering information and evidence in order to make a decision and in one case a decision not to conduct criminal proceedings was issued.
In relation to missing reactions from the police related to attacks against journalists, there are three formed cases which are also in pre-investigation phase.

- Please clarify the standard procedure for registering complaints of journalists in cases of attacks and threats. Namely, media associations have informed the public of cases of attacks against journalists reporting on protests when journalists were told by police officers present on site that they could not take their complaints and that journalists had to go instead to the police stations.

Ministry of Interior

When media representatives inform police officers on the scene about incidents in which they feel threatened, the officers who are securing public assemblies—while engaged in other duties aimed at protecting individuals and public spaces—will direct these media representatives to the nearest police station. There, competent police officers will receive a detailed report of the incident and take further actions to investigate the matter.

In the Republic of Serbia, journalists and all other individuals are provided with various legal protections in accordance with the applicable laws. If they are dissatisfied with the police's response to their reports, one available form of legal protection is to lodge a complaint. This is a specific, legally prescribed mechanism for overseeing police conduct.

The procedure for submitting and reviewing complaints against police officers, the Ministry of the Interior, or specific organizational units of the Ministry is outlined in the Law on Police (Official Gazette of the RS, No. 6/2016, 24/2018, and 87/2018) and the Rulebook on the Complaint Procedure within the Ministry of the Interior. The right to file a complaint is granted to any person, including journalists, who believes that their human or minority rights have been violated by the actions or inactions of police officers while performing their official duties.

A complaint should be submitted personally, through a guardian, legal representative, or authorized attorney, either in written form - analogy or digital - or orally for the record. It must include the complainant’s personal details, a detailed description of the action or omission by the police officer against whom the complaint is lodged, all facts and evidence supporting the complaint, and the complainant’s signature. A complaint should be submitted to any organizational unit of the Ministry, including the Internal Control Sector. Each organizational unit that receives a complaint is obliged to forward it without delay to the competent organizational unit of the Ministry where the officer in question is employed.

The deadline for complaining is 30 days from the date on which the act subject to complaint occurred.

Upon receipt of the complaint, the head of the organizational unit, or a person authorized by them, first determines whether the formal conditions for conducting the complaint procedure have been met - namely, whether the complaint is comprehensible, submitted within the prescribed deadline, and by an authorized person; whether the action or omission in question qualifies as a complaint-worthy act; and whether the complaint procedure may be conducted in accordance with the Rulebook in the specific case. Once the formal conditions are confirmed, the head of the organizational unit initiates the complaint review procedure, which includes hearing the respondent, the complainant, any potential witnesses, and evaluating the collected evidence.

Another legal mechanism for the protection of the rights of all citizens, including journalists, is the lodging of a complaint to the Ombudsman, an independent state authority responsible for overseeing the work of administrative authorities. In cases where police actions or omissions bear the characteristics of a criminal offense, which cannot be considered a complaint procedure under applicable legal and sublegal acts, legal protection is achieved by lodging a criminal complaint with the competent public prosecutor's office, which is obliged to conduct an effective investigation.

Supreme Public Prosecution Office

In accordance to the Criminal Procedure Code a criminal complaint is submitted to the competent public prosecutor, in writing, orally, or by other means.

If a criminal complaint was submitted to the police, they will receive the complaint and deliver it to the competent public prosecutor immediately.

Furthermore, due to signing of Agreement on cooperation and measures to raise the level of safety of journalists, contact persons in public prosecution and police were asigned for communication and coordination in reporting criminal acts and exchanging information, with the involvement of members of the Permanent Working Group in case of need.

- Media associations have informed the public of several cases in 2025 of (brief) detention of journalists reporting on protests. Please inform on the number of arrested and detained journalists during demonstrations and protests in 2025, the nature of the charges pressed against them as well as their current status.

Ministry of interior

In 2025, police officers of the City of Belgrade Police Directorate brought three journalists reporting from protests into official premises:

On 8 March 2025, Nemanja Šarović, a journalist from KTV in Zrenjanin, was brought into the official premises of the Stari Grad Police Station, who disturbed public order and peace, at the registered public assembly in Pionirski Park. A request for the initiation of misdemeanor proceedings has been submitted against him to the Misdemeanor Court in Belgrade under case number 1-101-190/25, on the grounds of a reasonable suspicion that he committed the offenses of Brazen or Reckless Behavior under Article 8 of the Law on Public Order and Peace, and Insult under Article 9 of the same Law.

On 16 August 2025, Nisi Emanuele, a citizen of the Republic of Italy, was brought intto the official premises of the New Belgrade Police Station by members of the Special Police Unit (PJP) Police Brigade from the Bulevard Zorana Đinđića. He was removed from the

area where an unregistered public assembly was taking place. During the event, he moved alongside the police cordon without displaying press credentials, recorded police actions, and refused to comply with police orders. He identified himself to police officers as a journalist of the German press agency DFJ, ID No. 30483, under the name of "Association of German Photographers and Journalists – Pressausweis." The on-duty prosecutor of the Higher Public Prosecutor's Office in Belgrade was informed of the aforementioned incident and stated that the incident did not constitute elements of a criminal offense ex officio. Furthermore, the on-duty police officers of the Counter-Terrorism Department, the Department for Foreigners, and the Security Information Agency (BIA) were also informed of the aforementioned incident and stated that there were no grounds for them to take action against the individual in question, after which Nisi Emanuele left the official premises of the New Belgrade Police Station.

•On 28 September 2025, Luka Pešić, born in 2000, who identified himself as a journalist of Independent Journalists' Association of Serbia (NUNS), was brought into the official premises of the Stari Grad Police Station from the Macedonian Street by police officers engaged in securing both registered and unregistered public assemblies. Immediately prior to being brought in, he failed to comply with police orders. An interview was conducted with the individual in question by the police officers of the Stari Grad Police Station, following the instructions of the on-duty public prosecutor of the First Basic Public Prosecutor's Office and report No. 5453/25 was submitted to the First Public Prosecutor's Office.

Supreme Public Prosecution Office

The Supreme Public Prosecution does not have any record about aforementioned.

- Please inform on the number of cases of verbal attacks against the media or civil society representatives handled by the parliament's administrative committee in the application of the code of conduct of the National Assembly in 2025 and their outcome.

National Assembly

There were no such cases.

Additional questions Rule of Law report (please only inform in case of new developments since the last JLS subcommittee and please refer explicitly to the enforcement of the media legislation as amended in 2023 and 2025):

- Measures taken to ensure the fair and transparent allocation of state advertising.

Ministry of Information and Telecommunications

State advertising represents a specific legal institute within the European Media Freedom Act (EMFA). As such, it is not defined by the current regulations of the Republic of Serbia in the field of public information and media, nor is it regulated by the Law on Public Information and Media, including its amendments from 2023 and 2025.

If the query referred to Article 47 of the Law on Public Information and Media, it is important to emphasize that this provision does not regulate state advertising. Article 47 mandates the obligation of media outlets to publish data regarding financial resources

received from public authorities, regardless of the legal basis under which the funds were allocated. This is a mechanism for financial transparency, rather than a regulation of advertising itself, its objectives, content, or distribution criteria.

The issue of state advertising is, by its nature, part of the broader field of advertising as a market activity. For this reason, the inquiry has been directed to the competent institutions in that field, with the expectation that they may provide views on possible regulatory approaches. Such an approach stems from a functional division of jurisdiction, rather than from media legislation.

In conclusion, state advertising is a multi-departmental issue encompassing media law, advertising, market competition, and public spending. As such, it will be addressed and considered within the process of harmonization with the EMFA, including decisions regarding the competent authority and the appropriate institutional framework.

- Safeguards against state / political interference, in particular:

  - safeguards to ensure editorial independence of media (private and public). Please notably inform on the enforcement of the new provisions on this matter introduced in the amendments to the Law on public information and media in October 2023 and June 2025.

Ministry of Information and Telecommunications

The Law on Public Information and Media regulates all media in Serbia and includes specific provisions aimed at protecting media pluralism and editorial independence. The most recent amendments to the Law in 2025 introduced additional safeguards, in particular through the newly added Article 39a. This article strengthens the requirements for editorial independence of media outlets whose publishers are directly or indirectly established by public authorities, in accordance with the Law. Such publishers are required to adopt internal ethical codes, ensure that editorial offices operate independently from their founders, and appoint members of their governing bodies exclusively from among experts with professional competence in the fields of media, law, culture, or finance. Furthermore, the same article prohibits individuals who hold public office or positions within political parties from performing management functions in such publishing entities for a period of two years following the expiry of their public mandate.

  - specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal), safeguards for their financial and operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions.

Ministry of Information and Telecommunications

The Programme Council consists of 11 members selected from among experts in the fields of media, culture, education, artists and creators in the field of the arts, scientists, and representatives of associations whose objectives include the protection of human rights and democracy. The members of the RTS Programme Council are elected by the committee of the National Assembly competent for the field of public information. The members of the RTV

Programme Council are elected by the committee of the Assembly of the Autonomous Province of Vojvodina, competent for the field of public information.

- information on specific legal provisions and procedures applying to media service providers, including as regards granting/renewal/termination of licences, company operation, capital entry requirements, concentration, and corporate governance.

Ministry of Information and Telecommunications

The implementation of these provisions falls within the competence of the Regulatory Authority for Electronic Media.

- Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners. Please notably inform on the enforcement of the new provisions on this matter introduced in the amendments to the Law on public information and media in October 2023: have legal provisions on supervisory inspections of the media register started being implemented?

Ministry of Information and Telecommunications

Sanctions are provided for cases where public authorities and other competent entities fail to fulfil their obligations to report information on public funding to the Media Register.

Public authorities and other entities are required to submit complete and accurate information on all sources of public financing of media. Failure to submit such information, or submission of incomplete information, is subject to sanctions in accordance with the Law on Public Information and Media.

Information on funds referred to in Article 47, paragraph 1, points 9) and 10), and paragraph 2, point 3), shall be reported to the Media Register, or recorded in the Records, no later than 15 days from the date of the decision on the allocation of funds, or shall be retrieved from the Unified Information System as of the date of its establishment.

If this obligation is not complied with, the responsible person within a public authority shall be fined between RSD 50,000 and RSD 150,000 for a misdemeanour if they fail to submit the information on the allocation of funds to the Media Register within the prescribed 15-day period.

- Rules and practices guaranteeing journalist's independence and safety, including as regards protection of journalistic sources and communications, referring also, if applicable, to follow-up given to alerts lodged with the Council of Europe's Platform to promote the protection of journalism and safety of journalists.

Ministry of Information and Telecommunications

The most recent amendments to the Law on Public Service Media, adopted in June 2025, introduced a new provision in Chapter II – Public Interest Fulfilled by Public Service Media, which establishes an obligation for public service media to contribute to the enhancement of

the safety and protection of journalists and media professionals (Article 7, paragraph 1, item 20). In addition, the Ministry of Information and Telecommunications supports projects focused on journalist safety and freedom of expression through the project co-financing mechanism. In 2025, a total of three projects addressing freedom of expression and the safety of journalists were supported, in the total amount of RSD 2,635,000.00, as follows:

- "Enhancing Systems and Mechanisms for Prevention and Response in Cases of Threats to the Safety and Lives of Journalists in Serbia" (Business Association ANEM, Belgrade), which strengthens the protection of journalists at the local level, with a particular focus on women journalists, and provides continuous monitoring of threats directed at media professionals.
- "Media in Kosovo and Metohija: Working on the Front Line" (SERBONA KM Association), which addresses the long-term risks faced by journalists in Kosovo and Metohija, including physical threats and intimidation, and formulates recommendations for their protection.
- "Religious Media and Media Risks Arising from the Legal Rights of Citizens" (Šumadija Diocese of the Serbian Orthodox Church, Kragujevac), which promotes dialogue among Orthodox, Roman Catholic, Islamic, and Jewish media on challenges related to freedom of expression, privacy protection, and citizens' rights.

Since autumn 2024, an IPA III project, programmed by the Ministry of Information and Telecommunications and implemented by the OSCE Mission to Serbia, has included a dedicated component focused on supporting the Permanent Working Group for the Safety of Journalists. Through this component, a range of practical measures has been implemented, including: annual workshops and regional consultations for media professionals on labour and professional rights; targeted training for prosecutors, police officers, members of the judiciary, lawyers, and media professionals on journalist safety; continuous support to the 24/7 SOS hotline; analysis of legislation on the protection of sources in the digital environment; and international study visits for the Permanent Working Group. Within the framework of the project, key activities related to journalist safety were carried out in 2025. During the year, training was organised for 54 participants, including prosecutors, police officers, and media representatives, with a focus on institutional responsibilities, procedures in cases of threats, and the protection of journalists during public gatherings. In parallel, the operation of a 24/7 SOS hotline for journalists at risk was supported for the period August 2025 - June 2027, providing urgent legal and procedural assistance and strengthening cooperation between competent institutions and media associations. During September and October 2025, a total of 51 communications were recorded through the SOS hotline, indicating active use of the mechanism and its importance for the practical protection of journalist safety. The first study visit for the Permanent Working Group was organised in early autumn, during which ten representatives of the Group visited French institutions, including the Ministry of the Interior, the Ministry of Culture, the Paris Court of Appeal, and the Public Prosecutor's Office, as well as Reporters Without Borders, the National Union of Journalists (SNJ-CGT), the investigative outlet Mediapart, the French Observatory for Attacks on Media Freedom, the Council for Ethics and Mediation in Journalism, and UNESCO.

- Access to information and public documents by public at large and journalists (including

transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information). What may be the causes that explain that, according to the 2024 Report of the Commissioner for Information of Public Importance, report, the percentage of unexecuted Commissioner's decisions on complaints by journalists is higher than for other complainants (31.94% of their requests go unanswered)? Could you please inform on which ministries and public bodies have the highest percentage of "administrative silence" (not responding to journalists' request for information) or refusal to disclose information?

Commissioner for Information of Public Importance and Personal Data Protection

Throughout 2025, the same trends in terms of journalistic complaints continued, as shown in the 2024 report. In 2025, a total of 166 complaints were filed by journalists, of which 73 complaints were filed against the silence of the administration, or 43.97%. Complaints about silence were most often filed against ministries, judicial bodies, and local government bodies. Among ministries, the most complaints about silence on journalistic requests were filed against the Ministry of Internal Affairs (6), and when it comes to local government bodies, the most complaints were filed against the City Administration of the City of Belgrade (5). Among other types of bodies, there are none that stand out in terms of the number of complaints about silence.

During 2025, 195 complaints from journalists were resolved (complaints from the previous period were also resolved). Complaints from journalists represent a special priority in the work of the Commissioner, despite numerous abuses of rights by certain unscrupulous lawyers, which significantly complicate the work of the Commissioner, because journalists report on extremely important topics for the entire public.

Out of a total of 195 resolved complaints from journalists, in 44 cases the provision of information was ordered. In the period from 1.1.2025. to 30.11.2025. (data available to the Commissioner at the time of writing this report), the Commissioner issued 44 decisions ordering the provision of information in journalist complaints. In 44 decisions, 1 complaint was merged during the resolution, so that 43 decisions on the order were issued. Out of 43 decisions, by 9.1.2026, 20 unenforced decisions were recorded, which means that the percentage of enforcement is currently 53.5%, i.e., 46.5% of decisions issued on journalist complaints were unenforced.

Possible reasons for the higher percentage of unenforced decisions on journalistic complaints are primarily the lack of adequate accountability of high-ranking public officials and heads of bodies for unenforced decisions of the Commissioner, but also a lack of understanding of the importance and role of journalists in a democratic society, and a general lack of understanding of the importance of transparency for the development of a society.

- Could you please inform about lawsuits (including SLAPPs - strategic lawsuits against public participation) and convictions against journalists (including defamation cases) as well as measures taken to safeguard against manifestly unfounded and abusive lawsuits?

Supreme Court

The notion of "slapp lawsuits" has not been envisaged in the legislation of the Republic of Serbia. However, we are aware of the new Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation'). This issue has been presented and discussed at round tables on several occasions (in cooperation with OSCE) concerning media freedom with participation of judiciary and journalists. Moreover, the issue of slapp lawsuits has been discussed at round table organized in cooperation of the EJTN and Judicial Academy during the session Media Freedom from the perspective of the EU Charter of Fundamental Rights (held on 27-28 February 2025).

Herein, we present several examples from the case law of courts wherein the protection before the court has been obtained, relying on the provisions of the Law on Public Information and Media and other applicable legislation including provisions of the European Convention of Human Rights. With this regard we indicate to several examples from the case law of the Civil Department of the Higher Court in Belgrade and Appellate Court in Belgrade, in which the plaintiffs' claims for the protection of the individual rights were dismissed.

It should be noted that presented examples of judgments became final in 2025 (confirmed by the Appellate Court during 2025, meaning that the first-instance judgments might be rendered earlier), in which journalists, media outlets, or online portals were granted judicial protection in accordance with the applicable legal framework.

Example 1

The applicant, D. H., is a former State Secretary at the Ministry of the Interior. The defendants are the Crime and Corruption Reporting Network (KRIK), the publisher of a public online news portal, and S. D., the editor-in-chief of that portal.

The applicant sought an order requiring the defendants, jointly and severally, to pay compensation in the amount of RSD 705,360 in respect of non-pecuniary damage for the mental distress allegedly suffered as a result of the infringement of her honour and reputation, as well as the presumption of innocence, together with statutory interest accruing from 18 December 2024. She also claimed reimbursement of the costs of the proceedings.

By a judgment of 24 December 2024 (P3 311/22), the High Court in Belgrade dismissed the applicant's claim. That judgment was upheld by the Appellate Court on 26 March 2025 (Gž3 111/25). The applicant was ordered to reimburse the defendants' costs of the proceedings.

In its reasoning, the Higher Court relied on Article 46 of the Constitution, which guarantees freedom of opinion and expression. It further referred to Article 18 § 3 of the Constitution, which provides that provisions concerning human and minority rights are to be interpreted in a manner conducive to the advancement of the values of a democratic society, in accordance with applicable international human rights standards and the practice of international bodies responsible for supervising their implementation.

The court also relied on Article 14 of the Law on Public Information and Media, which requires that the provisions of that Law be interpreted and applied in line with generally recognised rules of international law, relevant international human rights standards, and the practice of international supervisory institutions.

Furthermore, the first-instance court noted that, in deciding the present case, it had taken into account the standards and case-law developed under the European Convention on Human Rights, in particular Articles 8 and 10 of the Convention, as interpreted by the European Court of Human Rights.

Lastly, the first-instance court had regard, inter alia, to the relevant provisions of the Law on Public Information and Media ("Official Gazette of the Republic of Serbia", nos. 83/2014, 58/2015 and 12/2016), as applicable at the material time, namely when the impugned articles were published:

- Article 9 § , which provides that an editor and a journalist are required, prior to publishing information containing data concerning a specific phenomenon, event or person, to verify its origin, accuracy and completeness with due diligence appropriate to the circumstance
- Article 48 §§ 1 and 2, concerning the liability of the editor-in-chief;
- Article 73, which stipulates that, for the purpose of protecting human dignity, as well as the independence, reputation and impartiality of the courts or other competent authorities, no one may be designated in the media as the perpetrator of a criminal offence, or declared guilty or responsible, prior to the final determination of a court decision;
- Article 79 §§ 1 and 2, which provide for the protection of personal dignity (honour, reputation and respect) of the person to whom the information relates, and stipulate that the publication of information infringing honour, reputation or respect, or presenting a person in a false light by attributing characteristics or qualities which that person does not possess, or by denying characteristics or qualities which that person does possess, shall not be permitted where the interest in publishing the information does not outweigh the interest in protecting dignity and the right to authenticity, in particular where such publication does not contribute to a public debate on the phenomenon, event or person concerned;
- Article 101, which provides that when the publication of information or records infringes the presumption of innocence, the prohibition of hate speech, the rights and interests of minors, the prohibition of public dissemination of pornographic content, the right to personal dignity, the right to authenticity, or the right to privacy, in accordance with the provisions of this Law, an action may be brought seeking: (i) a declaration that the publication of the information or record has violated a right or interest; and (ii) a prohibition of the repeated publication of the information or record.

From the reasoning of the judgment of the High Court in Belgrade:

The court took into account that the plaintiff (claimant) had held the position of State Secretary, a high-ranking public office, and was therefore required to display a higher degree of tolerance towards information and criticism concerning her, as well as a higher degree of tolerance regarding the public's legitimate interest in being informed about her conduct.

The court found that, in the present case, the duty of journalistic diligence had not been breached. It held that the defendants had verified the relevant information with due diligence appropriate to the circumstances of the case, and that, prior to publishing the articles, they had

attempted, by various means, to contact the claimant, including by calling her directly and indirectly through her legal representatives. The court further noted that the claimant had refused to engage with them and had not requested the publication of a correction or reply.

The court further found that, in the circumstances of the case, the claimant's presumption of innocence had not been violated, as the impugned articles had not designated her as the perpetrator of a criminal offence…. Rather, the articles contained a critical assessment directed at the work of the prosecution and merely informed the public of the criminal charges brought against the claimant and their nature. The claimant had not been portrayed as guilty; instead, the public was informed of the content of judicial case files, accompanied by the journalists' critical commentary. Such reporting is protected by the Constitution and by the European Convention on Human Rights.

The judgment sets out in detail the content of the impugned articles, on the basis of which the court concluded that the present case concerned investigative journalism. The purpose of the articles was not to cause negative consequences for the claimant. On the contrary, the overall course of the proceedings demonstrated that the journalists pursued a legitimate aim and addressed matters of public interest, that they did not exceed the scope of the information obtained, and that reasonable efforts were made to verify the relevant facts.

Lastly, the court held that the interest in publishing the impugned information outweighed the claimant's interest in protecting her personal dignity, honour and reputation, and that the publication contributed to a public debate concerning the person to whom the information related. The court reiterated that freedom of expression is not absolute and that a fair balance must be struck between the general interest of society and the interests of the individual. In the present case, it found that the general interest justified the publication of the impugned statements, bearing in mind that the claimant had held the position of State Secretary and was therefore required to tolerate a higher level of criticism, particularly in the context of the existence of criminal charges for the offence of trading in influence.

The ruling of the Higher Court in Belgrade was upheld by the Appellate Court in its judgment Gž 111/25, which stated, inter alia, that the media have not been required to establish the truth with the same degree of certainty as courts or other State authorities. The Appellate Court further emphasised that the headlines and the content of the articles must be examined in their overall context, taken as a whole, bearing in mind that they were based on statements contained in the indictment proposal submitted by the Prosecutor's Office for Organised Crime, given that criminal proceedings had been instituted against the claimant during the relevant period…

Example 2

The claimants were private individuals I. B. and S. V., co-owners of the company Milenium Team. The defendants were United Media Digital and M. J., the editor-in-chief of the media outlet "nova.rs".

By their claim, the claimants sought compensation for non-pecuniary damage in the amount of RSD 12,000 each, as well as the removal of the impugned article from the "nova.rs" website. The claim was dismissed in its entirety, and the claimants were ordered to reimburse the defendants for the costs of the civil proceedings.

The claimants argued that the defendants had published an article on the "nova.rs" website entitled "*Jeremić: We have declared war on corruption; the target is 'Milenium Team'*", along with other statements which, in their view, had damaged the claimants' reputation.

Similarly to the previous example, the court relied on the provisions of the Law on Public Information and Media, Article 10 of the European Convention on Human Rights, and the relevant case-law of the European Court of Human Rights.

Acting as the first-instance court, the Higher Court observed, inter alia, that the protection of freedom of expression also entails a *certain degree of provocation, including expression that may offend, shock or disturb. It found that the defendants had not acted with the intention of disrespecting the claimants, nor had they endorsed the statements transmitted, bearing in mind that the allegations made by V. J, a political party official who had voiced the impugned claims, were presented within quotation marks and highlighted in bold letters, clearly indicating that they constituted a third party's statement*.

Relying extensively on the case-law of the European Court of Human Rights, the court assessed that the claimants were required to demonstrate a higher degree of tolerance, given the public's legitimate interest in being informed about the business activities of the company Milenium Team. It further found that the defendants had acted in full compliance with the duty of journalistic diligence. This assessment was upheld by the Appellate Court, which stated as follows:

In the present case, the subject matter of the impugned journalistic articles consisted of a statement issued by the People's Party, namely a statement made by one of its officials at a press conference, addressing issues of corruption, misuse of public funds and the acquisition of State-owned property. The focus of the reporting was on conveying third-party statements concerning the business operations of Milenium Team and highlighting the business links between that company and holders of public office. These matters are of public interest, as the public has a legitimate interest in being informed about such developments, which also contributes to public debate within society.

In addition to the fact that the impugned information concerned individuals, phenomena and events of public interest, the claimants, through their conduct in their professional activities, contrary to their submissions on appeal, had attracted public attention and thereby given rise to the publication of information relating to changes in the ownership structure of former socially owned enterprises, the purchase and lease of State-owned land, and participation in large-scale construction projects… The claimants are public figures, as they are co-owners of a company that became the owner of certain formerly socially owned enterprises and participated in the implementation of State projects. As such, they must tolerate a higher degree of public scrutiny than private individuals.

As regards the duty of journalistic diligence, the Appellate Court, like the first-instance court, noted that the *impugned article was published under a specific headline on the "nova.rs" online portal and constituted reproduced information, namely a faithfully transmitted press release issued by a political party or its officials at a press conference. The defendants had conveyed the statement accurately and in full, without alterations or the expression of the author's personal views.*

The courts further found that the *defendants had not exceeded the scope of the information obtained, nor had they engaged in arbitrary elaboration of the text unsupported by evidence. The article did not contain any value judgments amounting to unlawful incrimination. The verification of the accuracy of information requires diligence appropriate to the circumstances of the specific case, and whether sufficient care has been exercised must be assessed in the context of reasonable measures and means available to the journalist. In the present case, the court found that the information had been reported exactly as it had been stated.*

Example 3

The claimants were I. B. and S. V., co-owners of the company "Milenium Team". The defendants were "Direktno Digital News" and I. V. and M. Z., respectively the editor-in-chief and a journalist of the News section of the said online portal.

By their claim, the claimants sought compensation for non-pecuniary damage for the alleged violation of their honour and reputation arising from information published on the "direktno.rs" website in an article entitled "Belgrade Tycoon Buys Leskovac Plantations", as well as the removal of the impugned article.

Acting as the first-instance court, the Higher Court in Belgrade dismissed the claim by its judgment of 28 January 2025 (P3 no. 200/21). That judgment was upheld by the Appellate Court on 12 June 2025 (Gž 227/25).

Having examined all the circumstances of the case, including the claimants' argument that their reputation had been harmed by the use of the term "tycoon", as well as the impugned article taken as a whole, the court concluded that the context in which that term had been used amounted to a value judgment. Taking into account the business activities of the company concerned, which had been involved in some of the most significant projects in the Republic of Serbia, and noting that the claimants had not contested the accuracy of the factual information contained in the impugned article—namely, that the company had participated in a gasification projects in Smederevo and Grocka, had acquired the "Goša" Institute, and that one of its subsidiaries was engaged in tractor manufacturing—the court found that there had been a sufficient factual basis for the value judgment expressed and for the critical opinion voiced by the defendants. It held that the article constituted legitimate criticism of the claimants' economic influence as individuals and of their business activities.

The court further considered that there existed a public interest in being informed about these matters, as the published article concerned issues relating to the spending of public funds, the financing of State projects, and their proper implementation.

Relying on the case-law of the European Court of Human Rights, the Higher Court dismissed the claim for compensation for damage to honour and reputation, finding that the reporting concerned matters of public interest, that the factual information was accurate, and that the value judgments, which are not susceptible of proof, were based on a sufficient factual foundation.

The claimants were ordered to reimburse the defendants for the costs of the proceedings in the amount of RSD 262,430.

Example 4

The claimant was “Ipsos Strategic Marketing”, a company engaged in market and media research, while the defendant was the online portal “Direktno.rs”. The claimant alleged that its reputation had been damaged as a result of a critical article published by the defendant concerning the manner in which the claimant had conducted a particular survey.

Acting as the first-instance court, the Higher Court in Belgrade dismissed the claim by its judgment of 31 January 2024. That judgment was upheld by the Appellate Court in its judgment Gž 213/24.

The subject matter of the impugned article concerned a public opinion poll relating to the elections forthcoming at the material time, conducted by the claimant in its capacity as a commercial entity specialising in market research and public opinion polling. The Appellate Court endorsed the assessment of the first-instance court that the headline of the impugned article – “Fake IPSOS Survey” – constituted a value judgment.

The Appellate Court held that, when this value judgment was weighed against the importance of the subject matter, it was evident that the general public interest in being informed about potential irregularities outweighed the claimant’s interest in protecting its business reputation. Although it could be accepted that the headline employed the term “fake”, which is objectively capable of harming reputation, the court found that it constituted linguistic hyperbole commonly used in media reporting in order to attract public attention.

Accordingly, in the court’s view, neither the content of the headline nor the impugned article taken as a whole could be regarded as an allegation of a systemic or established practice on the part of the claimant. Rather, they were to be understood as a critical assessment of a specific polling methodology and as the author’s value judgment expressed in the context of a public debate on the manner in which opinion polls are conducted.

Example 5

In case P3 197/25 of 24 June 2025 (upheld by judgment of the Appellate Court of 6 November 2025) the claim of the plaintiff maloletnih D.S. and L.SA.S against Association “Eutopija” and V.R (editor of the internet portal “Pištaljka”) was dismissed and the plaintiffs were obliged to pay the costs of the proceedings to respondent party.

The plaintiffs claim that the respondent and the responsible editor of the media outlet “Pištaljka” published an article on December 30, 2021 under the title “Minor sons of official of the Serbian Progressive Party A.S. became owners of state land”. Further, they claim that on that occasion they also provided false information that violated the rights and interests of the minor plaintiffs. They specifically alleged that with that article they violated the interests of the minor plaintiffs and harmed their moral, intellectual, emotional and social development…They further stated that the respondent did not act in accordance with appropriate journalistic diligence since they did not verify specific information.

The Higher Court, having analysed all the circumstances of the case, concluded that respondent acted in accordance with appropriate diligence within the meaning of Article 9 of the Law on Public Information and the Media. In the specific case, regarding the age of the minor plaintiffs, the court considered that, given the language used in the article, it is *prima facie* clear to the average reader that children cannot undertake such actions (like purchasing land…). It is clear that these actions must have been undertaken by an adult, and it is concluded that the

defendant’s intention was not to target the children of A. S. The main topic of the article is the legal representative of the plaintiffs (A.S.) as well as the facts that the previously leased state land, later became the property of companies, including those owned by the minor sons of A.S. The court also took into account that the defendant did not question the legality of the acquisition of the shares of the minor plaintiffs... and, therefore, the defendant's intention was not to discredit the minor plaintiffs. The court concludes that the disputed text does not create the impression among readers that the plaintiff's children undertook any actions related to the disposal of large amounts of money.

The Higher Court did not find that the information in question could have led to a violation of the rights or interests of the plaintiffs, so taking into account all of the above, the claim was dismissed including the part of the claim for the deletion of certain parts of the published information.

The Appellate Court upheld the ruling of the Higher Court having found that the provisions of the Law on Public Information and Media (art. 5,8,77,84,96,97,98 and 100) were dully applied.

3.7. Freedom of assembly

- Please provide updated information on how the police is following up on previous recommendations of the Ombudsman on the conduct of police officers in protests.

Ministry of Interior

In 2025, police officers acted against several persons during protests, who were arrested and placed in detention:

1. Six persons were arrested and ordered to be detained for up to 48 hours due to the existence of grounds for suspicion that they committed the criminal offense of Preparation of an act against the constitutional order and security of the Republic of Serbia under Art. 320, paragraph 1 of the Criminal Code, and in connection with the criminal offense of Attack on the constitutional order under Art. 308 of the Criminal Code and the criminal offense of invoking a violent change in the constitutional order.
2. Fifteen (15) persons were arrested and ordered to be detained for up to 48 hours due to the existence of grounds for suspicion that they committed the criminal offense of invoking a violent change in the constitutional order under Art. 309 of the Criminal Code, and in connection with the criminal offense of Association for the purpose of committing criminal offenses under Art. 346 of the Criminal Code.
3. Two persons were arrested and ordered to be detained for up to 48 hours due to the existence of grounds for suspicion that they committed the criminal offense of Preparation of an act against the constitutional order and security of Serbia under Article 320 of the Criminal Code and Attack on the constitutional order under Article 308 of the Criminal Code.
4. One person was arrested and ordered to be detained for up to 48 hours due to the existence of grounds for suspicion that he committed the criminal offense of Invoking a violent change in the constitutional order under Article 309, paragraph 1 of the Criminal Code.

Ombudsman

The Protector of Citizens has, through individual cases, monitoring activities and special reports, issued recommendations to the Ministry of Interior concerning the conduct of police officers during public assemblies and protests, with a particular focus on the lawful use of police powers, proportionality in the use of force, identification of police officers, protection of participants' rights and effective accountability mechanisms.
The Ministry of Interior regularly provides information to the Protector of Citizens on measures taken following these recommendations. Reported follow-up actions by the police have included internal reviews of police conduct in specific incidents, the initiation or conduct of internal control procedures, and the application of disciplinary measures where irregularities were established. In addition, the police have reported the implementation of preventive measures, including internal instructions, training activities and awareness-raising aimed at reinforcing standards related to the policing of public assemblies.
The implementation of recommendations is monitored through the Protector of Citizens' established follow-up mechanism. Upon expiry of the deadline set for implementation, the Ministry of Interior is requested to submit detailed information and supporting documentation on the measures taken. The Protector of Citizens assesses the submitted information and categorises recommendations as implemented, partially implemented or not implemented. Where the information provided is incomplete or where implementation remains pending, additional clarification is requested and follow-up continues until the recommendation is fully addressed or further action is deemed necessary.
Findings related to police conduct during protests, including the level of implementation of recommendations, are reflected in the annual reports of the Protector of Citizens and, where relevant, in special reports. These reports are made public and serve as a basis for continued dialogue with the Ministry of Interior, as well as for informing parliamentary oversight and international monitoring processes.

- Please provide information on the number of arrested and detained persons during demonstrations and protests in 2025, the nature of the charges pressed against them as well as their current status (how many released, how many guilty pleas, how many convictions and how many pending cases).

Ministry of Interior

In the Republic of Serbia, following the canopy collapse in Novi Sad, from November 1, 2024, to December 31, 2025, there were significant legal actions taken during public gatherings.
A total of 3,012 individuals were prosecuted, including 583 for criminal offenses and 2,429 for misdemeanors. Additionally, 962 reports were submitted to the competent prosecutor's offices concerning 885 individuals. During this period, 1,411 people were apprehended, consisting of 426 for criminal offenses and 985 for misdemeanors.
Detention measures were applied to 574 individuals, with 328 related to criminal offenses and 246 to misdemeanors. In total, 596 criminal charges were filed against 583 individuals for 632 criminal offenses. Furthermore, 2,045 misdemeanor charges were filed against 2,429 individuals for 3,219 committed misdemeanors. Please note that due to the

methodology used by the Analytics Department, we are unable to provide data specifically for the year 2025.

Supreme Public Prosecution Office

During 2025, according to the data received from the public prosecution offices, criminal complaints were submitted against 425 persons in relation to various demonstrations and protests.
Based on the received criminal complaints, the following actions have been taken:

- 25 persons court adjudicated guilty
- 3 persons court aquitted
- Indictments have been filed against 97 persons, out of which 27 persons have concluded a plea agreement
- Investigation or evidentiary actions were being undertaken against 336 persons
- Decisions to dismiss the criminal complaint have been made regarding 52 persons
- Preinvesigation is underway regarding 1 person

The largest number of criminal complaints were filed in relation to criminal offences Violent Behaviour during Sports Event or Public Gathering under Article 344a of the CC (171 persons) and Attack on an Official in Performance of Duty under Article 323 of the CC (135 persons).
Pursuant to the Article 294 of the Criminal Procedure Code (CPC), 246 persons were kept in custody. Out of that number, against 113 persons measures have been ordered by the competent courts to ensure their presence and unhindered conduct of the criminal proceedings:

- Detention measure under Article 211 of the CPC – imposed on a total of 76 persons
- Prohibition of leaving a dwelling under Article 208 of the CPC or Prohibition of Approaching, Meeting or Communicating with a Certain Person under Article 197 of the CPC – imposed on 37 persons;

- Please inform on the status of cases: i) within the Internal Control Sector of the Ministry of the Interior, ii) with Prosecutors' Offices, investigating reported cases of excessive use of force by the police against participants in protests.

Ministry of Interior

The Internal Control Sector received a total of seventy-two (72) requests for information collection from the relevant prosecutor's offices. Of these requests, the Internal Control Sector successfully completed the proceedings for 66, while 6 requests are still pending.

- Please inform on the status of all reported cases of violence against participants at the protests. Please also provide an overview of the cases of presidential pardon and inform on their legal basis and reasoning.

Ministry of Justice

The legal basis for initiating a pardon procedure is contained in Article 4 of the Law on Pardon ("Official Gazette of the RS" Nos. 49/95 and 50/95–correction), paragraphs 1 and 2, which provide that a pardon procedure is initiated either upon request or ex officio, and that a pardon procedure granting exemption from criminal prosecution is initiated only ex officio. Furthermore, Article 11 of the same law regulates in more detail that a pardon procedure initiated ex officio is undertaken by the Minister of Justice, and that when the Minister of Justice initiates a pardon procedure ex officio, the provisions of this law on pardon procedures initiated upon request apply accordingly. This means that the necessary information is obtained from courts and penal institutions if the person is serving a sentence. The Ministry of Justice may also request from other government authorities the data necessary for a decision upon request.

Supreme Public Prosecution Office

During 2025, criminal complaints were submitted against 85 persons in relation to violence against participants of protests and demonstration.

Based on the received criminal complaints, the following actions have been taken:

- 8 persons court adjudicated guilty
- Indictments have been filed against 19 persons, out of which 3 persons have concluded a plea agreement
- Investigation or evidentiary actions were being undertaken against 16 persons
- Decisions to dismiss the criminal complaint have been made regarding 8 persons
- Preinvesigation is underway regarding 33 person

Furthermore, the First Basic Public Prosecution in Belgrade formed 32 cases related to potential violent events against participants at the protests and in all of these cases pre-invastigation procedure is underway and prosecutions are gathering information and evidence in order to make a decision.

- Please provide an update, including in terms of domestic proceedings, on the follow-up to the interim measure of the European Court of Human Rights of 29 April 2025 regarding the alleged use of a sonic weapon in Belgrade on 15 March 2025. Please also inform on any actions taken by the Ombudsman on this matter.

Ministry of Interior

At the citizens' gathering held on March 15, 2025, the police did not deploy a sound cannon. Pursurant to the Law on Police, the so-called "sound cannon" is not prescribed as a means of coercion, nor in any other form, so there no legal basis for its use.
All members of the Ministry of Interior, General Police Directorate, who were engaged in securing the public gathering on March 15, 2025, provided statements regarding the information related to the alleged use of a means, more precisely a weapon or a pyrotechnic device, the so-called "sound cannon" which could have posed a threat to the life or body of all citizens present at the aforementioned gathering where it was stated that no organizational unit

Furthermore, regarding the protection measures, it is necessary to point out that they can be found, as publicly available information, i.e., on the website of the device manufacturer.

Ombudsman

On 17 March 2025 the Protector of Citizens initiated the investigation procedure based on complaints received from citizens, as well as information from the media, that on 15 March 2025 during a protest in Belgrade on Kralja Milana Street, a "sound cannon" had been used as an illegal instrument of force. The Protector of Citizens requested the Ministry of Internal Affairs and the Ministry of Defense to provide him with all information regarding this topic. The Protector of Citizens also requested the Higher Public Prosecutor's Office in Belgrade to provide all relevant data and evidence regarding this case. The UKCS Emergency Center in Belgrade was also requested to provide all available expert and reliable information that would help determine the factual situation regarding the use of agents whose effects could affect human health.
In addition, the Protector of Citizens requested that the NGOs "Belgrade Center for Human Rights", "Crta" and "A11" provide him with information at their disposal, pertaining to the testimonies and data obtained from citizens after the protests, and called on all citizens who have credible information regarding the event under investigation to contact the institution and provide their information.

3.8. Prevention of torture and ill-treatment *(recommendations of the UN Committee Against Torture (CAT) on Serbia's third regular report and of the 2022 CPT report on Serbia, work of the National Preventive Mechanism),* prison conditions and alternative sanctions

- Please provide up-to-date information on how Serbia addressed:

→ recommendations in the last CPT periodic report of March 2022 (the published government response dates from March 2022);
→recommendations after the CPT ad hoc visit of March 2023 (the published government response dates from January 2024).
Considering the link with the IBMs and the need for the Commission to receive structured feedback in view of the future IBAR, please find here below a suggested template to follow up on Council of Europe bodies' recommendations, as also discussed in the Chapter 23 interim benchmarks VTC on 17/10/2025:

Ministry of Justice – Administration for Enforcement of Criminal Sanctions

The Administration for Enforcement of Criminal Sanctions continuously implements measures and activities aimed at implementing the recommendations of the European Committee for the Prevention of Torture, Inhuman and Degrading Treatment or Punishment provided in the Committee's Report following visits to the Republic of Serbia in 2021 and 2023, which have been incorporated into the text of the Strategy for the Development of the System for the Enforcement of Criminal Sanctions for the period 2022-2027.

With the implementation of the Strategy for the Development of the System for the Enforcement of Criminal Sanctions for the period 2022-2027, the following results have been achieved: the construction of new facilities has provided accommodation capacity for 12,145 persons deprived of liberty, significantly reducing overcrowding in the penitentiaries and

improving the living conditions. As of December 25, 2025, there were 11,344 persons deprived of liberty in the institutions for the enforcement of criminal sanctions. Although, in quantitative terms, the capacities exceed the current needs in terms of the total number of places, there remains an uneven workload, which is reflected in the overcrowding of closed-type penitentiaries and closed sections. In this regard, in accordance with the Action Plan which accompanies the Strategy and the priority list for the adaptation and construction of new facilities, procedures have been initiated for the construction of new prisons in Kruševac, Subotica and Sombor. Additionally, funds have been secured for the development of project documentation for the construction of a new detention unit in the Novi Sad District Prison, in line with the recommendations of the European Committee for the Prevention of Torture. In 2025, the construction of a new pavilion to accommodate 216 convicted persons at the Penitentiary in Požarevac-Zabela and a pavilion to accommodate 200 convicted persons at the Penitentiary in Sremska Mitrovica was initiated.

During the implementation of the Strategy, in the reporting period, the following significant investment projects are highlighted: a closed-type penitentiary was built in Kragujevac in October 2022, with a capacity for 500 persons deprived of liberty; in the District Prison in Belgrade, the complete reconstruction of the facility, which includes 12 accommodation blocks, was completed in March 2024; in December 2025, the construction of a closed section building for the accommodation of 250 convicted women at the Penitentiary for Women in Požarevac was completed.

In addition to the expansion of accommodation capacity in penitentiaries and the results achieved in the development of the system of alternative sanctions, it is also important to highlight that the issue of overcrowding has been addressed through more efficient implementation of programs for convicted persons, the introduction of new specialized treatment programs, as well as the conditional release of convicts.

Through the implementation of the Council of Europe project, financed by the EU under the project “Horizontal Facility for the Western Balkans and Turkey” in the area of “Strengthening the Protection of Human Rights of Persons Deprived of Liberty”, significant progress has been made in the development and implementation of new specialized treatment programs aimed at the successful re-socialization of convicted persons. Ten specialized treatment programs have been introduced, which, after the training of staff in the treatment service, are being applied in the institutions for the enforcement of criminal sanctions (three programs are in the pilot phase: the Suicide and Self-Harm Prevention Program, the Life Skills Program for Juveniles, and the Women's Empowerment Program in Prison). An evaluation of the training results was conducted, and it was determined that staff members significantly improved their knowledge and skills for implementing the new programs, ensuring the sustainability of the project.

In accordance with the Strategy for the Development of the System for the Enforcement of Criminal Sanctions for the period 2022-2027, in the area of healthcare, the emphasis has been placed on the humanization of accommodation conditions and the improvement of professional work with persons deprived of liberty with mental disorders.

This goal includes two components: one is infrastructural – the construction of a new facility and the other relates to the development of specialized treatment programs for persons with mental disorders and the training of healthcare staff for the implementation of these programs.

The main infrastructural investment in this area is the construction of a department at the Special Prison Hospital in Belgrade-Padinska Skela, aimed at expanding the capacity of this facility for persons subject to the security measure of compulsory psychiatric treatment and custody in a healthcare institution, given the current number of persons undergoing this measure. The new facility is planned to accommodate 500 persons deprived of liberty, in accordance with European standards, at the location of the Penitentiary in Belgrade-Padinska Skela. In line with this, a Feasibility Study has been developed and submitted to the Committee. The Administration is in the process of obtaining approval for a loan from the Council of Europe Development Bank to secure funds for the construction of the hospital.

The second component is being implemented through the project "Improvement of the Treatment of Prisoners with Mental Health Problems", financed by the European Union and implemented by the Administration in cooperation with the Council of Europe since September 2025. The project includes the development of individual treatment programs, in line with European standards, psychosocial programs, and occupational therapy for persons with mental disorders, as well as the training of prison staff to work with this category of persons deprived of liberty.

The Special Prison Hospital in Belgrade has established cooperation with the Clinic for Psychiatric Diseases Dr. Laza Lazarević in Padinska Skela, based on an agreement reached between the Ministry of Justice and the Ministry of Health to make available capacities in this psychiatric hospital for the accommodation of a number of forensic patients.

At the Juvenile Correctional Facility in Kruševac, individual and group work is applied with juvenile offenders through specialized programs: the general cognitive-behavioral program, the program for perpetrators of violent criminal offenses, the program for drug and alcohol addicts, and the assertive communication program. Pilot implementation of new treatment programs is currently underway (life skills for juveniles, empowerment of juvenile girls, and prevention of self-harming behavior).

Regular educational activities for juvenile residents are conducted in all units of the Juvenile Correctional Facility. Classes are held daily and without interruption, including in the Intensive Work Unit, in accordance with the organization of life and work in that unit. Education is carried out according to the school curriculum for functional adult basic education, divided into three cycles so that a student completes elementary school within three years. Upon completion of elementary school, residents are given the opportunity to continue their education through secondary schooling. Since the Committee's visit focused on the work and treatment of juveniles assigned to the Intensive Work Unit at the Juvenile Correctional Facility in Kruševac, the new administration of the institution acted on the given recommendations and undertook comprehensive measures to improve the implementation of the educational measure in this unit. In addition to implementing the established program of treatment for residents, additional forms of educational-corrective work were introduced meaningful daily activities, a new organization of educational work and expanded sports activities. The implementation of the new work regime in this unit will enable residents to acquire the conditions for subsequent assignment to the general enforcement regime within a shorter period, and thus more intensive work will contribute to meeting the conditions necessary for submitting a proposal for the suspension of the educational measure. In order to facilitate the re-socialization process, foster positive personal changes and ensure adequate behavior, the following activities and interventions are applied in the work in accordance with the purpose of the imposed educational measure:

A support team for educational work with residents at increased risk has been established. The team currently consists of eight treatment officers. The purpose of this form of work is to provide additional support in working with residents who are at increased risk based on the following criteria: resistance to the imposed educational measure or the prescribed treatment approach, frequent disciplinary offenses with elements of violence and a tendency toward self-harm.

Through continuous educational-corrective work and an individual approach, staff strive to influence the appropriate behavior of residents in the institution, while simultaneously addressing heterogeneous problems that exist from earlier and are related to the environment from which the juveniles come. It is important to emphasize that residents assigned to the general regime move freely within the institution, and their primary tutors and other staff who work with them directly and implement the prescribed treatment are constantly available, without additional or special notifications or procedures, which positively affects the possibility of building trust and allows residents to present their problems and needs at favorable moments.

Additionally, residents in the Intensive Work Unit have constant direct contact with staff from the Treatment Service and other departments. Furthermore, since April 2025, the above-mentioned forms of additional support work, educational programs, and specialized treatment programs (general cognitive-behavioral program, specialized program for violent offenders, assertive communication program) have been applied, all aimed at developing capacities for non-violent problem-solving and peer conflict resolution. Experienced professionals, through daily conversations, map possible risk factors and develop a detailed plan for further treatment work.

Ministry of Interior

Recommendation.docx

Supreme Public Prosecution Office

Concise response to the key recommendations are contained in the annex „3.8. Prevention of torture and ill-treatment SPPO".

We remain at your disposal for any additional information.

Annex 1 - 3.8. Prevention of tortur

Ministry of Human and Minority Rights and social Dialogue

The Draft Fourth Periodic Report on the Implementation of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment was adopted at the Government session held on 30 December 2025 (No.: 337-14763/2025). The Report was submitted to the UN Committee against Torture.

On 28 July 2025, the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) received the Responses and comments of the competent institutions of the Republic of Serbia to the report on the ad hoc visit to Serbia conducted by the CPT delegation from 14 to 22 November and from 16 to 18 December 2024.

In accordance with the Committee's request to be regularly and periodically informed about the medical care provided to two minors placed in long-term care in psychiatric institutions in Belgrade, the requested updated information was submitted to the Committee on 12 December 2025. The Committee notified Serbia that it has been included in the programme of regular periodic visits for 2026. Monitoring the implementation of Council of Europe recommendations and bodies, including the CPT, will be addressed at upcoming Council sessions.

Ombudsman

Within its mandate as the National Preventive Mechanism (NPM), the Protector of Citizens continues to address issues identified in the CPT's 2022 periodic report, in particular those related to police custody and the prevention of ill-treatment at the early stages of deprivation of liberty.

Since 2021, cooperation with civil society organisations involved in NPM activities has been expanded, ensuring the participation of organisations with diverse professional profiles, including expertise in forensic medicine and psychiatry, special pedagogues and psychologists. Cooperation is established through a public call issued every two years, most recently in October 2024, resulting in an increased number of organisations involved in NPM monitoring. This cooperation supports a multidisciplinary approach and contributes to transparency and independence in the implementation of NPM activities.

In line with CPT standards and the Committee's interest in the methodology for monitoring police custody, the NPM applies a consistent methodology focused on the treatment of persons deprived of liberty by the police. This includes confidential interviews with detained persons, with particular attention to vulnerable groups and persons considered to be at higher risk of ill-treatment, review of detention-related documentation, interviews with police officers and inspection of detention premises. Based on its findings, the NPM issues recommendations aimed at improving safeguards and preventing ill-treatment. Reports and the authorities' responses are made public.

Police custody remains a central area of NPM monitoring, reflecting the issues highlighted by the CPT.

- In 2022, the NPM conducted 49 visits to police stations (out of 87 total visits) and addressed 94 recommendations to the Ministry of Interior.
- In 2023, 59 police station visits were carried out (out of 90 total visits), resulting in 59 recommendations addressed to the Ministry of Interior.
- In 2024, the NPM conducted 43 visits to police stations (out of 74 total visits), issuing 84 recommendations addressed to the Ministry of Interior.
- In 2025 (as of 25 December), 35 visits to police stations were conducted (out of 85 total visits), with 36 recommendations addressed to the Ministry of Interior.

Through continuous monitoring, reporting and follow-up on recommendations related to police custody, the Protector of Citizens contributes, within the scope of its mandate, to the implementation of CPT standards and to the prevention of torture and ill-treatment.

- Please inform on steps taken to amend the provisions on life imprisonment without possibility of parole that directly violates the ECHR and the case law of the ECtHR.

Ministry of Justice

Ministry of Justice prepared the Draft Law on Amendments and Supplements to the Criminal Code that was discussed during the public debate in October 2024. Bearing in mind the

significant public interest, an additional round of public debate was held from 10 September to 1 October 2025. The Draft Law on Amendments and Supplements to the Criminal Code was subsequently sent to the European Commission on 15 October 2025. The clarification requests were sent by the European Commission on 11 November 2025 and the Ministry of Justice submitted all replies on 14th January 2026.

All materials related to the amendments regarding the provisions on life imprisonment are still being considered. Namely, within the Working Group for Drafting the Amendments and Supplements to the Criminal Code, there were various proposals to further analyze this issue. The final decision on this matter will be made when the Draft Law on Amendments and Supplements to the Criminal Code is submitted to the national legislative procedure. The adoption of this law is expected by the end of the first quater of 2026.

3.9. Property rights, including implementation and review of the 2011 Law on restitution

- Please provide updated information on the enforcement of the 2011 Law on restitution.

Agency for Restitution

The Agency for Restitution has received a total of 75,414 claims for the restitution of property and compensation, submitted in accordance with the Law on Property Restitution and Compensation (Official Gazette of the Republic of Serbia, Nos 72/2011, 108/2013, 142/2014, 88/2015 – Constitutional Court Decision, 95/2018 and 153/2020).

The Law on Property Restitution and Compensation is effectively applied and implemented. As of December 2025, decisions had been adopted in 71,086 cases, representing approximately 94.26 % of all submitted claims.

From its establishment in March 2012 until December 2025, the Agency for Restitution returned to the legal heirs of former owners 5,421 commercial buildings, 1,265 apartments and 1,539 other buildings, with a total surface area of approximately 596,000 square metres, as well as 102,650 hectares of agricultural land, 7,534 hectares of forests and forest land, and approximately 789 hectares of undeveloped construction land.

As of December 2025, the Agency for Restitution had adopted 7,496 decisions on compensation. The total value of compensation determined by those decisions exceeds EUR 292 million.

- Please provide information on how many claimants remain where the Restitution Agency has determined the merits of their claim but where the geodetic experts of the claimants have not yet found equivalent land to finalise the restitution process.

Agency for Restitution

The number of claims in which the claimants' geodetic experts have not yet identified equivalent land due to the exhaustion of the land fund is approximately 2,000. In addition, in approximately 500 cases, the subject matter of the claims consists of aggregated land and land in respect of which land consolidation procedures were completed after the adoption of the List.

- As it has been concluded that there is not enough land on the list to settle the remaining claims, when will the Ministry of Agriculture provide an expanded list of plots to be able to settle all claims?

Agency for Restitution

During 2025, the Agency for Restitution addressed the Agricultural Land Administration by letters dated 6 May, 25 July, 20 October, and 8 December, requesting the expansion of the List of Plots eligible for return in the restitution procedure. In those letters, the Agency identified the municipalities in which the land fund designated for restitution had been fully exhausted, as well as the municipalities in which land consolidation and land aggregation procedures had been carried out following the adoption of the List. No reply was received from the Agricultural Land Administration to any of the letters submitted by the Agency for Restitution.

The Ministry of Finance, acting as the second-instance authority responsible for deciding on appeals against decisions of the Agency for Restitution, has, on several occasions, confirmed in its decisions that, pursuant to Article 2(6) of the Regulation on Criteria for Determining the Surface Area of Agricultural and Forest Land in the Restitution Procedure, where the land area referred to in Article 2(3) is insufficient to resolve all claims for the return of property, or where the Administration fails to determine cadastral plots for restitution in accordance with Articles 3 and 4 of that Regulation, agricultural land is to be returned in accordance with Article 2(1), (2) and (5) thereof.

In those circumstances, where the Administration does not publish an expanded List of Plots, the Agency will return agricultural land outside the plots included in the List, thereby addressing the exhaustion of the land fund for the return of consolidated and aggregated land.

- Please provide updated information on the enforcement of the law on the restitution of heirless Jewish property.

Agency for Restitution

Pursuant to the Law on Remedying the Consequences of the Seizure of Property of Holocaust Victims with No Living Legal Heirs, property has, to date, been returned to Jewish communities as follows: to the **Jewish Community of Belgrade**, 147 properties located in Belgrade, comprising 101 business premises, 33 apartments, 8 garages and 5 buildings; to the **Jewish Community of Subotica**, 12 business premises and 3 buildings; to the **Jewish Community of Zrenjanin**, 10 apartments, 5 business premises and 6 buildings; to the **Jewish Community of Zemun**, 1 apartment and 1 business premise; to the **Jewish Community of Novi Sad**, 12 business premises, 4 apartments and 6 buildings; to the **Jewish Community of Pančevo**, 4 business premises; and to the **Jewish Community of Kikinda**, 1 building. In total, 212 properties, with a total surface area of 15,274.04 square metres, have been returned to date.

In addition, agricultural land has been returned as follows: to the **Jewish Community of Kikinda**, 85 he 70 a 89 sqm to the **Jewish Community of Subotica**, 1,084 he 02 a 82 sqm to the **Jewish Community of Zrenjanin**, 440 he 76 a 25 sqm to the **Jewish**

Community of Pančevo, 84 he 22 a 78 sqm to the **Jewish Community of Novi Sad**, 1,157 he 84 a 91 sqm and to the **Jewish Community of Sombor**, 575 he 60 a 02 sqm In total, 3,428 he 17 a 67 sqm of agricultural land have been returned to date.

Furthermore, 921 sqm of undeveloped construction land has been returned to the **Jewish Community of Zrenjanin** and 1,034 sqm of undeveloped construction land to the **Jewish Community of Kikinda**.

The estimated value of the property returned to date exceeds EUR 50 million; however, the valuation of the returned property is ongoing.

3.10. Execution of ECtHR judgments

- Please inform on steps taken to improve the legal regulation of the status of Serbia's Government Agent before the European Court of Human Rights and the process of execution of ECtHR judgments (role of the Government Agent in the process, obligations of other Government institutions (e.g. their involvement in writing the action plans), coordination mechanism, role of the Parliament, etc.)? We would like to clarify that this question does not relate to the implementation of individual judgments of the ECtHR but to the systemic functioning of the Government Agent, as elaborated in the above question.

Ministry of Justice

The Ministry of Justice is of the opinion that it is necessary to conduct a comprehensive analysis of the comparative-legal regulation of the position of representatives of member states of the Council of Europe before the European Court of Human Rights and, in line with the analysis, proceed with the implementation of the measures and activities listed therein. The formalisation of the procedure for the implementation of the decisions and judgments of the European Court of Human Rights cannot be regulated by law, for the reason that in the judgments of this Court, member states of the Council of Europe are often required to harmonise their legislation with international standards established by the European Court of Human Rights. Bearing in mind that the obligations of a member state often refer to the amendments of a law or the adoption of a new one, such an obligation cannot be complied with by means of a separate law, but in each individual case, by amending the regulations existing in the legal system of the member state. Frequently, the obligations of the state contained in the judgment of the European Court for Human Rights require the coordination of the work of several state authorities and therefore the implementation of the judgments of the European Court is regulated by a special action plan that is adopted upon delivery of each individual judgment. The special action plan designates the authorities that will coordinate the implementation of a specific decision.

- What concrete actions have you taken, or plan to take, to address the recommendations from the '*Needs assessment on the execution of the judgment of the European Court of Human Rights in relation to Serbia'* produced in 2020 under the EU-Council of Europe Horizontal Facility?

Ministry of Justice

The Ministry of Justice is of the opinion that it is necessary to conduct a comprehensive analysis of the comparative-legal regulation of the position of representatives of member states of the

Council of Europe before the European Court of Human Rights and, in line with the analysis, proceed with the implementation of the measures and activities listed therein. The formalisation of the procedure for the implementation of the decisions and judgments of the European Court of Human Rights cannot be regulated by law, for the reason that in the judgments of this Court, member states of the Council of Europe are often required to harmonise their legislation with international standards established by the European Court of Human Rights. Bearing in mind that the obligations of a member state often refer to the amendments of a law or the adoption of a new one, such an obligation cannot be complied with by means of a separate law, but in each individual case, by amending the regulations existing in the legal system of the member state. Frequently, the obligations of the state contained in the judgment of the European Court for Human Rights require the coordination of the work of several state authorities and therefore the implementation of the judgments of the European Court is regulated by a special action plan that is adopted upon delivery of each individual judgment. The special action plan designates the authorities that will coordinate the implementation of a specific decision.

- Please inform on Serbia's measures regarding the leading judgements of the ECtHR that are pending implementation. Please provide information on Serbia's monitoring mechanism regarding outstanding ECtHR judgements.

Ministry of Justice

Regarding the question concerning measures taken by the Republic of Serbia with respect to leading judgments of the European Court of Human Rights that are pending implementation, we inform you as follows:

In the case of Kovač v. Serbia, application no. 6673/12, judgment of 18 January 2022, the applicant's complaint concerned the allegation that, contrary to Article 5 paragraph 4 of the Convention, domestic courts did not provide an opportunity to respond to a request from the investigating judge for an extension of detention, nor did they personally hear the applicant or his legal representative when deciding on the said extension of detention.

In order to address the identified deficiencies regarding procedural guarantees under Article 5 paragraph 4 of the Convention, amendments to the Criminal Procedure Code have been made, explicitly establishing the obligation of the court to hear the defendant regarding the reasons for detention before deciding on the imposition or extension of detention during the investigation.

These amendments have been incorporated into Article 214 of the Criminal Procedure Code, further specifying the right of the defendant and their defence counsel to appeal in cases where a panel overturns the first-instance decision and imposes detention for the first time, as well as the obligation for urgent proceedings and short deadlines for deciding on the appeal (48 hours).

In this way, the legislative framework is being improved to ensure effective judicial review of the lawfulness of detention, in accordance with the standards of the European Court of Human Rights.

The Draft Law on Amendments and Supplements to the Criminal Procedure Code has been submitted for the opinion of the European Commission. In the meantime, the Ministry of Justice has prepared and sent responses to the comments of the European Commission to clarify certain contentious issues. Following receipt of the Commission's opinion, the Draft Law will proceed to the next stage of the legislative adoption process.

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Regarding the European Court of Human Rights judgment of 16 June 2020, in the case of Boljević v. Serbia, application no. 47443/14, we inform you that the Ministry of Justice is also working on drafting amendments to the Civil Procedure Law. Given that these amendments are extensive, additional consultations on specific provisions are being conducted, followed by further work on the draft text of the law. It is planned that this process will be completed by the end of 2026.

State Attorney's Office

At the time of the preparation of the present response (26 December 2025), 19 leading cases concluded before the European Court of Human Rights (hereinafter: "the Court") are under the supervision of the Committee of Ministers of the Council of Europe (hereinafter: "the CM"), three of which are subject to enhanced supervision. In this context, basic information will be provided for each leading case concerning the violation of rights under the European Convention on Human Rights and Fundamental Freedoms (hereinafter: "the Convention"), as well as information on the key individual and general measures that have been taken or are envisaged within the framework of the execution of the respective judgment.

It is also important to note that in the case of *Zuvić v. Serbia*, no. 3592/17, the deadline for submitting the action plan/report to the CM is still ongoing. This implies that individual and general measures for the execution of this judgment are still under consideration by the domestic authorities, and therefore, the information cannot be disclosed at this time.

Finally, in the HUDOC-EXE database, due to an apparent oversight, the case of *Kajganić v. Serbia*, no. 27958/16, is marked as a leading case, although the description clearly indicates that it is a repetitive case concerning the excessive length of civil proceedings.

- *Selimi and Krasnici v. Serbia*, no. 20641/20

Case Description: The case relates to the applicants' failure to have a reasonable opportunity to effectively contest the interference with their rights in administrative and judicial proceedings which have been pending since 2013 and 2017 respectively, concerning the suspension of their pensions awarded and disbursed by the Serbian Pensions and Disability Insurance Fund (SPDIF) branch office in AP Kosovo and Metohija prior to it being placed under international administration in 1999 (violation of Article 1 of Protocol No. 1). The case further concerns the excessive length of the said administrative and judicial proceedings (violation of Article 6). The Court found that the proceedings were not of exceptional complexity, that they called for particular diligence given that they concerned pension-related disputes, and that their duration resulted from repeated remittals.

Individual measures: In respect of the first applicant, the domestic proceedings concerning the reinstatement of pension payments were concluded after the SPDIF rejected the request on the grounds that the applicant was already receiving a pension from the provisional self-government institutions in Priština, a decision which was not challenged before the Administrative Court.

As regards the second applicant, the request for reinstatement of pension payments was likewise rejected on the same legal grounds, and the ensuing administrative dispute is currently pending before the Administrative Court.

In addition, the civil proceedings initiated by the second applicant for compensation due to the non-payment of pension benefits resulted in a final judgment ordering the SPDIF to pay compensation, statutory default interest and litigation costs.

General measures: The authorities reported to the CM substantial progress in the administrative handling of requests for the reinstatement of pensions suspended in 1999, with the majority of cases processed and a significant number of final decisions adopted, demonstrating a high level of administrative completion and compliance with the relevant judgments of the Court (*Grudić v. Serbia*, no. 31925/08 and *Selimi and Krasnici v. Serbia*).

Domestic judicial proceedings concerning pension suspensions continue to be examined by the Administrative Court, which has delivered a number of recent judgments, thereby confirming continued access to judicial remedies and the development of consistent domestic case-law in this area. Statistical data on the work of the Administrative Court indicate both structural challenges and notable recent improvements in efficiency and case management, including a marked increase in the rate of resolved cases alongside a reduction of the overall backlog.

The Serbian authorities remain fully committed to taking all necessary measures to ensure the prompt and effective resolution of cases before the Administrative Court, in line with its obligations under Article 46 of the Convention.

- *Ali v. Serbia*, no. 4662/22 (Enhanced supervision)

Case Description: The case relates to the domestic authorities' failure, during the period 2021–2022, to assess the applicant's allegation of a risk of ill-treatment in a manner consistent with the standards established in the Court's case-law prior to his extradition to Bahrain (violation of Article 3), as well as to their failure to comply with the interim measure indicated by the Court under Rule 39 (violation of Article 34). The Court found that, rather than conducting a substantive assessment of the applicant's alleged fear of persecution, the domestic authorities limited themselves to a purely formal review of whether the statutory conditions for extradition had been met. The domestic courts neither examined the general human rights situation in Bahrain nor carried out any meaningful, let alone sufficient, assessment of the applicant's individual circumstances; moreover, they did not seek relevant international reports concerning the situation in Bahrain, including one indicating that the applicant had previously been subjected to ill-treatment, and they did not afford the applicant an opportunity to substantiate his allegations.

Individual measures: The Serbian authorities have communicated with the Bahraini authorities regarding the conditions in which the applicant is held during the serving of his life sentence. According to the information provided, the applicant has had continuous access to legal representation, family visits and effective legal and administrative remedies throughout his detention, in accordance with domestic law and international standards.

The conditions of detention are reported to comply with applicable health and hygiene requirements, with regular oversight by independent monitoring bodies and daily access to outdoor exercise, while the applicant is not held in solitary confinement. The applicant receives adequate medical care equivalent to that provided to the general population, including regular medical examinations, specialist consultations and referrals to public hospitals when necessary. Nutritional needs are met through balanced meals, access to drinking water and dietary adjustments based on medical advice, and any hunger-strike

situations are addressed promptly under medical supervision. The Bahraini authorities further report that detention facilities are subject to independent oversight and accountability mechanisms, ensuring ongoing monitoring of treatment and conditions during the applicant's imprisonment.

The Serbian authorities will maintain communication with their Bahraini counterparts and are prepared to supply any further explanations or documentation that the CM may request.

General measures: The authorities are prepared to provide the CM with examples of domestic case-law demonstrating that national courts, in extradition proceedings concerning foreign nationals, thoroughly examine claims regarding the risk of ill-treatment or persecution in the event of surrender to the requesting State. Furthermore, the organization of trainings for judges and judicial associates handling cases of international criminal legal assistance, focused on the standards established in the case-law of the Court regarding the assessment of risks of treatment contrary to Article 3 of the Convention in extradition cases, could constitute a significant general measure. Publication and dissemination of the specific judgment within the domestic professional community may also serve as an important general measure.

- *COBANTUR TURIZM TICARET VE NAKLIYAT LTD. v. Serbia, no. 32398/19*

Case Description: This case concerns the violation of the applicant company's right to the peaceful enjoyment of its property due to the 2016 seizure and subsequent confiscation of its vehicle in the course of criminal proceedings (violation of Article 1 of Protocol No. 1). The Court found that the compulsory confiscation of the vehicle, combined with the absence of a practical means to obtain compensation, failed to adequately consider the company's property rights. Consequently, it concluded that the fair balance between the general interest and the company's right to peaceful enjoyment of its possessions was not properly maintained, and that the resulting burden on the applicant company was disproportionate

Individual measures: Having regard to the fact that the applicant company did not submit a claim for the payment of a monetary amount in respect of just satisfaction before the Court, the State is under no obligation to pay any sum in that regard. However, the Serbian authorities note that the applicant company did not seek a request for the protection of legality following the delivery of the Court's judgment and, in any event, was not entitled to lodge such a remedy, as this extraordinary legal remedy is reserved to the public prosecutor, the defendant and the defendant's counsel, while an injured party may pursue compensation through civil proceedings.

In light of these considerations, the authorities take the view that no further individual measures are required in the present case.

General measures: The authorities have undertaken a range of legislative, judicial and awareness-raising measures to address the shortcomings identified by the Court regarding the confiscation of property.

Amendments to the Criminal Code are being prepared with the aim of ensuring that confiscation of property belonging to legal persons is ordered only under conditions that guarantee a fair, proportionate and Convention-compliant assessment, particularly in cases involving *bona fide* third parties. The Supreme Court's case-law confirms that confiscation is not applied automatically, but requires an individualized assessment of necessity and

proportionality, taking into account the specific role of the object concerned and the circumstances of each case, in line with Article 1 of Protocol No. 1. These standards have been actively promoted through targeted training and professional discussions involving judges, prosecutors and other relevant stakeholders, with a focus on preventing automatic confiscation and reinforcing judicial scrutiny.

In addition, the judgment has been translated, published and widely disseminated, ensuring that domestic courts and relevant authorities are fully aware of the Court's findings and their obligation to apply confiscation measures in a Convention-compliant manner.

- *Raduk v. Serbia*, no. 13696/23

Case Description: The case concerns unfairness in criminal proceedings conducted in 2019, as the applicant was exposed to a risk of police entrapment owing to the absence of adequate procedural safeguards in the course of the proceedings (violation of Article 6 § 1). The Court found that, despite the existence of a clear and foreseeable legal framework governing the authorisation and conduct of undercover operations, the prescribed procedure was not complied with, and the domestic courts moreover failed to properly examine the applicant's allegations of police entrapment.

Individual measures: Having regard to the fact the Court considered that, in the specific circumstances of the present case, the finding of a violation of the Convention constituted in itself sufficient just satisfaction for any non-pecuniary damage sustained by the applicant, the State is under no obligation to pay any sum in respect of non-pecuniary damage. Also, the applicant hasn't claimed any amount in respect of pecuniary damage or costs of the proceedings.

The authorities reported to the CM that the applicant has not requested reinstatement to his former position at the Customs Administration and has not been reinstated, and that his employment was terminated *ex lege* following a final criminal conviction, without an administrative dispute having been initiated. The Customs Administration was informed of the Court's judgment through correspondence from the Agent's Office and confirmed that the termination decision had become final prior to that notification. Following the delivery of the Court's judgment, the applicant lodged a request for the protection of legality with the Supreme Court within the prescribed time-limit, invoking an alleged violation of rights guaranteed by the Convention. The proceedings concerning this request are currently pending, and the authorities have undertaken to keep the CM informed of any further developments.

General measures: Having regard to the fact that, in the present judgment, the Court held that there existed a clear and foreseeable legal framework for authorising and conducting undercover operations, the domestic authorities have placed their focus on domestic case-law that is aligned with the standards of the Convention. The Supreme Court has developed consistent case-law on the lawfulness of evidence obtained through special investigative measures, requiring prior judicial authorisation and excluding unlawfully obtained evidence, while ensuring that allegations of police entrapment are duly and substantively examined. This jurisprudence demonstrates that domestic courts carry out an individualised assessment of the necessity, lawfulness and proportionality of such measures and that procedural shortcomings do not automatically lead to the quashing of convictions where they have not affected the fairness of the proceedings as a whole.

The dissemination of the Court's judgment and its findings to domestic courts and relevant authorities further ensures alignment of judicial practice with Convention standards and the prevention of similar violations in the future.

- *Lubarda and Milanov v. Serbia*, no. 6570/19

Case Description: The case concerns the unfairness of the applicants' misdemeanour proceedings conducted in 2015 and 2017, in that they were denied the opportunity to cross-examine witnesses, while no sufficient counterbalancing safeguards were provided to offset the resulting restriction of their defence rights (violation of Article 6 §§ 1 and 3). The Court found that the applicants' convictions were based on reports signed by them at the scene but subsequently contested before the courts, as well as on the witness statements of police officers. It observed that the case file contained no indication that the domestic authorities treated the police officers' evidence with particular caution or that the examination of the witnesses in the absence of the defence led the trial courts to attribute reduced evidential weight to their statements. Moreover, despite the applicants' explicit requests to question the police officers, neither they nor their lawyers were invited to attend the examinations, nor was there any indication that they were afforded an opportunity to submit written questions to the police officers.

Individual measures: The applicants were awarded just satisfaction by the Court for non-pecuniary damage, while their claims for pecuniary damage were rejected due to the absence of a causal link with the procedural violation. Domestic law allows for the reopening of final misdemeanour proceedings where a Court judgment establishes a human-rights violation that could have affected the outcome. Following the judgment, one applicant submitted a request for reopening under these provisions, while the other did not. The authorities will keep the CM informed of the progress in the pending reopening proceedings.

General measures: The Constitutional Court has aligned its case law with the Court's standards, finding violations of the right to defence where applicants and their counsel were denied the opportunity to participate in witness examinations. It annulled impugned lower court decisions and ordered re-examination, reinforcing guarantees of oral hearings, adversarial proceedings, and effective examination of witnesses. The Misdemeanour Appellate Court has consistently applied similar standards, quashing or amending first-instance decisions that failed to respect procedural guarantees under Article 6 of the Convention. This case law demonstrates a sustained practice of ensuring equality of arms and the right to examine witnesses in domestic misdemeanour proceedings.

Publication and dissemination measures have made the Court's findings widely accessible to judges and the legal community, ensuring awareness and compliance with Convention requirements in similar cases.

- *Simić v. Serbia*, no. 9172/21

Case Description: This case concerns insufficient reasoning in the 2010 decisions of the High Court authorising the application of secret surveillance measures (telephone tapping) against the applicant (Article 8). The Court observed that the decisions contained no

substantive analysis explaining why the investigation could not have been conducted by other means or why the use of such alternative measures would have been difficult in the specific circumstances of the applicant's case.

Individual measures: Having regard to the fact the Court considered the finding of a violation of the Convention constituted in itself sufficient just satisfaction for any non-pecuniary damage sustained by the applicant, the State is under no obligation to pay any sum in respect of non-pecuniary damage. As regards the amount awarded in respect of costs and expenses, the domestic authorities paid the sum to the applicant in a timely manner.

The applicant did not seek just satisfaction in respect of pecuniary damage before the Court, although domestic legislation provides a concrete and effective avenue to claim such damage within a prescribed time-limit; to the authorities' knowledge, this avenue has not been used yet. Following the Court's judgment, the applicant lodged a request for the protection of legality - extraordinary legal remedy - before the Supreme Court, as provided by the Criminal Procedure Code in cases where a Convention violation has been established. This request is currently pending, and the authorities will keep the CM informed of any further developments.

General measures: Following the Court's judgment, the authorities adopted measures aimed at preventing similar violations, focusing on case-law, training, and dissemination. The Supreme Court has developed Convention-compliant jurisprudence concerning secret surveillance, demonstrating its readiness to annul final judgments where evidence was obtained in breach of procedural safeguards, while applying a proportionality test to assess whether any irregularities had a decisive impact on the outcome of the case. At the same time, it clarified that not every procedural irregularity automatically renders a conviction unlawful if the judgment is supported by other independent evidence.

Furthermore, the Judicial Academy has implemented extensive training and awareness-raising activities addressing Article 8 of the Convention and the Court's standards on interference with private life, involving judges, prosecutors, and other judicial actors. Although not all trainings focused specifically on secret surveillance, they consistently covered the Convention requirements and relevant case-law. Finally, the Court's judgment was translated, published, and widely disseminated, together with an analytical overview prepared by the Government Agent, ensuring that domestic courts and relevant authorities are fully aware of the Court's findings and the need to comply with Convention standards in future cases.

- *Yaylali v. Serbia*, no. 15887/15

Case Description: This case concerns an unjustified interference with the applicant's property rights resulting from the confiscation in 2013 of his lawfully acquired jewellery and the imposition of a fine due to his failure to declare it to the customs authorities while transiting through Serbia (Article 1 of Protocol No. 1). The Court found that the automatic nature of the confiscation, applied in addition to the fine, placed an individual and excessive burden on the applicant, since it afforded no discretion to the domestic authorities to examine the proportionality of the measure and denied the applicant any realistic possibility of effectively challenging it.

Individual measures: The domestic authorities took measures to ensure that the violation ceased and that the applicant was afforded redress for the consequences identified by the

Court. The applicant sought just satisfaction only in respect of pecuniary damage, and the Court awarded compensation corresponding to the value of the confiscated jewellery, which has been duly paid. As regards the reopening of the misdemeanour proceedings, domestic law allows reopening following a judgment of the Court, but in the present case this was no longer possible due to the expiry of the relevant statutory time-limits. In these circumstances, the Serbian authorities consider that no further individual measures are required.

General measures: The authorities have taken comprehensive general measures aimed at preventing similar violations, with a particular focus on aligning domestic judicial practice with the standards of the Court concerning the protection of property. The Constitutional Court has progressively adjusted its jurisprudence to fully reflect the principles flowing from Article 1 of Protocol No. 1, especially the requirements of legality, legitimate aim and proportionality. In doing so, it has increasingly relied on the Court's case-law when assessing the constitutionality of confiscation measures in misdemeanour proceedings. In addition, the Constitutional Court has undertaken an internal review of its own practice through specialised analytical work, with the aim of identifying and consolidating Convention-compliant standards in cases involving interference with property rights. This has resulted in greater consistency and foreseeability in the application of constitutional safeguards. The Constitutional Court has also taken into account the Court's findings when deliberating in pending cases, demonstrating full alignment with Convention requirements.

At the same time, the Misdemeanour Appellate Court has developed a consistent body of case law in which it applies the proportionality test when reviewing confiscation and other similar measures. In its reasoning, the court assesses whether such measures pursue a legitimate public interest and whether they impose an excessive individual burden. This approach confirms that confiscation is no longer treated as automatic, but is subject to judicial scrutiny in light of the specific circumstances of each case.

Finally, the Court's judgment has been translated, published and widely disseminated, together with an analytical summary, to all relevant domestic authorities, thereby ensuring that judges and other legal practitioners are fully aware of the Court's findings and the need to apply Convention standards in future cases.

- *Mitić v. Serbia*, no. 59711/21

Case Description: This case relates to the unreasonable duration of criminal proceedings conducted against the applicant on charges of organized crime, which extended over a prolonged period before two levels of jurisdiction, amounting to a violation of Article 6 § 1.

Individual measures: The authorities note that the impugned criminal proceedings were brought to an end, as the applicant was ultimately acquitted at the appellate level, thereby terminating the violation. They further recall that the Court awarded the applicant just satisfaction in respect of non-pecuniary damage, as well as costs and expenses, and that these amounts were paid in full within the prescribed time-limit. In view of the finalisation of the domestic proceedings and the payment of just satisfaction, the Serbian authorities consider that the applicant has been fully redressed for the damage sustained.

General measures: The domestic authorities have implemented a range of measures aimed at preventing excessive length of criminal proceedings and ensuring effective remedies.

Legislative reforms introduced a new Criminal Procedure Code, enhancing efficiency through mechanisms such as prosecutorial investigation, plea bargaining, and deferred prosecution. Strategic regulatory measures have been adopted to reduce case backlogs, shorten court proceedings, and improve public trust in the judiciary. These measures have led to measurable improvements in the efficiency of criminal proceedings, including complex organized crime cases.

Awareness-raising initiatives for judges and prosecutors have been conducted to reinforce compliance with the requirement of reasonable length of proceedings under the Convention. Publication and dissemination of relevant judgments and analyses have ensured accessibility of the Court's findings to the domestic legal community. Overall, the combination of legislative, regulatory, training, and dissemination measures demonstrates the authorities' commitment to preventing similar violations.

- *Antić v. Serbia*, no. 41655/16

Case Description: The case concerns the obstruction of the applicant's exercise of the right of application due to the State's failure to comply with an interim measure indicated by the Court, which required that the applicant not be extradited to the United States for the duration of the proceedings before it (violation of Article 34). The Court found that there was no objective obstacle preventing compliance with the indicated measure, noting that the Government had at least two days to take the necessary steps to ensure the applicant's extradition did not take place.

Individual measures: The Court awarded the applicant just satisfaction for non-pecuniary damage, but payment has not yet been made because the authorities have been unable to obtain the necessary information from the applicant, who is currently in Canada. Multiple attempts to contact the applicant through his attorney have so far been unsuccessful. The authorities consider that no further individual measures are possible at this stage, but payment will be effected once the applicant provides the required information.

General measures: The authorities have taken measures to ensure rapid and effective inter-agency communication to comply with interim measures indicated by the Court under Article 34 of the Convention. A dedicated contact person has been appointed within the Ministry of Justice, and the Ministry of Internal Affairs has designated its international police cooperation section to operate on a 24/7 basis, enabling timely responses to any future interim measures. These steps aim to equip the administrative system with mechanisms to prevent similar violations.

Additionally, the Court's judgment has been translated, published, and widely disseminated to all relevant domestic authorities to ensure awareness and compliance with Convention requirements.

- *Radonjić and Romić v. Serbia*, no. 41655/16

Case Description: The case concerns a violation of the applicants' right to liberty, as the competent courts failed to provide relevant and sufficient reasoning when ordering the applicants' pre-trial detention during the period from 3 April 2015 to 6 July 2017 (violation of Article 5§3). It also concerns a violation of the applicants' right to liberty due to the

Constitutional Court's failure to comply with the requirement of "speediness" when examining the applicants' complaint challenging the lawfulness of their detention (violation of Article 5§4). The Court found that there were no exceptional circumstances to justify the delay exceeding two years, that the matters raised were relatively straightforward, and that the applicants had not caused any delay. Furthermore, it emphasized that the excessive workload of the Constitutional Court cannot serve as a justification for unduly prolonged proceedings.

Individual measures: The Serbian authorities have ensured that the violations identified by the Court have ceased, as the applicants in the present case were released from detention on remand prior to the Court's judgment. Each applicant was awarded just satisfaction for non-pecuniary damage, which has been paid within the deadline set by the Court. In view of these measures, the authorities consider that the applicants have been fully redressed and that no further individual measures are required.

General measures: The authorities have taken comprehensive general measures to prevent violations of the right to liberty under Article 5 § 3 of the Convention, focusing on ensuring that detention on remand is ordered only with relevant and sufficient reasoning. National appellate courts have developed consistent case-law, quashing decisions where detention was extended without proper justification, particularly in cases relying on public disturbance as a reason. The Constitutional Court has similarly reinforced Convention standards, reviewing constitutional appeals and requiring substantiated reasoning corresponding to Article 5 § 3. Alternative measures, such as house arrest with or without electronic monitoring, have been increasingly applied to ensure defendants' presence and the unobstructed conduct of criminal proceedings. The Constitutional Court has implemented systematic quarterly work plans to ensure expedited handling of detention-related complaints, prioritising timely resolution. Infrastructure and procedural challenges have been addressed to maintain continuity and speed in decision-making, including the recovery from disruptions affecting electronic systems.

The Judicial Academy has organised targeted training for judges, prosecutors, and police officers on the application of Article 5 and relevant case-law, enhancing awareness and practical understanding. Regional conferences and publications have further disseminated international and Court standards to legal professionals. The Court's judgment has been translated, published, and circulated among domestic authorities to ensure accessibility and compliance.

The domestic authorities continue to take general measures to prevent similar violations of the Convention and promptly inform the CM thereof.

- *Negovanović and Others v. Serbia*, no. 29907/16

Case Description: This case concerns the discrimination endured since 2007 by the four applicants, who are blind chess players, and who, unlike sighted chess players winning medals at major international competitions, were denied certain financial benefits for winning medals as members of the national team of former Yugoslavia at the Blind Chess Olympiads (violation of Article 1 of Protocol No. 12). The Court held that, although it was legitimate for the Respondent State to prioritise the highest sporting achievements and the most prestigious competitions in its award system, it did not demonstrate why the medals won by the applicants were any less significant than those won by sighted chess players.

The Court further concluded that there was no objective and reasonable justification for the differential treatment of the applicants on the basis of their disability.

Individual measures: The authorities have taken steps to at least partially bring the violation to an end and to provide redress to the applicants for the negative consequences sustained. Each applicant has been paid compensation for non-pecuniary damage in accordance with the Court's judgment, while the determination and payment of pecuniary damage remain pending due to the complexity of calculating the exact amounts. The authorities are actively seeking a solution to this issue and consider that the applicants will be fully redressed in the near future.

General measures: The authorities underline the legal and institutional complexity of the case, stemming from the temporal gap between the applicants' sporting achievements and the subsequent adoption of the regulatory framework governing the recognition and rewarding of sporting achievements, which did not encompass blind chess medalists. The institutional position of blind chess additionally complicated the case, as chess in any form was recognized as a sport by the International Olympic Committee only for a limited period, which affected the formal status and recognition of achievements attained by blind chess players. In response, the authorities have held consultations involving relevant institutions and experts, concluding that amendments to existing bylaws, notably those governing the recognition and rewarding of sporting achievements, are necessary to prevent similar violations. These consultations are ongoing, and the authorities intend to propose appropriate measures within their margin of appreciation and to inform the CM accordingly. In the meantime, publication and dissemination measures have been implemented to ensure that the Court's findings are widely accessible and known to the relevant domestic authorities.

Since December 2022, when the domestic authorities last informed the CM of the envisaged and implemented measures concerning the execution of this judgment, significant developments have taken place both with regard to the payment of all outstanding amounts owed to the applicants in respect of pecuniary damage and in relation to the preparation of amendments to the relevant secondary legislation. The CM will be informed in detail of these developments in due course.

- *Kovač v. Serbia*, no. 6673/12

Case Description: This case concerns a violation of the applicant's right to liberty arising from the domestic courts' failure to hear the applicant in person when examining the extension of his pre-trial detention, which lasted for more than five months in 2009 and 2010 during the entire judicial investigation and did not comply with the "reasonable interval" requirement established in the Court's case-law (violation of Article 5§4).

Individual measures: The Serbian authorities have taken measures to ensure that the violation has ceased and that the applicants have been redressed for the negative consequences, noting in particular that they are no longer held in pre-trial detention. The Court awarded just satisfaction in respect of non-pecuniary damage as well as costs and expenses. The awarded amounts were paid to the applicants within the time-limit set by the Court.

General measures: The Serbian authorities have envisaged general measures aimed at preventing similar violations, in line with the Court's finding that a suspect must be heard

when deciding on the extension of pre-trial detention in order to meet the "reasonable interval" requirement. To this end, amendments to the Code of Criminal Procedure are being prepared through an inclusive process involving a dedicated working group and public consultations, with the aim of introducing an explicit obligation for courts to hear defendants in person in such situations. The authorities will keep the CM informed of the progress of these legislative measures. In parallel, the judgment has been translated, published and widely disseminated, together with an analytical note, to ensure that all relevant domestic courts and prosecutorial authorities are fully aware of the Court's findings and the applicable Convention standards.

- *Boljević v. Serbia*, no. 47443/14

Case Description: This case concerns an interference with the applicant's right to respect for his private life arising from the domestic courts' refusal to reopen paternity proceedings from the early 1970s, which had become time-barred and were conducted while the applicant was still a minor (violation of Article 8). The Court emphasised that determining one's biological parentage constitutes a fundamental interest protected by the Convention, which does not diminish with the passage of time, and found that the domestic legal framework did not allow the particular circumstances of the applicant's case to be duly examined or for the competing interests to be properly balanced. It further held that the principle of legal certainty, taken alone, could not justify denying the applicant the opportunity to establish his parentage.

Individual measures: The authorities note that domestic legislation provided effective avenues for re-examination of cases, including the reopening of proceedings where a violation disclosed serious shortcomings capable of casting doubt on the outcome of the impugned proceedings. The applicant made use of this remedy and successfully sought the reopening of the impugned civil proceedings before the competent domestic court. In the reopened proceedings, the court ordered expert evidence on paternity, including DNA analysis conducted with the assistance of a court-appointed expert. The expert findings established that the applicant did not share a biological father with the person concerned, leading the domestic courts to conclude that the disputed paternity was not established. In light of these developments, the authorities consider that the applicant has been fully redressed and that no further individual measures are required in the present case.

Having regard to the fact the Court considered the finding of a violation of the Convention constituted in itself sufficient just satisfaction for any non-pecuniary damage sustained by the applicant, the State is under no obligation to pay any sum in respect of non-pecuniary damage. Also, the applicant hasn't claimed any amount in respect of pecuniary damage or costs of the proceedings.

General measures: The Court held that legal certainty alone cannot justify depriving an applicant of the right to ascertain parentage and that a proper balancing of competing interests is required in light of the specific circumstances of the case. In response, the authorities conducted extensive consultations with relevant experts and institutions in order to identify appropriate measures for the execution of the judgment. As a result, amendments to the Code of Civil Procedure were proposed and accepted in principle, aimed at allowing the reopening of certain paternity proceedings where new evidence may be obtained through modern scientific methods. The domestic authorities will inform the CM as soon as the drafted legislative amendments are adopted.

In parallel, the judgment was translated, published and widely disseminated, ensuring that all relevant domestic authorities are aware of the Court's findings and reasoning.

- *Jevtović v. Serbia*, no. 29896/14

Case Description: The case relates to the applicant's inhuman treatment by prison guards in four incidents occurring over a number of years. It also concerns the failure of the domestic authorities to carry out an effective and meaningful investigation into those incidents, notwithstanding the decision of the Constitutional Court which found a violation of the applicant's right to the inviolability of his physical and mental integrity in both its substantive and procedural aspects (violations of the substantive and procedural limbs of Article 3).

Individual measures: Following the Court's judgment, the Serbian authorities adopted measures to bring the violations to an end and to provide redress to the applicant, including the payment of the just satisfaction.

In the present case, the Court found that no investigation had been conducted into the applicant's allegations of ill-treatment by prison guards on 11 June 2007, 18 December 2009 and 22 December 2011, and that the investigation into the incident of 24 December 2011 had also been ineffective, even after the Constitutional Court's decision of 10 July 2013. In response to the judgment, the competent public prosecutor carried out evidentiary actions in respect of the incident of 24 December 2011, including questioning the applicant, interrogating three prison guards as suspects, hearing a witness, and obtaining a supplement to the forensic medical expert's findings. On 14 June 2022, an indictment was filed against three prison guards for the criminal offence of abuse and torture, which was accepted by the competent court, and the criminal proceedings are currently pending. The domestic authorities will provide relevant information to the CM on pending criminal procedure in relation to the incident of 24 December 2011.

Also, the initiation of an investigation in respect of the incidents of 11 June 2007, 18 December 2009 and 22 December 2011 is not possible under domestic law due to statute of limitations.

The authorities acknowledged that, under the applicable legislation, it was not possible to initiate disciplinary proceedings in respect of the incidents of 11 June 2007, 18 December 2009, 22 and 24 December 2011, as well as against prison guards who failed to protect the applicant, due to the expiry of the relevant statutory time-limits. They expressed regret that disciplinary proceedings had become time-barred under relevant domestic legislation, before the Court delivered its judgment.

General measures: A broad set of general measures to align domestic law and practice with the Court's case-law and prevent similar violations have been adopted. These measures include strategic reforms of the prison system, legislative changes, and strengthened safeguards for the dignity and physical and mental integrity of persons deprived of liberty. A new legal framework governing the execution of criminal sanctions introduced stricter prohibitions of torture and ill-treatment, clearer limits on the use of coercive measures, enhanced complaint mechanisms, and independent judicial oversight through judges responsible for the execution of sanctions. Internal and external supervision of prison staff was reinforced, including disciplinary accountability and improved monitoring through inspections and video surveillance.

Significant steps were also taken to improve the role of medical personnel in prisons, particularly regarding the detection, documentation, and reporting of injuries potentially linked to ill-treatment, in line with international standards. Standardized medical protocols, injury registers, photographic documentation, and specialized manuals were introduced, alongside continuous training of health-care staff. Independent monitoring bodies reported notable improvements in the prevention of ill-treatment and increased compliance with applicable standards.

In parallel, measures were adopted to strengthen the effectiveness of investigations into alleged ill-treatment, including enhanced prosecutorial powers, mandatory reporting obligations, accessible complaint avenues for prisoners, and clearer rules on disciplinary proceedings against prison staff. Finally, extensive training and awareness-raising activities were carried out for prison personnel, medical staff, judges, and prosecutors to ensure sustained compliance with Article 3 standards and the Court's findings.

- *Kačapor v. Serbia*, no. 2269/06 (Enhanced supervision)

Case Description: This case concerns violations of the applicants' right of access to a court and their right to peaceful enjoyment of their property due to the non-enforcement or delayed enforcement of domestic judicial decisions rendered in the applicants' favour against socially or State-owned companies, ordering them to pay salary arrears or other commercial debts (violations of Article 6 § 1 and Article 1 of Protocol No. 1).

Individual measures: In this case, the State has long since made all necessary payments to the applicants. However, as the *Kačapor* case, together with other similar cases, forms a group of cases under supervision by the CM, it is important to note that all payments to the applicants in respect of non-pecuniary damage and costs of proceedings are executed without significant delays and in a timely manner. Likewise, payments from the State budget of amounts awarded by domestic courts in proceedings against socially or State-owned companies are carried out without interruption or obstacles.

General measures: The general measures taken by the authorities focus on preventing further violations arising from the non-enforcement or delayed enforcement of final domestic decisions against socially or State-owned companies. A key structural issue in this group of cases has been the existence of socially-owned companies, whose number has been significantly reduced through privatization, bankruptcy, and liquidation mechanisms. The authorities have emphasized a strong and sustained political commitment to resolving the legacy problems associated with such companies and ensuring legal certainty.

In parallel, the domestic legal framework has been substantially strengthened to provide effective remedies for violations of the right to a trial within a reasonable time and the right to property. Legislative amendments have concentrated jurisdiction over complaints related to non-enforcement against socially or State-owned companies in the Constitutional Court, whose practice is fully aligned with the case-law of the Court. This reform has enabled more efficient handling of cases and ensured Convention-compliant redress at the domestic level.

The Constitutional Court has adopted streamlined working methods, including case grouping and reliance on precedent, allowing it to process a large volume of constitutional appeals efficiently. Its case-law firmly establishes the State's responsibility for debts arising from final domestic decisions against socially or State-owned companies and

provides compensation for both pecuniary and non-pecuniary damage from budgetary funds. The Constitutional Court has also clarified that prolonged non-enforcement in itself constitutes a violation, irrespective of procedural complexity.

Compensation for non-pecuniary damage has been significantly increased and brought into line with the Court's standards, thereby strengthening the effectiveness of domestic remedies. The authorities have also continued to pursue friendly settlements before the Court as a means of providing timely redress and reducing the number of pending applications. At the same time, a dedicated working group remains engaged in improving the existing legal mechanism, including consideration of a repayment scheme.

Finally, awareness-raising measures have been implemented through continuous training of judges, court staff, and State administration on the Court's case-law, with particular emphasis on the enforcement of final decisions. These combined legislative, judicial, and educational measures demonstrate the authorities' ongoing commitment to preventing similar violations and ensuring effective execution of judgments in the future.

- *Stanimirović v. Serbia*, no. 26088/06 (Enhanced supervision)

Case Description: This group of cases relates to the failure to carry out effective investigations into allegations of ill-treatment by police officers (procedural violations of Article 3), as well as to instances of ill-treatment inflicted by police officers during questioning (a substantive violation of Article 3 in *Zličić* and *Lakatoš and Others*). It further concerns the unfairness of the criminal proceedings stemming from the reliance on confession statements obtained through police brutality (Article 6 in *Lakatoš and Others*).

Individual measures: In response to the Court's findings, the authorities adopted a set of individual measures aimed at bringing the identified violations to an end and providing redress to the applicants. The competent public prosecutors examined whether further investigative steps could be taken in light of Convention standards, but established that fresh criminal investigations were no longer legally possible due to statutory limitation periods. The authorities expressed regret that, under the applicable domestic law, it was not possible to reopen investigations or initiate disciplinary proceedings against the police officers concerned. The authorities further clarified that, at the relevant time, domestic law did not provide for an appeal against decisions rejecting criminal complaints, while a constitutional complaint was available and recognised as an effective remedy by the Court.

With regard to the substantive limb of Article 3, the Court concluded that the applicants had been subjected to ill-treatment during police questioning, in the absence of any plausible alternative explanation provided by the authorities. In response to these findings, the domestic authorities took note of the Court's assessment and examined the available information concerning the applicants' current medical condition. In this respect, and having regard to the considerable lapse of time since the incidents, the authorities established that there is no indication that the applicants continue to suffer any lasting or ongoing medical consequences resulting from the ill-treatment.

Finally, the applicants were awarded just satisfaction in respect of non-pecuniary damage, no claims for pecuniary damage were submitted, and domestic law provided a separate avenue for such claims within a prescribed time-limit. In view of these elements, the authorities consider that the applicants have been adequately redressed for the violations found.

General measures: The authorities remain firmly committed to fully enforcing the Court's judgments and to eradicating ill-treatment and torture by law enforcement officers, in line with Article 3 of the Convention. Significant legislative reforms have strengthened safeguards against ill-treatment, notably through a modernized legal framework governing police conduct, the use of force, and accountability mechanisms. The principle of proportionality and the prohibition of torture and ill-treatment are explicitly enshrined in police legislation, requiring the gradual use of force limited to what is strictly necessary. A comprehensive internal oversight mechanism has been established, obliging police officers to report every use of force and subjecting such incidents to independent assessment by authorized officers or commissions. Unlawful use of coercive measures may result in disciplinary sanctions, including termination of employment, reinforcing accountability within the police service. Further legislative initiatives aim to strengthen criminal-law protection by enhancing sanctions for offences related to coercion of statements and ill-treatment, clarifying their legal structure, and aligning domestic law with international standards. These reforms seek to improve legal certainty, consistency in prosecution, and the deterrent effect of criminal sanctions, while remaining compatible with the national criminal-law system.

Detailed secondary legislation regulates police powers, detention, and the use of coercive measures, introducing robust procedures for assessing legality, proportionality, and necessity. Supervisory mechanisms ensure that evidence is promptly collected, medical documentation secured, and factual circumstances thoroughly established. The authorities have also invested in improving detention conditions and police infrastructure, including the introduction of dedicated interview rooms equipped with audio and video recording systems to reduce the risk of ill-treatment. Preventive measures include enhanced control over confiscated items, improved electronic records, and strengthened internal control structures, including centralized databases for complaints alleging police misconduct. Complaints involving allegations of torture or ill-treatment are automatically transferred to an independent internal control body and, where appropriate, to prosecutorial authorities. Awareness-raising and professional training have been prioritized, with continuous human rights education integrated into police training curricula at all levels.

Specialized training focuses on lawful interrogation techniques, protection of vulnerable persons, procedural safeguards during deprivation of liberty, and zero tolerance for ill-treatment. The authorities have emphasized the importance of public leadership and clear messaging condemning police brutality and combating impunity. Institutional coordination has been reinforced through a dedicated commission responsible for implementing international standards, overseeing police practice, and monitoring compliance with recommendations from oversight bodies. The commission conducts inspections, issues recommendations, contributes to training programs, and supervises the implementation of safeguards related to detention and police conduct. Procedural reforms have also strengthened the independence and effectiveness of criminal investigations into alleged ill-treatment by vesting prosecutors with full authority over investigations and enhancing prosecutorial independence. A specialized methodology for investigating allegations of police ill-treatment has been adopted as a binding framework, ensuring prompt, independent, and effective investigations. This methodology emphasizes prosecutorial leadership, victim participation, proper handling of evidence, timely forensic examinations, and transparency throughout the investigative process. Complementary instructions guide police cooperation with prosecutors and internal control bodies. The authorities consider that the combined effect of legislative reform, institutional strengthening, professional

training, and enhanced oversight provides a coherent and effective response to preventing ill-treatment and ensuring compliance with Article 3 of the Convention.

- *Zorica Jovanović v. Serbia*, no. 21794/08

Case Description: This case concerns a breach of the applicant's right to respect for her family life resulting from the respondent State's prolonged failure to provide reliable and credible information concerning the fate of her son, who was reportedly declared dead three days after his birth in a maternity ward in 1983. The applicant was never given her son's body, nor was she informed of the location where he was allegedly buried. Furthermore, the circumstances of his alleged death were never subjected to an effective investigation or properly entered into official records, amounting to a violation of Article 8 of the Convention. The Court observed that a large number of parents whose newborn children had allegedly died and subsequently "gone missing" in hospital wards between the 1970s and the 1990s had submitted applications to the Serbian Parliament seeking redress. In light of the considerable number of potential applicants, the Court held that the respondent State was required, within one year from the date on which the judgment became final, to adopt all appropriate measures, preferably through the enactment of a *lex specialis*, in order to establish a mechanism capable of providing individual redress to all parents in situations identical or sufficiently similar to that of the applicant. The Court further specified that such a mechanism should operate under the supervision of an independent body endowed with adequate powers, capable of providing credible information regarding the fate of each child and awarding appropriate compensation where warranted.

Individual measures: The Court awarded the applicant just satisfaction in respect of non-pecuniary damage, which was paid within the prescribed timeframe, and the authorities therefore consider that she has been compensated for the damage sustained. As regards measures aimed at establishing the fate of the applicant's child, the authorities note that an effective mechanism has been put in place under the relevant domestic legislation, but that the applicant did not make use of this available avenue. In particular, the applicant did not initiate proceedings before the competent domestic courts within the statutory time-limit. In light of these circumstances, the authorities consider that the applicant has been afforded redress and that no further individual measures are required in the present case.

General measures: In response to the Court's judgment, the authorities adopted a dedicated *lex specialis* establishing a comprehensive mechanism to provide individual redress to parents of babies suspected to have gone missing from maternity wards. The law introduced a two-track fact-finding system, combining expedited non-contentious court proceedings with the work of an independent fact-finding commission. Competence to examine applications was vested in designated higher courts, which conduct proceedings with enhanced investigative powers aimed at establishing the fate of the children. The scope of eligible applicants was broadly defined to include parents, close relatives and individuals suspecting that they themselves might be missing babies, as well as allowing proceedings to be initiated by the Ombudsman.

The judicial proceedings are conducted by specially trained judges and are subject to judicial review, with the possibility of reopening where new evidence emerges. Courts are empowered to investigate facts *ex officio*, summon witnesses and experts, impose coercive measures for non-compliance, and order DNA testing, while ensuring that proceedings are free of court fees and that legal aid is available. The law also authorises courts to award

just satisfaction for non-pecuniary damage, without prejudice to potential claims for pecuniary damage under general legislation. Parallel criminal proceedings are enabled, with courts obliged to notify public prosecutors where grounds for criminal suspicion arise, and prosecutors instructed to re-examine existing and new complaints in a uniform and effective manner.

Significant efforts were undertaken to ensure effective implementation of the mechanism, including the organisation of extensive training programmes for judges and police officers and continuous awareness-raising activities involving parents and civil society. Despite challenges posed by public health circumstances (COVID-19 pandemic), the authorities ensured the practical functioning of the mechanism and maintained ongoing dialogue with international partners. The fact-finding commission was established as an independent body with a majority of members drawn from parents' associations and civil society, vested with broad powers to collect and process information from all relevant public bodies. The commission operates autonomously, adopts its own rules of procedure, and is supported administratively by the Government.

In parallel, steps were taken to strengthen the legislative framework for DNA identification through amendments aimed at creating a specific DNA database dedicated to missing babies, improving accreditation of laboratories, and enhancing data reliability and protection. Pending the adoption of these amendments, existing identification procedures continue to be applied by competent authorities. Current judicial practice shows that courts comprehensively assess medical, civil registry, police and funeral documentation, often identifying serious deficiencies that prevent the establishment of the child's status with certainty. Where the fate of the child cannot be determined, courts have consistently awarded the maximum level of just satisfaction provided by law. Overall, the authorities consider that the adopted measures constitute a comprehensive and Convention-compliant response to the violations identified by the Court.

The Serbian authorities will continue to inform the CM in a timely manner of the results of the general measures taken to execute this judgment.

Please provide information on Serbia's monitoring mechanism regarding outstanding ECtHR judgements.

The practice of the Government Agent and other relevant state authorities in executing judgments and decisions of the Court in relation to the Republic of Serbia is well-established and has been consistently applied. However, it is noted that this practice currently operates without a fully codified framework of clearly prescribed authorizations and procedural rules. In light of this, it is anticipated that a comprehensive legislative regulation will be introduced, clearly defining the position, responsibilities, and competencies of the Government Agent before the Court within the domestic legal system. Such regulation is expected to encompass detailed procedural guidelines for the execution of judgments and decisions of the Court, thereby enhancing legal certainty, transparency, and the efficiency of implementation. This development would further consolidate Serbia's commitment to the effective and timely execution of the Court's decisions, in full accordance with its obligations under the Convention.

- Please inform on Serbia's follow-up to the Court's judgment on the *Kačapor group* case. In autumn 2024 the city of Niš established a scheme to support workers of state/socially-owned companies with the seat in Niš. Please provide an update on the scope of this scheme and how it relates to the envisaged general scheme. In addition, are such schemes envisaged for the benefit of workers of the state/socially-owned companies with their seats on the territory of other cities?

Ministry of Justice

Amendments to the Law on Protection of the Right to Trial within a Reasonable Time

The National Asembly of the Republic of Serbia adopted the amendments to the Law on the Protection of the Right to a Trial within Reasonable Time on 26th October 2023, which entered into force on 4th November 2023. The Law on the Protection of the Right to a Trial within a Reasonable Time was amended in order to ensure the protection of creditors in enforcement proceedings under decisions made against companies with predominant social or state capital, as well as in bankruptcy proceedings in which these companies are bankruptcy debtors. In this regard, and in accordance with the views of the European Court of Human Rights and the recommendations of the Committee of Ministers, appropriate amendments to the Law on the Protection of the Right to a Trial within a Reasonable Time have been adopted, in order to respect the principle of subsidiarity and reduce the number of applications before the European Court of Human Rights relating to the court proceedings in question.

In accordance with the amendments to the Law on the Protection of the Right to a Fair Trial within a Reasonable Time, which transferred jurisdiction in these cases to the Constitutional Court, in 2024, the Constitutional Court upheld constitutional complaints for a total of 3,967 complainants whose right to a fair trial within a reasonable time and property rights in bankruptcy and enforcement proceedings involving debtors of companies with majority state or socially owned capital were violated. Considering the number of individuals for whom constitutional complaints were upheld in this group of cases, it can be said that the established new mechanism is effective.

Amendments to the Law on the Constitutional Court

On October 26th, 2023 the Law on Amendments to the Law on Constitutional Court was adopted by the National Assembly of the Republic of Serbia. By re-prescribing the constitutional appeal as an effective legal remedy, the protection of creditors is ensured in enforcement proceedings that were initiated on the basis of decisions made against companies with predominantly social or state capital, as well as in bankruptcy proceedings where these companies are bankruptcy debtors.

Data for 2025

Total number of decisions received by the Constitutional Court is **1783.**

Total number of submitters of constitutional complaints is **6913**.

Total amount paid for compensation of non-material and material damages is - **2.272.665.030,95** dinars.

For **688** decisions of the Constitutional Court from 2025, the delivery of the necessary documentation for the payment of damages is still awaited, as well as courts' reports, decisions of inheritance, etc.

Around **5593** decisions on the payment of damages have been made based on the Constitutional Court's decisions, with payments in 2025 being made for decisions received in 2024 and earlier years.

4. Judiciary

4.1 Independence and accountability - including follow-up to constitutional amendments (adoption of the implementing judicial laws and related by-laws), the High Judicial and Prosecutorial Council (implementation of the codes of ethics, application of rules for appointments, promotions, update on disciplinary actions) and public comments on on-going court proceedings and on judges and prosecutors

- Could you please provide an update on the elections of the new members of the High Prosecutorial Council (HPC) and the High Judicial Council (HJC), including on the conduct, recording and distribution of the campaigns of the different candidates?

High Prosecutorial Council

Elections for the new members of the Council from the ranks of public prosecutors were held on the 23rd of December 2025 and were carried out in full accordance with the applicable legal framework. No irregularities were reported at any polling station. In addition to having proper election documentation, the independent NGO observers that were present on all polling stations from YUCOM (Lawyers Committee for Human Rights) recorded no irregularities.

On the other hand, although the elections themselves were held without any problems, it can unfortunately be stated that the campaign was not in accordance with preferred practice (a detailed description of which would exceed the scope of the answer).

Certain media houses openly put pressure on the prosecutors, as well as the general public, favoring some candidates over others. Numerous untruths were stated, which on several occasions required official reaction in the form of denials by the Council and individual members of the Council.

In the domain of what falls under the competencies of the Council including procedural actions, there were no irregularities, while in summary it can be stated that this is not the case when it comes to all those other elements of the election process, which are outside the competencies of the Council.

Adding to all this, there were 6 clearly unfounded complaints to the results of the elections filed, which were in no way supported by any evidence. Based on the further development of the situation, it is reasonable to conclude that the purpose of these complaints was clearly an obstruction of the election procedure for the sole purpose of disputing legal and legitimate election results.

Namely, as the Law on the High Prosecutorial Council stipulates that in the event of a complaint by any legally entitled person, including voters themselves, the Council must decide urgently within a short period of only 48 hours. Otherwise, there is a legal presumption that the complaint is well-founded.

The President of the Council did everything within his competences to ensure the holding of a Council session to decide upon these complaints. During this there was an obvious obstruction of the operation of the Council, namely with the unexcused absence of several council members and all with the clear aim of obstructing the election results, so that the complaints would be considered adopted *ex lege*. To combat this obstruction, an electronic session was held, deciding on the complaints, and finally rejecting them in the absence of the requested 8/11 members majority required for their adoption.

All documentation on the above, including all relevant election documents, as well as recordings and records of Council sessions are publicly available.

As of the writing of this report, the fate of the election results remains uncertain as the Council's decisions on the filed complaints have been appealed before the Constitutional Court. The proceedings are still ongoing.

High Judicial Council

In accordance with Article 35 of the Law on the High Judicial Council ("Official Gazette of the Republic of Serbia", No. 10/23) and Article 28 of the Rulebook on the work of the election commission of the High Judicial Council ("Official Gazette of the Republic of Serbia", No. 34/24), the presentation of candidates was organized in the seat of all four courts of appeal, as well as the video recording of the presentation at the headquarters of the Court of Appeal in Belgrade, all in accordance with the technical and financial capabilities of the High Judicial Council.

We emphasize that in this procedure, all candidates were provided with the right to present (from 30 minutes) and the right to video record (from 3 to 4 minutes), under equal conditions.
The video recording of the candidate's presentation is published on the website of the High Judicial Council.

- Please update on the implementation of recording and livestreaming of the sessions of both Councils.

High Prosecutorial Council

Sessions of the Council are livestreamed and recorded and available on the website of the Council.

High Judicial Council

Starting from May 15 2025, based on Article 29 of the Rules of Procedure of the High Judicial Council ("Official Gazette of the Republic of Serbia", No. 110/23 of 8 December 2023), the sessions of the Council are audio-visually recorded.

Audio-visual recording of the session of the Council is posted on the Council's website within 24 hours from the date of the session.

The part of the session open to the public is recorded and the recording is available, whereas the part of the session closed to the public is not recorded.

Audio-visual recordings of the Council's sessions may be viewed on the YouTube channel of the High Judicial Council:

https://www.youtube.com/@Visokisavetsudstva-RS

- Please update on the new Law on Judicial Academy, including how the recommendations of the Venice Commission have been included, and how the independence of the Judicial Academy is safeguarded effectively while respecting the constitutional prerogatives of the High Councils. Please provide an update on the timeline for adoption of the law. We reiterate the European Commission's readiness to be consulted on the final draft prior to adoption (a consultation that is needed in the context of the IBMs).

Ministry of Justice

Minister of Justice established the Working Group for drafting the Law on the Judicial Academy on July 25th, 2024. On September 12th, 2024 the Draft Law was sent to the Venice Commission in order to analyze and discuss it at the plenary session. The public debate on the Draft Law was held in a period from October 1st, 2024 until November 1st, 2024. 4 round tables were organized aiming to discuss the Draft Law on Judicial Academy (October 10th in Nis, October 17th in Kragujevac, October 24th in Novi Sad and October 31st in Belgrade). It is of great importance to stress that representatives of Judges' Association of Serbia, Prosecutors' Association of Serbia, Association of Judges of Misdemeanor Courts of the Republic of Serbia, Association of Judges and Prosecutors of Serbia and Judges' Forum of Serbia were actively included in the Working Group for drafting the Law on Judicial Academy. On December 6th, 2024, the Venice Commission adopted the positive opinion on the Draft Law on the Judicial Academy meaning to support the Ministry of Justice to finalize the Constitutional reforms and to strengthen the capacities of the Judicial Academy. The Draft Law was sent to the European Commission on 16th December 2025. Currently, there is an ongoing discussion regarding the participation of the Minister of Justice within the Management Board of the Judicial Academy. Once we have the standpoint of the EC we will proceed with the necessary activities regarding the adoption which is expected during the 1st quarter 2026. Once the Law is adopted, the Ministry of Justice and Judicial Academy will conduct necessary activities regarding the secondary legislation (by-laws).

- Please provide an update as regards the by-laws to be adopted related to the new Law on Judicial Academy.

Ministry of Justice

Once the Law on the Judicial Academy is adopted, the Ministry of Justice and Judicial Academy will conduct necessary activities regarding the secondary legislation (by-laws).

High Judicial Council

The new Law on the Judicial Academy has not yet entered the parliamentary adoption procedure. At the session held on 9 December 2025, the High Judicial Council gave its opinion on the Draft Law on the Judicial Academy and requested that the Draft Law be withdrawn from the furder procedure. The opinion of the High Judicial Council is that the Draft Law on the Judicial Academy is contrary to the decision of the Constitutional Court No. UZ-497/2011 of 6 February 2014, as it, together with the Draft Law Amending the Law on Judges, prescribes that only candidates who have completed previous training at the Judicial Academy may be appointed to judicial office for the first time.

In the aforementioned decision, the Constitutional Court found that certain provisions of the then applicable Law on the Judicial Academy were unconstitutional and took the position that the legal solutions according to which all persons who did not complete the initial training at the Judicial Academy were, therefore, essentially eliminated from the circle of candidates for the first election as a judge were constitutionally unacceptable.

Pursuant to Article 166, paragraph 2 of the Constitution, decisions of the Constitutional Court are final, generally binding and enforceable, and the Draft Law on the Judicial Academy is directly contrary to the Constitutional Court's decision No. UZ-497/2011 of 6 February 2014.

Certain provisions of the Draft Law on the Judicial Academy are contrary to the Law on the High Judicial Council ("Official Gazette of the Republic of Serbia", No. 10/2023), since Article 10, item 8 of the Draft provides that the Management Board of the Judicial Academy adopt a programme for prior training, upon approval of the High Judicial Council, whereas Article 17, item 15 of the Law on the High Judicial Council prescribes that the Council determines the initial training programme for judge.

The Council points out that the composition of the bodies of the Judicial Academy does not enable its independence, since, pursuant to Article 8, paragraph 2 of the Draft, the minister of justice is a member of the Management Board, and also one member of the Management Board is also appointed by the Government of the Republic of Serbia from the ranks of employees. In addition, the Program Council includes the State Secretary in the Ministry of finance and the State Secretary in the Ministry of justice, who are appointed upon the proposal of the line ministers.

The Draft Law on the Judicial Academy, together with the Draft Law on Amendments to the Law on Judges, unconstitutionally deprives the High Judicial Council of the authority to organize and conduct an examination to determine the expertise and competence of candidates who are elected to a judicial position for the first time, and at the same time limits the Council's electoral powers, as the Council will only be able to elect a judge who has completed previous training at the Judicial Academy. In this way, the entrance exam for enrollment in prior training at the Judicial Academy becomes an election prior to election to a judicial position, which is in contradiction with the constitutional legal powers of the High Judicial Council, which is the only one competent to conduct elections to a judicial position.

The High Judicial Council has never given its consent to amendments to the Law on Judges, but provided only principled support for the adoption of a new Law on the Judicial Academy, in accordance with the guidelines under Chapter 23 and within the context of the international obligations assumed by the Republic of Serbia.

Following the decisions of High Judicial Council the procedure for adoption of these laws has been terminated.

- Please provide an update on the adoption of the MoJ/HJC co-shared by-law on the Courts Rulebook stemming from the implementing laws to the Constitutional Amendments.

Ministry of Justice

When it comes to the outstanding Court Rules of Procedure it is still in the final phase of drafting due to its complexity.

High Judicial Council

The Law on the Organization of Courts (Official Gazette of the Republic of Serbia, No. 10/23) in Article 76, paragraph 2, prescribes that the Court Rules shall be jointly issued by the Minister responsible for Justice and the High Judicial Council. The working group that tasked with drafting of the Court Rules has completed its work, but the Court Rules have not yet been adopted.

- Please provide an update on the state of play of the implementation of all relevant by-laws including on competence and timeline, as well as on the adoption of the outstanding by-laws.

Ministry of Justice

When it comes to the outstanding Court Rules of Procedure it is still in the final phase of drafting due to its complexity.

High Judicial Council

The High Judicial Council has adopted all by-laws provided for in the Law on Judges (Official Gazette of the Republic of Serbia, No. 10/23) and the Law on Organization of Courts (Official Gazette of the Republic of Serbia, No. 10/23), except for the Court Rules of Procedure. The aforementioned acts were adopted during 2023 and 2024 and were published in the Official Gazette of the Republic of Serbia and on the website of the High Judicial Council.

All adopted by-laws of the Council have entered into legal force and are applied in the area they regulate, with the exception of the Rulebook on the Evaluation of the Work of Judges and Court Presidents, which was adopted at the Council session held on 17 April 2024 and published in the Official Gazette of the Republic of Serbia, No. 10/23, the implementation of which has been postponed until 1 January 2026.

The implementation of these Rulebook has been postponed because the introduction of new qualitative criteria for evaluating the work of judges and court presidents and the setting up of the commission for evaluation under the new rules requires the time necessary for the effective implementation of this Rulebook.

The High Judicial Council and the Minister responsible for justice have not yet adopted the Court Rules.

High Prosecutorial Council

Since the adoption of the complete bylaw normative framework in 2024 the Council has been implementing it in practice. This implementation has shown certain shortcomings that the Council plans to rectify in the following months. To this end, the Council has formed a working group in late 2025 in order reevaluate the existing normative framework, pinpointing the weak points and recommending changes to the bylaws if and where needed.

- Please provide an update on the appointment of judges and prosecutors in 2025 including ongoing procedures and constitutional complaints. Please also inform about the background of the current blockage in the process of the HPC to appoint prosecutors.

High Judicial Council

As of 12 January 2026, the total number of judges is 2.671. In 2025, a total of 146 judges were elected. Of that number, 94 judges were elected to the judicial office for the first time, and 52 to the higher-instance court.

In the period January - June 2025, 54 constitutional appeals were submitted to the High Judicial Council by the Constitutional Court. Of the above number, 50 cases on appeals were resolved, i.e. the appeals were dismissed as manifestly unfounded.

In the period July - December 2025, no appeals addressed to the Constitutional Court were submitted to the High Judicial Council for a response.

In the period July - December 2025, the Constitutional Court submitted to the High Judicial Council Decisions dismissing appeals against decisions of the High Judicial Council as manifestly unfounded, and there are 9 of these decisions.

These are appeals filed with the Constitutional Court in 2024 and 2025, and before July 2025. Also, the number of these unresolved appeals is 1.

High Prosecutorial Council

As of the end of 2025 there are 899 public prosecutor and 90 chief public prosecutor positions, including the Supreme Public Prosecutor, in the public prosecution systematization of the Republic of Serbia.

Currently there are 695 public prosecutors and 64 chief public prosecutors performing their function.

During 2025, 59 public prosecutors who were elected during 2024 took office, which number is included in the previously stated 695 public prosecutors who perform the function.

During 2025, 51 public prosecutors were elected, of which none had taken office by the time of the report submission due to the appeal procedure before the Constitutional Court that had not yet been completed.

In 2025, only one Chief Public Prosecutor took office, and he is included in the number of 64 Chief Public Prosecutors who hold office.

During 2025, public calls for 22 Chief Public Prosecutors and 88 Public Prosecutors were annulled and the procedures for these positions must be repeated.

- Please update on the number of vacancies for judges and prosecutors, future competitions and the current challenges regarding filling the vacancies.

High Judicial Council

The number of vacant judicial positions as of January 12, 2026 is 456.

The total number of public competitions published in 2025 is 8. A total of 416 vacant judicial positions were published under these competitions. The total number of candidates registered under the competitions from 2025 is 3,255 as of 18.12.2025, given that the entry of applications under the last competition 103/25 is still ongoing.

The procedure for election of judges is regulated by the Law on Judges (Official Gazette of the Republic of Serbia, No. 10/23) and the Rulebook on the procedure for the election of judges and court presidents (Official Gazette of the Republic of Serbia, No. 34/2024). The selection procedure includes:publishing a public competition for the election of judges, submitting applications within 15 days from the date of publication of the public competition in the "Official Gazette of the Republic of Serbia", organizing and conducting examinations for judges who are elected for the first time, obtaining the necessary data and opinions about the candidates, conducting interviews with all registered candidates and the procedure for evaluating the work of candidates from among judges, when necessary, in accordance with the Rules on the Evaluation of the Work of Judges and Court Presidents ("Official Gazette of the Republic of Serbia" 34/2024). Examinations for judges who are elected for the first time, often due to the large number of candidates, cannot be organized in the premises of the High Judicial Council, because there is not enough space for that, but are organized in the halls of the National Assembly of the Republic of Serbia. Candidates have the right to file an appeal with the Constitutional Court within 15 days from the date of publication of the decision of the High Judicial Council on the election of a judge in the "Official Gazette of the Republic of Serbia". In case an appeal has been filed with the Constitutional Court, the candidate may take the oath, if elected to a judicial position for the first time, and assume office only after the Constitutional Court delivers a decision rejecting the appeal.

Article 59 of the Law on Judges stipulates that the Constitutional Court is obliged to issue a decision on the appeal within 30 days from the date of expiry of the deadline for filing an appeal. In practice, the stated deadline is not respected. We would like to point out that the Constitutional Court was unable to operate for several months at the beginning of 2025 due to problems with the information system.

High Prosecutorial Council

As of the end of 2025 there are 204 vacancies for public prosecutors and 26 vacancies for chief public prosecutors.

There are currently 6 ongoing public competitions, 4 for the election of public prosecutors and 2 for chief public prosecutors.

As the election of 22 Chief Public Prosecutors and 88 Public Prosecutors was annulled in late 2025, due to obstructions of the operation of the Council in the form of boycotting sessions by some members or abstaining from voting on these elections, denying the qualified majority needed. As the election procedures for these positions must be repeated in their entirety, the challenge of filling all vacant positions the Council faces has become significantly more difficult.

- Please provide information on the number and nature of disciplinary measures issued against judges and prosecutors in 2025 and give an update on their enforcement.

High Judicial Council

The Disciplinary prosecutor submitted five proposals to initiate disciplinary proceedings for disciplinary offenses:

-serious disciplinary offense referred to in Article 97, paragraph 2 of the Law on Judges in conjunction to a disciplinary offenses, failure of a judge to request exemption in cases where there are obvious reason for exemption, i.e. exclusion provided for by law referred to in r Article 97, paragraph 1, item 2, and a major violation of the provisions of the Code of Ethics as determined by the Ethics Committee referred to in Article 97, paragraph 1, item 20 of the Law on Judges,

- serious disciplinary offense referred to in Article 97, paragraph 2 of the Law on Judges in conjunction to disciplinary offense, a major violation of the provisions of the Code of Ethics as determined by the Ethics Committee under Article 97, paragraph 1, item 20 of the Law on Judges,

- unjustified failure to notify the president of the court about the case with prolonged proceedings referred to in Article 97, paragraph 1, item 6 of the Law on Judges,

- unjustified failure to notify the president of the court about the case with prolonged proceedings referred to in Article 97, paragraph 1, item 6 of the Law on Judges,

-serious disciplinary offense referred to in Article 97, paragraph 2 of the Law on Judges in conjunction to a disciplinary offense of a major violation of the provisions of the Code of Ethics as determined by the Ethics Committee under Article 97, paragraph 1, item 20 of the Law on Judges.

In 2025, the Disciplinary Commission of the High Judicial Council concluded one case from 2024, as follows:

1. By decision of March 14, 2025, a proposal was adopted to conduct disciplinary proceedings from November 14, 2024 due to the disciplinary offense of Violation of the provision of the Code of Ethics to a greater extent, which was determined by the Ethics Committee under Article 97, paragraph 1, intent 20 of the Law on Judges, and the disciplinary measure of REPRIMAND was imposed.

We would like to note that the process of electing the president and individual members of the Disciplinary Commission is underway.

High Prosecutorial Council

In 2025, the Disciplinary Prosecutor had 166 reports filed against 166 persons, 87 of which were dismissed, 24 cases are still pending, while 50 were resolved in another way.

The Disciplinary Prosecutor has made his recommendation to initiate disciplinary proceedings to the Disciplinary Commission in 5 cases.

The Commission has issued a ban on election to a public prosecutor’s office of a higher level for three years in one case, while the others are still pending.

- Please update on the implementation of the codes of ethics and the plans and timeline for its revision and for the election of the new members for the Board of Ethics.

High Judicial Council

At the session of the High Judicial Council held on October 10, 2024, three members of the Ethics Committee were appointed, starting from October 15, 2024, for a period of five years.

At the session of the High Judicial Council held on December 26, 2024, two members of the Ethics Committee were appointed, starting from December 26, 2024, for a period of five years, so that the Ethics Committee has five members, as prescribed by the Rulebook on the work of the Ethics Committee (Official Gazette of the Republic of Serbia, No. 116/23).

In December 2025, one member of the Ethics Committee submitted a request to terminate his/her function. In the coming period, it is planned to publish a public call for applications for appointment as a member of the Ethics Committee.

Eight sessions were held in 2025 of the Ethics Committee of the High Judicial Council, which reviewed 24 initial acts.

High Prosecutorial Council

In 2025, the Board had a total of 25 cases. In 21 there was no breach of the code of ethics found, 4 cases are still pending.

In this reporting period, 15 petitions were submitted to the Commissioner for Autonomy. In 11 cases no undue influence on the Holders of the Public Prosecutor's Office was found. The 4 cases remaining are pending.

The afore mentioned working group created by the Council in late 2025 will reevaluate the existing bylaw framework, including the Rules of Procedure of the Ethics Committee of the High Prosecutorial Council, pinpointing the weak points and recommend changes to the bylaws where and if needed.

- Please update on the state of play about undue comments on court cases and on members of the judiciary. Please provide an update on the reactions and actions taken by the Councils to protect independence/autonomy including on public outreach. Please also outline how many requests were submitted by judges and prosecutors for protection of undue influence to the respective Councils and whether any awareness raising or training measures were undertaken with regard to undue influence.

High Judicial Council

On July 10, 2025, the High Judicial Council issued a statement reminding that any undue influence on a judge in the performance of judicial function is prohibited, that a judge in trial and decision-making is free to represent his understanding, establish facts and apply the law, and called on all holders of public office to act in public in accordance with the dignity of the function they perform and to maintain trust in state institutions, the media and journalists to truthfully, fully and timely inform citizens about issues of public importance, the citizens to have patience and trust in courts and judges, and the judges to be aware of their specific roles, responsibilities and duties in society.

In second press release dated August 21, 2025, the President of the High Judicial Council reminded all citizens of the Republic of Serbia, as well as the other two branches of government

and the media, that they must respect the independence and autonomy of judges and the judiciary, to enable judges to perform their judicial functions in accordance with the Constitution of the Republic of Serbia, ratified by international treaties, while respecting the Code of Judicial Ethics and awareness of personal responsibility for the peace and security of all citizens of the Republic of Serbia.

- In 2025, four requests for protection from undue influence were submitted. At the session on May 15, 2025, a decision was made on one request received by the Council in 2024. By decision of May 15, 2025, the Council determined that there was undue influence on the work of the Basic and High Courts in Novi Sad. The decision was published on the website of the High Judicial Council. The procedure regarding the remaining requests is ongoing.

High Prosecutorial Council

As stated in the previous reporting period, the Council made 4 decisions on the existence of undue influence based on the recommendations of the Commissioner for Autonomy.

In this reporting period, there was a high number of activities and actions, including various high-ranking officials and media houses, that can be reasonably suspected of constituting undue influence, both on the public prosecutors and on the work of the Council itself.

The largest percentage of these alleged influences are related to the conduct of elections for members of the Council from the ranks of public prosecutors, but there were also those that are not related to the elections, but to the exercise of jurisdiction, the regular conduct of the public prosecution, especially when it comes to Public Prosecutors Office for Organized Crime.

In this reporting period, 15 petitions were submitted to the Commissioner for Autonomy. In 11 cases no undue influence on the Holders of the Public Prosecutor's Office was found. The 4 cases remaining are pending. No further decisions on the existence of undue influence were adopted by the Council yet.

- Are there plans to strengthen/revise the mechanisms of the Councils to react more strongly in cases of undue public comments? Are there preparations to amend the relevant by-law that specifies that the High Prosecutorial Council can only discuss and take a decision on complaints of undue influence in the cases where the Commissioner for Autonomy determines that there possibly has been a case?

High Judicial Council

The High Judicial Council will analyze the provisions of the Rulebook on the protection of judges and courts from undue influence and propose any possible amendments in order to provide effective and efficient reaction in these cases.

High Prosecutorial Council

The aforementioned working group formed by the Council in late 2025 will reevaluate the existing bylaw framework, including the Rules of Procedure of the High Prosecutorial Council regarding undue influence on the work of the public prosecutor and the public prosecutor's office, pinpointing the weak points and recommend changes to the bylaws where needed.

We are left with the problem that, in accordance with its competencies, the Council is unable to deal with. Apart from public condemnation, Council does not have any other mechanisms by which it could influence entities outside the public prosecution in order to stop and prevent undue influence. The introduction of competences that would give additional powers to the Council in this sense would be most welcome, but remains beyond the competence of the Council itself and implies the activity of the National Assembly – amendment of relevant laws.

In the domain of what the competence of the Council is, specifically the Rules of Procedure of the High Prosecutorial Council regarding undue influence on the work of the public prosecutor and the public prosecutor's office that regulate the work of the Commissioner for Autonomy, some members of the Council have publicly indicated the need to make changes in this act that would unequivocally oblige the Commissioner to clarify and explain his position even when he believes that there is no undue influence in the specific case, and not as he has done so far, i.e. to give an explanation only when he believes that undue influence exists.

- Please update on the number of complaints and actions taken by the Government and Parliament in cases of comments which are in contradiction with their code of conduct. How many sanctions have been imposed on public officials and how have these sanctions been enforced?

National Assembly

There were no such cases.

- Two MPs were in May 2025 found to have unduly influenced the prosecutors; what was the National Assembly's reaction in these two cases when it was informed of this matter by the HPC?

National Assembly

Immediately upon receiving the letters submitting decisions establishing the existence of undue external influence on the independence of the prosecution by MPs Vladimir Đukanović and Dragan Đilas, the Speaker of the National Assembly submitted the letters in question to the aforementioned MPs. In addition, the Speaker of the National Assembly, Ms Ana Brnabić, also held verbal consultations with MP Vladimir Đukanović regarding this matter.

- Please update on the results and the impact in reducing undue influence on judges and prosecutors in practice following the reports submitted by the special Council bodies.

High Judicial Council

The judge responsible to act handling request for protection from undue influence shall submit an annual report on his or her work to the High Judicial Council no later than March 1 of the current year for the previous year and whenever the Council so requests.

High Prosecutorial Council

As already stated in the previous question, regarding the climate of the political, legal and democratic culture that is still in the maturing phase in the Republic of Serbia, the effect of

the Council's decisions in this sense, which amount only to public condemnation, is limited to say the least.

- Since many public comments made by public officials contained information from ongoing cases which was not in the public domain, please provide information on any steps taken to increase safeguards against the leakage of information of institutions involved in criminal proceedings and about criminal investigations in this regard. Have there been such steps, what action was taken and are there any ongoing criminal investigations?

Supreme Public Prosecution Office

As already reported, the model for the detection of offenders and the proving of criminal offences related to the disclosure of official secrets ("leaking information to the media") has been developed. This model applies not only to information classified as an official secret, but also to any information with a certain level of confidentiality, as well as to any other information whose disclosure is prohibited by relevant legislation or could endanger or hinder the conduct of criminal proceedings.

Since the Public Prosecutions use ICT in their work, two sub-models were defined, one of which pertains to IT systems.

As an integral part of the model, an Instruction on the obligation to protect and preserve secret and confidential data, and a Statement on keeping secret and confidential data for all employees of the Public Prosecution were created and sent to Public Prosecution for informing their employees and signing of Statement.

Public prosecutors are obligated to inform the Supreme Public Prosecution Office on violations of regulations on the disclosure of information by elected and/or employed persons, as well as on the measures taken with regard to their sanctions.

The implementation of this mechanism is being monitored through established channels

- Could you please provide an update on the state of play of the plans to establish a random system of automatic case allocation in the prosecution service?

Supreme Public Prosecution Office

As already noted, discussions with representatives of the US State Department "INL" program regarding the development of business program for automatic case distribution and the development of a business analysis necessary for the proper functioning of this program were held.

However, representatives of the “INL” program informed the Supreme Public Prosecution that, due to directives from the new presidential administration in the United States, all support programs are currently under review. The prosecution office was not informed about the possibility of developing this software.

The Supreme Public Prosecution has continued activities to obtain financial resources for the development of such computer program.

- Could you please provide an update on the implementation of the case allocation system for judges and in particular for which courts is this not being done automatically based on objective rules and what is the reason for it?

High Judicial Council

According to information available to the High Judicial Council, there is an automatic case allocation system in all courts.

Ministry of Justice

The formula for the distribution of cases according to the criterion of "weight" has been implemented in all basic, higher and commercial courts in the Republic of Serbia.

Additional questions Rule of Law report:

- Have there been any changes with regard to the organisation of the justice system in comparison to last year (number of basic courts, special courts, highest courts and jurisdiction, number of prosecution offices and structure of prosecution service)?

Ministry of Justice

Adoption of the Law on the Seats and Territorial Jurisdictions of Courts and Public Prosecutor's Offices was foreseen in the revised Action Plan, however, it should be noted that this strategic document was revised in July 2020, i.e. before the adoption of the Constitutional Amendments, so at that time it was not yet known what the constitutional solutions would be related to the organization of judicial authorities.

While working on the set of judicial laws, it was concluded that there is no need to change the jurisdiction of courts and public prosecutor's offices, nor to establish new specialized courts and public prosecutor's offices, nor to change the local jurisdiction of judicial authorities, and therefore the Government was of the opinion that it is not necessary to make any interventions in the Law on Seats and Territorial Jurisdictions of Courts and Public Prosecutor's Offices having in mind that it is a law of a technical nature that exclusively regulates the local jurisdiction of courts and public prosecutor's offices and it does not have any relation neither with the Constitutional amendments nor with the adopted set of judicial laws.

Therefore, there was no any changes with regard to the organisation of justice system in comparison to last year.

High Judicial Council

Article 17, point 25 of the Law on the High Judicial Council stipulates that the High Judicial Council gives an opinion on amendments or additions to the existing or adoption of new laws that regulate the position of the judge, the organization and proceedings of the court, as well as other systemic laws that the court applies or is important for the performance of the judicial function.

In accordance with the aforementioned provision, the High Judicial Council shall give its opinion on amendments to the law regarding the organization of the judicial system (number

of basic courts, specialized courts, supreme courts and jurisdiction), upon submission by the Ministry of Justice, as the authorized proposer.

High Prosecutorial Council

The Council has increased the number of public prosecutors in the Higher Public Prosecutor's Office in Kragujevac, Higher Public Prosecutor's Office in Novi Sad, Higher Public Prosecutor's Office in Sombor, Higher Public Prosecutor's office in Subotica and Basic Public Prosecutor's Office in Mladenovac by one each, increasing the total number of public prosecutors by 5 to a total of 899.

No other changes were made to the organization, jurisdiction or number of prosecution offices and structure of the prosecution service.

- Please provide an update in case of new developments with regard to the legal framework on disciplinary proceedings, judicial immunity, and civil/criminal liability of judges and prosecutors, prosecutorial autonomy and the independence of the Bar. Please provide recent statistics on disciplinary procedures.

High Judicial Council

The Disciplinary prosecutor submitted five proposals to initiate disciplinary proceedings for disciplinary offenses:

-serious disciplinary offense refered to in Article 97, paragraph 2 of the Law on Judges in conjunction with disciplinary offenses, failure of a judge to request his exemption in cases in which there are obvious reasons for exemption, i.e. exclusion provided for by law under Article 97, paragraph 1, item 2, and a major violation of the provisions of the Code of Ethics as determined by the Ethics Committee under Article 97, paragraph 1, item 20 of the Law on Judges,

- serious disciplinary offense refered to in Article 97, paragraph 2 of the Law on Judges in conjunction with disciplinary offenses, a major violation of the provisions of the Code of Ethics as determined by the Ethics Committee under Article 97, paragraph 1, item 20 of the Law on Judges,

- unjustified failure to notify the president of the court about the cases which prolonged proceedings refered to in Article 97, paragraph 1, item 6 of the Law on Judges,

-serious disciplinary offense refered to in Article 97, paragraph 2 of the Law on Judges in conjunction with disciplinary offenses, a major violation of the provisions of the Code of Ethics as determined by the Ethics Committee under Article 97, paragraph 1, item 20 of the Law on Judges.

In 2025, the Disciplinary Commission of the High Judicial Council concluded one case from 2024, as:

2. By the decision of March 14, 2025, a proposal was adopted to conduct disciplinary proceedings of November 14, 2024 due to disciplinary offense of Violation of the provisions of the Code of Ethics to a greater extent, which was determined by the Ethics Committee under Article 97, paragraph 1, line 20 of the Law on Judges, and the disciplinary measure of REPRIMAND was imposed.

We note that the procedure for electing the president and individual members of the Disciplinary Commission is underway.

Bar Association of Serbia

Bar Association of Serbia indicates that there have been no recent changes affecting the independence of the Bar or the legal framework regulating disciplinary proceedings for attorneys.

As regards statistics on disciplinary proceedings in 2025, Bar Associations within the Bar Association of Serbia, as the first- instant bodies, received a total of 630 disciplinary reports against attorneys, of which 328 were dismissed, 17 were resolved in another manner (e.g. discontinuation of proceedings), 34 resulted in indictments against attorneys, and the remaining cases are currently pending.
Before the first-instance disciplinary courts, 9 cases are currently pending, while 11 cases have been resolved, of which 4 acquittal and 7 conviction judgments.

Disciplinary Prosecutor of the Bar Association of Serbia, acting as the second-instance body, when deciding on complaints (filed by persons who filed disciplinary reports) against decisions dismissing disciplinary reports, rejected the complaints in 124 cases, annulled the first-instance decisions and returned the cases to the first-instance bodies for reconsideration in 33 cases, dismissed 1 as untimely, assumed prosecution and filed an indictment in 1 case, and has 85 cases currently pending.
Disciplinary Court of the Bar Association of Serbia, acting as the second-instance body, issued 10 judgments rejecting the appeals of accused attorneys and confirming the first-instance decisions, 6 judgments accepting the appeals and annulling the first-instance decisions, 2 judgments dismissing the indictment due to expiration of the disciplinary statute of limitations, and 2 decisions on appeals against decisions regarding procedural costs.

High Prosecutorial Council

Especially regarding the legal framework, the recent announcements of the relevant political actors on the proposed changes to the judicial laws, including those regarding the public prosecution, cause significant concern.
Due to the contradictory statements of high-ranking officials, it is not entirely clear what the mentioned amendments will include. However, it seems that their adoption would represent the practical annulment of the reform process and harmonization with European principles and standards, which was done with the consultation and approval of the Venise Commission i.e. the Constitutional Amendments of 2022 and the set of public prosecution laws in 2023.
As for the bylaws regarding this issue that are withing the competencies of the Council, the afore mentioned working group created by the Council in late 2025 will reevaluate the existing bylaw framework, including the Rules on disciplinary bodies of the High Prosecutorial Council

and disciplinary proceedings, pinpointing the weak points and recommend changes to the bylaws where needed.
In 2025, the Disciplinary Prosecutor had 166 reports filed against 166 persons, 87 of which were dismissed, 24 cases are still pending, while 50 were resolved in another way.
The Disciplinary Prosecutor has made his recommendation to initiate disciplinary proceedings to the Disciplinary Commission in 5 cases.
The Commission has issued a ban on election to a public prosecutor's office of a higher level for three years in one case, while the others are still pending.

- Could you please provide an update on the number of transfers of judges and prosecutors with and without consent? Could you please provide an update on the application of the new procedural safeguards regarding transfer of prosecutors including reasoning of decisions?

High Judicial Council

In 2025, there were no transfers of judges without their consent.

High Prosecutorial Council

There were 2 transfers of public prosecutors with consent by the Council in 2025. The Council voted on these transfers during the second regular session, held on the 7th of May 2025.

- Could you please provide an update on the application of the new procedural safeguards for prosecutors with regard to mandatory instructions? How many complaints have been filed and what was the outcome of these procedures?

High Prosecutorial Council

In this reporting period there were 14 complaints filed, 7 were rejected and 7 were accepted as founded and the mandatory instruction was revoked.

- Please provide an update on physical attacks and/or reputational attacks in the media against justice professionals.

Supreme Public Prosecution Office

During 2025 criminal complaints were filed against 3 persons for physical attacks against justice professionals – against 1 person for criminal act Violent behaviour under Article 344 of the CC against a judges and against 2 persons for criminal act Preventing an Official in Discharge of Duty under Article 322 of the CC against public prosecutor, in relation to performing of their functions. In both cases, investigative actions are underway.
However, at the beginning of December, the car of the public prosecutor of the Basic Public Prosecution was set on fire in front of the building where she lives. There is a reasonable doubt that this act is related to the work performed by the victim.

The perpetrators have been identified and a criminal complaint has been filed against them for the criminal offence of Endangering Public Safety. Proceedings before the public prosecution are ongoing.

High Judicial Council

On July 10, 2025, the High Judicial Council issued a statement reminding that any undue influence on a judge in the performance of judicial function is prohibited, that a judge in trial and decision-making is free to represent his understanding, establish facts and apply the law, and called on all holders of public office to act in public in accordance with the dignity of the function they perform and to maintain trust in state institutions, the media and journalists to truthfully, fully and timely inform citizens about issues of public importance, the citizens to have patience and trust in courts and judges, and the judges to be aware of their specific roles, responsibilities and duties in society.

In second press release dated August 21, 2025, the President of the High Judicial Council reminded all citizens of the Republic of Serbia, as well as the other two branches of government and the media, that they must respect the independence and autonomy of judges and the judiciary, to enable judges to perform their judicial functions in accordance with the Constitution of the Republic of Serbia, ratified by international treaties, while respecting the Code of Judicial Ethics and awareness of personal responsibility for **the peace and security of all citizens of the Republic of Serbia.**

High Prosecutorial Council

As mentioned above, in this reporting period there was a great number of both physical and reputational attacks on public prosecutors and public prosecutors' offices, the most grievous being arson committed against a public prosecutor's car in Subotica and the attack on the building of the Basic Public Prosecutor's Office and Higher Public Prosecutor's Office in Valjevo.

Other incidents include the following: protests outside the Council building during disciplinary proceedings against a public prosecutor; various attempts of obstructing the High Prosecutorial Council Conference, including a bomb threat; reputational attacks by certain media houses on the Supreme Public Prosecutor, chief prosecutors on the basic, higher and appellate levels in Belgrade and Novi Sad, as well as on the President and members of the Council.

Lately, the attacks on the Public Prosecutor's Office for Organized Crime have become more frequent. These attacks seem to be part of a serious defamation campaign, with the goal of undermining ongoing procedures within the competencies of this Public Prosecutor's Office.

4.2. Professionalism, competence and quality - update on judicial training, budgetary planning, implementation of the human resources and the ICT strategies for the judiciary as well as the case management system and the allocation of court cases

- The High Judicial Council has in place a strategy and has improved the use of the information and financial reporting systems for more accurate, reliable and efficient data collection and processing. Please provide an update about the implementation of this strategy.

High Judicial Council

- Please inform about the steps taken so far, as well as the challenges identified, in implementing the ICT and HR strategies. Please update on your plans to integrate both strategies into the new Judicial Development Strategy and to increase the pace of implementation.

Ministry of Justice

The Human Resources Strategy for the Judiciary for the period of 2022-2026 and the accompanying Action Plan are public policy documents that comprehensively address all essential issues raised in relation to human resources in judiciary. The content of the accompanying Action Plan is complex, given that it emphasizes the analysis of the current and future potentially revised legal framework, in relation to the specific labour and legal phases that accompany employment and maintenance of employment relationships in courts and public prosecutors' offices.

The basic elements identified by the Strategy and the accompanying AP are employment (entry into the justice system at the staff level), evaluation or assessment of staff, promotion, postings, as well as their competencies. Each of these elements is actually closely linked to a work cycle within the judicial body and the goal of the series of analyses set out in the AP is to provide a clear overview of the current state of play with conclusions and recommendations for improvement.

The conclusions and recommendations for improvement themselves are those that will be used in the work of the Working Group that will consider specific new solutions regarding the judiciary staff in the future. The main goal of the analyses was to show to what extent civil servants, as well as court-organizational regulations, respect the differences that distinguish judicial and prosecutorial staff from other civil servants.

The Ministry of Justice, as the leading body in the implementation of these documents, simplified the implementation of the Strategy and the AP, which is reflected in the unification of a series of assigned analyses. All issues are interwoven, all those issues that were specifically singled out, which was, as it has become clear from this perspective, completely unjustified, for what reason, with project support through two complex analyses, a series of individual ones were consumed. All issues of the work cycle are in a cause-and-effect relationship and it is pointless to separate them. In this way, the shortcomings of the document itself, such as the AP in question, were also corrected. It should be borne in mind that the Human Resources Strategy and the accompanying AP, although extremely necessary, came at the time of key activities that Serbia was carrying out in connection with the implementation of the Constitutional Amendments and the revision, or rather, the drafting and adoption of completely new judicial and organizational regulations. These activities were naturally the first in line for the implementation, which is why the implementation of the Human Resources Strategy should not be viewed through the lens of a delay, but through a logical sequence of activities that followed after the demanding and most extensive constitutional, and subsequently legal, intervention.

All individually listed activities, namely those designated under numbers 1.1, 1.1.2, 1.2.1, 1.2.2, 2.1.1, 2.2.1, 2.3.1 as well as 3.1.1, therefore those that are based on an examination of the current civil service system, are a unified development of the EU Project implemented by the Council of Europe under the names:

1) Analysis of the legal employment status of staff that addresses issues of titles, skills, professional and other qualifications, career development, financial position, assessment, training and the system of entering the profession;

2) Analysis - report on the effectiveness of the existing human resources planning system in the judiciary (which is the umbrella activity and also consumes activity 3.1.1.)

In addition to stated above, the Minister of Justice has established a Working Group for drafting the Law on Judicial Administration. The adoption of this Law is the most important activity prescribed by the HR Strategy in Judiciary and its adoption is expected during 2026.

The results from the implementation of the HR Strategy in judiciary, i.e. findings from the above-mentioned analysis' as well as the provisions from the new Law on Judicial Administration will jointly provide a basis for the definition of new activities in the future strategic document that will cover the goals and measures related to the Serbian judiciary and also this specific field of human resources. Moreover, the Ministry of Justice will, on the basis of the current state of play in the field of ICT, as well as the requirements coming from the relevant IBMs within the Chapter 23, develop the set of measures and concrete activities together with another line institutions that will be included in the next strategic document

- Please provide an update on the preparation of the new Judicial Development Strategy. What is the timeline for adoption and implementation?

Ministry of Justice

As agreed with the European Commission and on the basis of the exchanged documents related to the implementation of the IBMs within the Chapter 23 the Ministry of Justice will initiate a process for development of the new strategic document where all relevant activities needed for the successful implementation of IBMs within the Chapter 23 will be developed and included. In that way we will, jointly with the European Commission, develop a new fresh overview of all work needed to be conducted by Serbian institutions in order for getting the IBAR. In this respect, and since the judiciary represents one out of three subchapters under the Chapter 23, the Ministry of Justice will also use this document, once prepared, to include all the measures into the new Judicial Development Strategy. The same is when it comes to the HR component, i.e. the results from the implementation of the HR Strategy in judiciary, i.e. findings from the above-mentioned analysis' as well as the provisions from the new Law on Judicial Administration will jointly provide a basis for the definition of new activities in the future. Finally, as for the ICT component, the Ministry of Justice will, on the basis of the current state of play in the field of ICT, as well as the requirements coming from the relevant IBMs within the Chapter 23, develop the set of measures and concrete activities together with another line institutions that will be included in the next strategic document.

On the basis of previously stated, in the first half of 2026 the Ministry of Justice will be conducting series of activities aiming to conduct all necessary pre-requirements for creating the clear basis for the work of the Working Group in developing the new Judicial Development Strategy for which we believe will be adopted in the second half of 2026.

- In previous JLS subcommittees, the European Commission had invited Serbia to improve the quality of training, in particular by introducing a system of quality control, and asked

whether there were plans to further promote the subjects of EU law, rule of law, judgecraft and judicial ethics in the curriculum for initial and continuing judicial training in Serbia. Please provide updates in this regard.

Judicial Academy

Judicial Academy of the Republic of Serbia is planning educational activities and quality control based on all phases of the training cycle.

Judicial Academy is focused both on internal and external QA process and activities. Internal QA is focused on implementation of standardized processes, and conducting regular internal audits (covered by Annual plans and procedures). External QA is ensured through continuous cooperation with the working groups of the Program Council and the Management Board.

QA process is ensured trough monitoring and analysing of key performance indicators defined on the basis of job analysis and competency development-based models of judiciary. Key performance indicators for Quality assurance of trainings are: Training Attendance Rate, Training Completion Rate, Post-training Assessment Results, Learner Satisfaction Rate, Learner Retention rate, Job Performance Impact, results of focus groups activities.

Training Needs Analysis – Sector for Research and Improvement of Education which consists of 4 andragogists conducts and designs the Training Needs Analysis and the methodology, analytic tools and instruments. Judicial Academy conducts an annual analysis of the training needs of judges, prosecutors and judicial/prosecutorial assistants and other staff. The quality control indicators used for formulation of questions in the questionnaire, which is distributed to all courts and public prosecutor's offices in Serbia, were evaluation of the quality of the training programmes, the evaluation of training needs through the identification of topics and practical questions/problems, the evaluation of the adequacy of the working methodology, the evaluation of the development of digital skills and the sensitivity to work in a virtual environment. Part of the analysis is a descriptive analysis of international, EU acquis and national legal regulations especially the strategic documents related to the accession, which directly influence the process of development of training programme. The result of this analysis is base for annual training programmes (continuous and initial training). Judicial Academy also conducts an analysis of the specific training needs in order to design training programmes that are adapted to the previous knowledge and experience of the specific target group for which it is intended. Standardized questionnaires and focus groups are used to conduct the analysis.

Moreover, since Judicial Academy has introduced LMS Platform, the quality control mechanisms are also applied in the virtual space.

Selection of Methodology - Judicial Academy selects the methodology based on the results of the TNA, more specifically taking into account the satisfaction, experience of the participants, and level of interactivity of selected methods, as well as the content of the training programme and the objectives and outcomes of learning process. Quality control indicators are evaluation and monitoring of training process. In the following period Academy has more actively implemented e-learning teaching methodology with specific focus on sensitization process of all learning participants in virtual environment.

Training design and development – The development of the training programme is based on the results of TNA, as well as on the implementation of new legal regulations

and national and international court practice. In the process are included trainers, subject matter experts in a particular field (professors, representatives of professions) and andragogists. Quality control is conducted through TNA, evaluation of short-term (satisfaction of participants), medium-term (retention of knowledge and self-assessment of applicability in daily work) and long-term (changes in quality of work after at least 6 months of training measured when is possible due to its complexity) training effects.

Appointment and training of trainers/mentors - Trainers and mentors are selected by the members of the Program Council of the Judicial Academy. Following the invitation letter, candidates who meet the criteria set by the Program Council and who pass mandatory training are selected. The final selection of the trainer is made after the training has been carried out and the development of the didactical competencies has been verified. The procedure for selecting a mentor for initial training is the same. Quality control indicators are evaluation questionnaires, monitoring reports and the results of TNA, while quality control of mentor is carried out through evaluations but also trough monitoring of the quality and development of initial training beneficiaries.

The introduction of the Academy's LMS platform in July 2023 enabled more frequent use of the pre- and post-testing instrument, which proved to be very useful. Namely, prior testing provides lecturers with an insight into the level of knowledge of upcoming participants and thus enables them to prepare an adequate training program. In combination with post-testing, the level of knowledge gained during the training can be measured, which also contributes to measuring the quality of the training itself. Moreover, we will work on further development of learning analytic tools. We are currently working on development and implementation of the online training programme in hybrid, synchronous and an asynchronous format. Currently, the following subject matter is available on the LMS platform: EU Law, Human Rights, Civil Law, Criminal Law and Commercial Law.

European Union Law

When it comes to the education on EU law, the Academy puts a great effort to develop a lot of important activities from 2023, in close cooperation and partnership with the European Judicial Training Network (EJTN), Academy of European Law (ERA), European Institute of Public Administration (EIPA) and EU projects.

European Judicial Training Network (EJTN)

Judicial Academy has been successfully cooperating with the European Judicial Training Network (EJTN) for many years. Based on the EU Law Training Needs Analysis conducted in 2023, it is planned that the Judicial Academy, in cooperation with the European Judicial Training Network (EJTN), within the framework of the "Western Balkans II" project, to organize 5 seminars (training of trainers) that will cover all areas of European Union law. The seminars have been designed to respond to the needs of domestic judges and public prosecutors and to give the wide overview of the EU law in all its important areas, always in the context of the legal system of the Republic of Serbia. The first three trainings for lecturers and experts in the subject area were organized in 2024 in the area of criminal, civil and commercial law of the European Union in the context of the legal system of the Republic of Serbia. The remaining two trainings for lecturers and experts in the subject area were organized in

2025 in the area of EU administrative law and EU charter of fundamental rights in the context of the legal system of the Republic of Serbia.

Moreover, 19 participants (public prosecutors, prosecutorial assistants and prosecutorial associates), attended a webinar on the topic:''International cooperation in criminal matters''.

Judicial Academy of the Republic of Serbia, as an observer country, had one team as a representative at the THEMIS 2025 competition this year.

The team from Belgrade, beneficiaries of the initial training of the XII generation, led by their mentor, competed in the D semi-final group: Judicial ethics and professional conduct, in June 2025 in Vilnius. In competition with eight teams of Judicial Academies from the European Union, the Serbian team was praised for the choice and relevance of the topic and the quality of the methodological treatment and analysis. The work of the Serbian team was declared the two best papers in the semi-final group and will be published in the annual journal of the European Judicial Training Network THEMIS Annual Journal.

Academy of European Law (ERA)

The focus of Judicial Academy during 2025 was to improve the curriculum and increase the scope of training in the field of European Union law, in order to further strengthen training in the field of EU law, as well as to improve the knowledge of domestic legal experts in this field, Judicial Academy maintains close ties with the Academy of European Law (ERA). The Republic of Serbia became a member of the Academy of European Law in June 2024.

In 2025, the Academy of European Law (ERA), has awarded 25 online scholarships for domestic judges and public prosecutors for participation in seminars in the field of asylum law, contract law, criminal law, family law and human rights.

Also, 11 scholarships were awarded for face-to-face participation in the seminars in the field of asylum law, contract law, criminal law, family law and human rights.

Judicial Academy of the Republic of Serbia had the opportunity this year to host a two-day international seminar for judicial office holders, which Judicial Academy organized in cooperation with the Academy of European Law on the topic: "EU Law in the Field of Gender Equality" on October 27-28, 2025 in Belgrade. The seminar brought together 49 participants: judges and public prosecutors from all over Europe. The aim of this international seminar was to provide participants with an overview of EU legislation in the field of gender equality, as interpreted by the Court of Justice of the European Union in its extensive case law on this topic.

Moreover, Judicial Academy in cooperation with the Academy of European Law (ERA), organized a one-day seminar on October 29, 2025 in Belgrade on the topic: "Judicial Decision-Making, Mediation, Arbitration". The seminar brought together 23 participants (judges of basic courts).

Judicial Academy, in cooperation with the Academy of European Law (ERA) and the Serbian Bar Association, organized a one-day seminar on November 5, 2025 in Belgrade on the topic: "Personal Data Protection in the European Union". The seminar brought together 25 participants (basic court judges and lawyers).

European Institute of Public Administration in Luxembourg (EIPA)

Judicial Academy and the European Institute of Public Administration have a cooperation that lasts for more than a decade and we can say that together we have established a good foundation in training on European Union Law, especially through the training of young professionals, beneficiaries of the initial training of the Judicial Academy.

In 2025, Judicial Academy, in cooperation with the European Institute of Public Administration (EIPA) from Luxembourg, organized a two-day online seminar on the topic "The role of the national judge in the European judicial space; the Judiciary and the enforcement of EU law", for the beneficiaries of the initial training of the Judicial Academy.

Also, on the LMS platform there is an online training on the topic: ''Introduction into EU Law.''

In 2025, the European Institute of Public Administration (EIPA) awarded 7 scholarships for domestic judges and public prosecutors to attend training courses in the fields of environmental law, civil law, criminal law and human rights (face-to-face and online).

Judicial Academy, in cooperation with the European Institute for Public Administration (EIPA) from Luxembourg, organized a two-day online seminar on the topic "General Data Protection for Judges and Public Prosecutors" on September 16-17, 2025, for judges and public prosecutors of the Republic of Serbia. The seminar was also organized for judges and public prosecutors of North Macedonia.

Rule of Law

When it comes to the education on rule of law, the Academy puts a great effort to develop a lot of important activities, in close cooperation and partnership with the Office of the Council of Europe, and therefore, Judicial Academy has conducted the following activities in 2025:

Judicial Academy, in cooperation with the Office of the Council of Europe, implemented two two-day workshops on the topic: ''Implementation of Articles 3, 6, 8 and 10 of the European Convention on Human Rights and Fundamental Freedoms'' for beneficiaries of the initial training of the Judicial Academy.

Moreover, Judicial Academy has implemented four one-day seminars on the topic: ''Article 5-Right to Liberty and Security of Person'' for judges and beneficiaries of the initial training of the Judicial Academy.

Furthermore, Judicial Academy has organized 8 one-day trainings on the topic: ''International legal aid in civil matters and family law disputes with an international element.''

- Please provide an update on the measures of the Constitutional Court to ensure easier access to the courts practice database of both domestic and European Court of Human Rights judgments.

Constitutional Court

On the website of the Constitutional Court, the Database of Judicial Practice of the Constitutional Court is available to the public.

- With regard to the recommendations from the (two) finalised functional reviews of the World Bank, could you please provide the assessment of which recommendations were implemented, and which were not implemented, including the reasons for this?

Ministry of Justice

The USAID Rule of Law Project prepared the Analysis of the Implementation of the National Judicial Reform Strategy for the period 2013-2018 which is designed to contribute to a better understanding of the results of the reform process and to indicate possible directions for future strategic activities in the field of judicial reform. The analysis is available at: https://www.rolps.org/vesti/analiza-sprovodenja-nacionalne-strategije-reforme-pravosuda-2013-2018. Furthermore, after the adoption of the Judicial Development Strategy, the World Bank finalized the Functional Review of Work of Judiciary and submitted it to the Ministry of Justice. The Ministry of Justice is in the process of agreeing with the World Bank team in Belgrade regarding the support of the World Bank in reviewing the fulfilment of the World Bank's recommendations from both functional analyses. A vast number of recommendations were fulfilled through the adoption of the Constitutional Amendments and the set of judicial laws. Some of them will be implemented through the adoption of the necessary by-laws, and some were implemented through the development of the ICT solutions in the judiciary. The plan is to work with the World Bank team on the development of a so-called "living document" so that the implementation of the World Bank's recommendations can be continuously monitored. The Ministry of Justice will regularly inform the European Commission on further steps in this matter. In January 2025 a meeting was held between the representatives of the Ministry of Justice and representatives of the World Bank regarding fulfilment of the World Bank's recommendations from both functional analyses. It was agreed that most of the recommendations have been fulfilled. The Ministry of Justice will, during the first half of 2026, work on the assessment of the implementation of the WB recommendations

- Please provide information on how you are planning to address the recommendations from the 2024 World Bank rapid needs assessment of the commercial courts, specifically with regard to the uneven workload among judges (varying from the lowest average caseload per judge of 292 to 783 cases per year, respectively), outdated infrastructure and with regard to enhancing transparency and accessibility in legal proceedings.

Ministry of Justice

It is planned that during 2026 the amendments of the Civil Procedure Code will be adopted which amendments will target the question efficiency, transparency and accessibility in legal proceedings.

- Please provide an update on the current expenses of the courts for the last three years and the budget for the High Judicial Council, i.e. the budget falling under its competence, (including the original amount of the proposal by the HJC to Ministry of Finance). Please also provide a review of the expenses for court staff, maintenance of equipment and courthouses, expenses for investments and capital investments in courts, organisation and development of the judicial IT system, which fall under the MoJ. Are there foreseen consultations with the Ministry of Finance on the budget proposal of the HJC as foreseen in the Law on the HJC?

Ministry of Justice

Please find information on the Annual Public Budget Allocated for Court Operations in the Annex to a document.

The Ministry of Justice submits the Financial Plan Proposal to the Ministry of Finance, which can fully approve, reject or partially approve the Financial Plan Proposal of the Ministry of Justice.

Financial resources

Law on the Organization of Courts defines proposal and execution of budget funds in Article 87.

Article 87

"The scope and structure of budget funds for the work of the courts are proposed by the High Judicial Council and the Ministry responsible for the judiciary.

The High Judicial Council proposes the scope and structure of the budget funds necessary for the current expenses of the courts, except for the expenses for court personnel, in accordance with the Law on the High Judicial Council and distributes these funds to the courts.

The Ministry responsible for justice proposes the scope and structure of budget funds necessary for current expenditures for court personnel, maintenance of court equipment and facilities, expenditures for investment and capital investments for courts, arrangement and development of the judicial information system, and distributes these funds."

Law on Public Prosecution defines proposal and execution of budget funds in Article 142.

Article 142

"The scope and structure of budget resources for the work of the public prosecution are proposed by the High Prosecutorial Council and the Ministry responsible for justice.

The High Prosecutorial Council proposes the scope and structure of budget funds necessary for the current expenses of the Public Prosecutor's Office, except for staff expenses in the Public Prosecutor's Office, in accordance with the Law on the High Prosecutorial Council and distributes these funds to public prosecutors' offices.

The Ministry responsible for justice proposes the scope and structure of budget funds necessary for current expenditures for personnel in the public prosecution, maintenance of equipment and facilities of public prosecutions, expenditures for investment and capital investments for public

prosecutions, arrangement and development of the judicial information system and distributes these funds."

Total approved funds for 2025 under the jurisdiction of the Ministry of Justice for courts is 18.326.963.000 RSD and for public prosecutions is 3.515.735.000,00 RSD.

Material resources

In order to improve accommodation conditions and create the necessary and modern technical conditions for the work of judicial bodies, the Ministry of Justice has continuously invested, both in the reconstruction and adaptation of existing facilities of judicial bodies, and in the construction of completely new facilities, designed in accordance with the needs of judicial bodies according to the most modern criteria for that type of facility, as well as in equipping them with new office furniture and necessary equipment (computer, security, communication, etc.).

Based on requests submitted by judicial bodies, monitoring and comparison of existing equipment, the necessary computer, security, office and other equipment was purchased in order to improve technical working conditions.

The implementation of the modernization of computer systems and equipment of judicial bodies was continuously monitored, and in this regard, the necessary equipment (item 512 - Machinery and equipment) was purchased in the facilities of courts and prosecutor's offices.

• January 1, 2025 – December 31, 2025

During the specified period, the following funds were transferred to the judicial authorities in accordance with the requirements and needs for the following budget classification:

425 – ongoing maintenance of facilities and equipment.....RSD 102.599.564,00
511 – buildings and construction facilities ..... RSD 16.191.716,00
512 – machines and equipment ..... RSD 74.520.989,00

In addition, the following capital projects were implemented:

- PROJECT 5006 – PROCUREMENT OF NECESSARY EQUIPMENT FOR THE FUNCTIONING OF JUDICIAL AUTHORITIES

Within this project, various procurements related to computer equipment are planned in order to improve and digitize the judicial system (a detailed report is available in the ICT group), as well as to facilitate the archiving process and the procurement of necessary furniture for the facilities of judicial authorities. In addition to the above, within the framework of this project, the necessary office furniture, security equipment (Explosive Detection Portals and scanners), archive shelves and racks and other equipment for the needs of judicial authorities were purchased.

- PROJECT 5010 – IMPROVEMENT OF ACCOMMODATION AND TECHNICAL WORKING CONDITIONS OF JUDICIAL AUTHORITIES

Within the framework of this project, during 2025, the following works were carried out:

1. The reconstruction and adaptation of the existing building of the Basic Court in Ub (gross area of 1815m2) was completed. The building was connected to the electricity distribution system (the Electricity Supply Agreement was concluded), and the Republic of Serbia was registered in the Real Estate Cadastre of the Municipality of Ub;
- The procurement of necessary equipment (furniture, computers, security equipment, etc.) was also completed and the facility was put into use.
2. Construction of a new building for judicial authorities in Novi Sad - with the aim of creating adequate accommodation and technical conditions for the work of judicial authorities in Novi Sad, and within the framework of the IPA 2017 Program, a project to construct a new building for judicial authorities was implemented, at ul. Stražilovska (on cadastral plot 7962 K.O. N.Sad) in Novi Sad, which is intended to accommodate four institutions - the Higher and Basic Public Prosecutor's Offices and the criminal departments of the Higher and Basic Courts in Novi Sad. The building has 2 floors (2Po+Su+Pr+6) - two basement floors, basement, ground floor and six floors, total gross area - Pbruto = 10,578.74m2
The preparation of technical documentation and the execution of works were financed from EU funds, while the Ministry financed the interior decoration and the purchase of office furniture, as well as the purchase of necessary equipment (computer, security and other equipment necessary for the functioning of the building) from its own funds.
The building is connected to the EDB system and an Occupancy Permit has been obtained. The completion of this facility will provide adequate conditions for the work of special departments, as well as the prosecutor's office dealing with organized crime cases.
3. The preparation of technical documentation (Execution Project - PZI) for the work on replacing the facade joinery and reconstructing the facade of the judicial authorities building in Novi Sad has been completed. (The start of work is planned in 2026)
4. The 1st phase of work on the exterior decoration of the judicial authorities in Niš - the former "Filip Kljajić" barracks has been completed. (Parking, surrounding paths, lighting of the facility, fencing, etc.) The continuation of work is planned for 2026.

TABLE OF PROJECT IMPLEMENTATION DURING 2025.

project	title	Budget classification	2025. total
5006	PROCUREMENT OF NECESSARY EQUIPMENT FOR THE FUNCTIONING OF JUDICIAL AUTHORITIES	512	176.218.000,00
5010	IMPROVEMENT OF ACCOMMODATION AND TECHNICAL WORKING	511	143.830.290,00

	CONDITIONS OF JIDICIAL AUTHORITIES		
total		RSD	320.047.410,00

High Judicial Council

Through the project EU for Serbia – Support to the High Judicial Council, funded by the European Union and GIZ (Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH), the High Judicial Council has made progress in the field of business processes reflected in the establishment of an information system for monitoring the work of courts – [*Ser.*] IS PRS.

This solution covers all the phases of data collection from various sources, processing, decision-making at the HJC. Furthermore, the information system has enabled the automated flow of documents and the exchange of data between organizational units of the HJC, as well as the exchange of information with the courts and the Ministry of Justice in line with the relevant business processes.

Moreover, the HJC plays a significant role in the preparation and monitoring of the execution of the budget for the competences pertaining to the Council (salaries of judicial office holders, current expenditures). Given the nature of the programme budget, data from the registers/records of judges are used in the planning of budget appropriations. The judicial budget is divided into the part falling within the competence of the HJC and the part falling within the competence of the Ministry of Justice, but the procedures used in planning and monitoring the execution are very similar in the HJC and the Ministry of Justice, while the courts prepare budget execution reports for the HJC and the Ministry in the same manner according to the division of competences and budgets, which has become possible with the IS PRS. The implementation of the IS PRS is aimed at strengthening the capacities of the HJC for the evaluation and career development of judges, strengthening their capacities to manage disciplinary proceedings, activities related to the Code of Ethics, as well as improving relations with civil society.

The Information System for Monitoring the Work of Courts – IS PRS is a web-oriented application, and the application can be accessed by users via the Internet from the public authorities' network domain. The main users of the information system are employees of the HJC and the courts who use in their daily work the functionalities that provide automation and software support for performing activities in the process of advertising vacancies and electing judges, HR functions and the updating of Personal Files, as well as activities in the field of monitoring the budget execution by both the High Judicial Council and the Ministry of Justice. The application has been implemented by using modern technologies for software analysis and development, it implies a strictly controlled access, traceability of the data flow by recording data of any kind through files, user-oriented reporting by means of a report generator, and high scalability so that changes that occur during exploitation can be quickly and easily implemented either by the User or by the Vendor.

Since 1 January 2021, the Financial Management Module has been in the production environment at the HJC and the courts (in line with the requests of the Ministry of Justice,

public prosecutor's offices are also connected), while the modules Database of Personal Files of Judges and Civil Servants and General Service Employees at the HJC and Courts (*Ser.* BLL), Advertisements for the election of judges and court presidents at the HJC, the HR function at the HJC and part of the HR in the courts (records necessary for data in the BLL), Records of complaints and disciplinary decisions have been in the production environment since 1 September 2021. The reason for the later production was the complex preparation of data for migration from the existing databases of personal files, as well as the broadening of the scope of the required reports and records by the Users at the HJC, created at the stage that followed the adoption of the specification of the request.

The module for Advertisements for the election of judges and court presidents and records in the BLL has provided a high degree of automation in the processes of recording advertisements, submitting applications, processing applications, preparing and recording the necessary data in the election process, as well as the preparation of the sessions of the Commission for the selection and records of selected candidates. The database of personal files refers to records in accordance with the Law on Judges and the Law on the Organization of Courts, while the process of preparing complex data sets on candidates and the preparation of tests take place through automated and controlled processes, thus saving a lot of time and reducing the possibility of errors in the preparation of reports. In keeping with the 2023 Constitutional Amendments, changes have been implemented in the reports and personal file records. Moreover, the records on appeals against the HJC Decisions are maintained through the IS PRS, where data on appeals and outcomes of appeals are recorded, which relate to the elected candidates for judges and presidents of the courts, which candidates or possibly third parties filed against the Decisions of the HJC on the selection of certain candidates, by a particular application and an Advertisement. Supplements and changes to the functionality in the module Human Resources Management and the Personal File Database, as an upgrade for the business needs of the Administrative Court aimed at more efficiently monitoring personnel records and the movement of court staff, were implemented in 2023.

Planned upgrades

1. Module Personal File Database - Human Resource Management in all courts. Upgrading the existing information system IS PRS in order to enable full access to all HR functionalities that are currently in the IS PRS production environment, by implementing additional functionalities for all courts (following the model of the upgrade for the Administrative Court).
    a. Records of overtime and standby duty hours – entries made by the human resources service, approved by superiors, full calculation of working hours (prepared for inputting into the information system of the Ministry of Finance called ISKRA (hereinafter: ISKRA IS).
    b. Exchange of data with registers at the Ministry of Justice that have the same or similar set of employee data to avoid multiple entries in the courts.
    c. Personnel data for inputting into the ISKRA IS - personal data from the IS PRS adapted for inputting into the ISKRA Ministry of Finance information system (full records of working hours, changes in coefficients, etc.).

d. Electronic files by employee – all electronic documents produced in the IS PRS or uploaded (scanned documents) are organized by employee and can be easily searched, updated, and changed.

The Financial Management module, which monitors budget execution, has enabled full electronic communication between Users in the courts and the HJC through the IS PRS, related to the sending of all requests in these processes. It has also enabled the uniformity of the process and communication with the courts and, above all, facilitated the work of the courts when it comes to reporting and sending requests. Considering that the judicial budget is divided between the HJC and the Ministry of Justice, the users of the financial module are also employees of the Ministry of Justice - Division of Budget and Analytics, and in addition to communication with the courts, the exchange of documents with prosecutor's offices has also been implemented. Both the HJC and the MoJ have their own sets of generated documents and reports that they use to directly contact the Treasury through electronic files and communicate with applications outside the MoJ. In 2024, the module Budget Planning and Allocation, Consolidated Collection and Processing of the Data Necessary for the Preparation of the Plan and Budget falling within the competence of the HJC, and the preparation of the Budget Allocations for Courts, was established. In the previous period, there was an application entitled BPMIS, but it is no longer in use, which resulted in difficulties in data collection – financial plans of courts and subsequent consolidation and processing of planned funds. With the introduction of this module, a strong impact of the human factor on the speed and accuracy of reporting has been avoided and minimized by automation of the data collection and processing through the IS PRS. The setting of calculation parameters in the codebooks has enabled Users to manage business processes bearing in mind the variability of the data. The application enables an analysis of needs and allocations as well as the generation of electronic files for uploading into the Treasury system.

Planned upgrades

Module - Budget Planning for the Needs of the Ministry of Justice, should enable the following:

a. Collection of data by the courts

b. Consolidation – creation of summary documents of the Plan

c. Allocation proposal — allocation

d. Reporting

More than 250 supporting documents, generated templates, reports and overviews have been implemented in the IS PRS, which are used in daily work activities. The number of users is over 800 and they have been assigned one or more from among 20 roles.

An overview of the budgets for the past three years is attached, namely:

- Draft Budget of the High Judicial Council
- Budget approved by the Law on the Budget
- Supplementary Budget

- Consultations on the Draft Budget were held with representatives of the Ministry of Finance, in accordance with the Law on the High Judicial Council and the Rulebook on the Work of the Budget Committee.

- Bonuses, benefits, and awards for judges are not provided for by the Law on the Budget of the Republic of Serbia, except for jubilee awards.

- Please update on the steps taken to enable the case management systems (CMS) for courts, prosecutions' offices and prisons and their respective foreseen timelines for operationalisation. With regard to the CMS for the judiciary, what steps have been taken since the last JLS subcommittee to explore alternative options for the procurement of the software component? What is the state of play of the implementation of the new CMS for prosecution offices, which was aimed to be completed in 2025? Which steps are outstanding to operationalise the uniform and centralised CMS that interlinks cases across Serbian courts and prosecution offices?

Ministry of Justice

The implementation of a fully centralised case management system (CMS) has not been established. Instead, separate CMS solutions are in place for judicial bodies with different jurisdictions. These systems are subject to regular annual maintenance and continuous upgrades, in accordance with user requirements and amendments to the legal framework.

Supreme Public Prosecution Office

In 2025, the final phase of the implementation of the upgraded Case Management Programme in Public Prosecution Offices (SAPO) was initiated. To date, following the completion of the relevant trainings, the program has been implemented in a total of ten public prosecution offices. Staff of an additional three public prosecution offices have completed the training; however, the CMS is not yet operational in these offices due to issues arising from the data migration from the pilot SAPO software which is in use since 2013.

Addressing of the identified shortcomings is underway and the re-testing of the migrated data is scheduled for January 2026.

Furthermore, due to significant changes in the program, re-testing of the reporting tools is necessary. Preparations for the re-testing are currently underway.

- There is no automatic random allocation of cases in place in the prosecutors' offices. This was planned to be supported by USAID. Are there plans for it to be procured from the MoJ budget and if so, when? Will it be included as an additional functionality of the SAPO?

Ministry of Justice

During 2025, the final phase of the implementation of the new version of the case management system for public prosecutor's offices (SAPO) was initiated. Following the completion of user

training, the system has been deployed in a total of ten public prosecutor's offices, including those in Sremska Mitrovica, Ruma, Stara Pazova, Šid, Kragujevac, Aranđelovac and Aleksinac. Further implementation in the remaining prosecutor's offices is expected upon the completion of staff training for the use of the system.

At present, the migration of cases from the pilot SAPO application to the new SAPO system is underway for the public prosecutor's offices in Niš. Public procurement procedures are currently ongoing for the continuation of regular maintenance of the application.

Supreme Public Prosecution Office

At this moment, the potential financial resources for development of the new software has not been obtained. Bearing in mind the competence of the Ministry of Justice in infrastructural investments in judicial authorities, it would be expected that such a program would be financed from the budget of that ministry.

It was not foreseen by the Therms of Reference for the SAPO project that this computer program for random allocation of cases would be included as an additional functionality of the SAPO. However these two softwares will be connected and relevant data from the SAPO data base will be used to evaluate cases by their complexity prior to random allocation, in order to enable equal workload of public prosecutors

- At the moment, the system administration and user roles and responsibilities as well as change management procedures for the case management systems are regulated by a Technical Instruction for the use of SAPO that is prepared by the Contractor. Are there plans for this to be regulated through a Legal Act of the Supreme PPO to ensure its mandatory application by all SAPO users and administrators throughout the country?

Ministry of Justice

During 2025, the final phase of the implementation of the new version of the case management system for public prosecutor's offices (SAPO) was initiated. Following the completion of user training, the system has been deployed in a total of ten public prosecutor's offices, including those in Sremska Mitrovica, Ruma, Stara Pazova, Šid, Kragujevac, Aranđelovac and Aleksinac. Further implementation in the remaining prosecutor's offices is expected upon the completion of staff training for the use of the system.

At present, the migration of cases from the pilot SAPO application to the new SAPO system is underway for the public prosecutor's offices in Niš. Public procurement procedures are currently ongoing for the continuation of regular maintenance of the application.

Information concerning the act regulating information management procedures will be made available in the forthcoming period, following the further progression of the migration process.

- Could you please provide information on specialised IT trainings provided to IT professionals in the prosecutors' offices in 2024?

Supreme Public Prosecution Office

Specialised training in the field of information and communication technologies (ICT), for IT professionals were held on 29 October 2024 and on 29 and 30 November 2025. Both events were organised in cooperation with the Council of Europe and European Union.

The aim of the trainings was to enhance the technical knowledge and skills required to support the IT infrastructure in prosecution offices.

High Prosecutorial Council

There were no specialised IT trainings provided in this reporting period, or 2024.

- According to information for 2024, out of 28 IT positions in the MoJ, only 10 were filled. Please provide their functions. How many staff were working in the MoJ at the end of 2025?

Ministry of Justice

As of the end of 2025, IT positions in the Ministry of Justice were systematised and filled as follows:

There are four departments within the Department of Information and Communication Technologies.

Head of Department for Information and Communication Technologies
(*Title: Senior Adviser*)
Systematised: 1
Filled: 1

1. **Department for ICT Systems Development and Design**

Head of Department
(*Title: Independent Adviser*)
Systematised: 1
Filled: 1

Information Systems Designer in the Judiciary
(*Title: Independent Adviser*)
Systematised: 1
Filled: 0

Position for the implementation of information systems development in the judiciary
(*Title: Adviser*)
Systematised: 2
Filled: 1

Position for supporting the implementation of information systems development in the judiciary
(*Title: Junior Adviser*)
Systematised: 1
Filled: 0

2. Department for the Implementation of ICT Projects

Head of Department
(*Title: Independent Adviser*)
Systematised: 1
Filled: 0

IT Operations and Support Position
(*Title: Independent Consultant*)
Systematised: 1
Filled: 0

E-auction Position
(*Title: Adviser*)
Systematised: 1
Filled: 0

Position for Information Sector Development
(*Title: Adviser*)
Systematised: 1
Filled: 1

Position for Coordination of Internet Presentations, Portals and Judicial Communications
(*Title: Employee of the First Category*)
Systematised: 1
Filled: 0

3. Department of ICT Infrastructure and Information Systems

Head of Department
(*Title: Independent Adviser*)
Systematised: 1
Filled: 1

Network Infrastructure Coordinator
(*Title: Adviser*)
Systematised: 2
Filled: 0

Judicial Infrastructure Support Position
(*Title: Junior Adviser*)
Systematised: 1
Filled: 0

Transport Infrastructure System Administrator

(*Title: Associate*)
Systematised: 2
Filled: 1

4. **Technical Support Department and Contact Center**

Head of Department
(*Title: Adviser*)
Systematised: 1
Filled: 1

Position for Business Process Digitisation
(*Title: Adviser*)
Systematised: 2
Filled: 0

IT Support Position
(*Title: Junior Adviser*)
Systematised: 2
Filled: 2

Position for Recordkeeping and Support for the Inventory of Fixed Assets and Work Equipment
(*Title: Junior Adviser*)
Systematised: 1
Filled: 0

Technical Support Position
(*Title: Employee of Type IV*)
Systematised: 1
Filled: 0

Accordingly, the Department of Information and Communication Technologies had 20 systematised positions (24 employees), of which 9 positions (10 employees) were filled. Furthermore, at the end of 2025, the Ministry of Justice employed 111 civil servants on a permanent basis, 5 on a fixed-term basis and 44 on temporary employment contract.

- What is the average age of computer equipment in prosecutor's offices and back up servers?

High Prosecutorial Council

The average age of computer equipment in public prosecutor's office is around 7 years, but it should be taken into account that certain offices are operating on equipment that is older than 10 years. The situation with the back-up servers is no better and, unless addressed, will likely pose a serious problem in the near future.

- Please provide information on how many computers and/or other ICT equipment was purchased by the MoJ in 2024 and 2025 for PPOs.

Ministry of Justice

In 2024 and 2025, the Ministry of Justice purchased the following ICT equipment for public prosecutor's offices (PPOs):

- Operational backup systems: 2 units
- Workstations: 200 units
- Laptops: 10 units
- Servers: 2 units
- Printers (Type 1, A4): 100 units
- Printers (Type 2, A4): 10 units
- Printers (Type 3, A3): 10 units
- Scanners: 50 units
- Access switches (various manufacturers): 535 units

- Please update on the progress regarding the disaster recovery location for prosecution service, which is located in Niš. When will an operational backup system, which is intended to support larger capacities and as we are told is in the process of being established by the MoJ, become fully operational?

Ministry of Justice

With regard to the disaster recovery location for the prosecution service in Niš, the implementation of an operational backup system has been initiated. At this stage, the system has been deployed at the data centre in Nemanjina Street in Belgrade, as the Niš location currently does not provide sufficiently stable connectivity to support reliable operations. It was therefore decided to establish the system at the aforementioned location.

Following the full integration of all relevant systems and the establishment of backup policies and procedures, the plan is to engage the State Data Centre as a redundant disaster recovery location.

- What kind of disaster recovery is already in place for the MoJ, the courts and the PPOs, and what is in the process of establishment? What kind of disaster recovery location will be established, cold, warm or hot site, etc.?

Ministry of Justice

At present, a cold disaster recovery (DR) site has been established. In the event of a failure of the primary location, system recovery is based on the restoration of data from backup copies.

Due to the characteristics of a cold DR site, the re-establishment of full system functionality requires an extended period of time.

- Following the hacking attack on the court and judiciary system in July, following which many services were down and/or geoblocked for months, what actions have been taken for this not to be happen in the future?

Ministry of Justice

At present, new endpoint protections have been added, a SIEM security monitoring solution, additional deception system traps, CATIS threat feeds, and the division of internet access into four layers to be applied in crisis situations.

- It is not clear whether the MoJ's Act on Information Security and Directive on protection measures in the processing of personal data applies for courts and prosecutor's office, or whether these institutions should adopt their own Acts related to Information Security and Personal Data Protection. Could you please clarify?

Ministry of Justice

Each public authority body, which includes courts and public prosecutor's offices, adopts its own internal acts regulating the protection of personal data, while the Ministry of Justice may act as an initiator by providing guidance to judicial authorities in the form of notifications and instructions.

In the field of ICT, the Ministry of Justice is responsible for security matters, including the issuance of guidelines for the development of procedures related to the protection of data in electronic form. The Ministry of Justice may issue guidance on the use of specific applications within defined working environments and may point to issues related to insecure workstations or devices used for data storage; however, each authority remains responsible for adopting its own internal act.

Additional questions Rule of Law report:

- Have there been any observed changes (significant and targeted increase or decrease over the past year) concerning the remuneration/bonuses/rewards for judges and prosecutors?

High Prosecutorial Council

No significant changes were observed in this reporting period.

- Could you please provide an update on the human, financial and material resources for the judiciary including on infrastructure and IT systems?

Ministry of Justice

Human resources

In 2025, the Ministry of Justice approved 36 Act on the internal organization and systematization of jobs in the judiciary (21 for courts and 15 for prosecutor's offices). In 2025, the Commission of the Government of the RS for new employment gave approval for the filling of 368 executors. The Government Commission gave consent for new employment for 296 executors in courts and 72 in public prosecutor's offices.

Financial resources

Law on the Organization of Courts defines proposal and execution of budget funds in Article 87.

Article 87
"The scope and structure of budget funds for the work of the courts are proposed by the High Judicial Council and the Ministry responsible for the judiciary.

The High Judicial Council proposes the scope and structure of the budget funds necessary for the current expenses of the courts, except for the expenses for court personnel, in accordance with the Law on the High Judicial Council and distributes these funds to the courts.

The Ministry responsible for justice proposes the scope and structure of budget funds necessary for current expenditures for court personnel, maintenance of court equipment and facilities, expenditures for investment and capital investments for courts, arrangement and development of the judicial information system, and distributes these funds."

Law on Public Prosecution defines proposal and execution of budget funds in Article 142.

Article 142
"The scope and structure of budget resources for the work of the public prosecution are proposed by the High Prosecutorial Council and the Ministry responsible for justice.

The High Prosecutorial Council proposes the scope and structure of budget funds necessary for the current expenses of the Public Prosecutor's Office, except for staff expenses in the Public Prosecutor's Office, in accordance with the Law on the High Prosecutorial Council and distributes these funds to public prosecutors' offices.

The Ministry responsible for justice proposes the scope and structure of budget funds necessary for current expenditures for personnel in the public prosecution, maintenance of equipment and facilities of public prosecutions, expenditures for investment and capital investments for public prosecutions, arrangement and development of the judicial information system and distributes these funds."

Total approved funds for 2025 under the jurisdiction of the Ministry of Justice for courts is 18.326.963.000 RSD and for public prosecutions is 3.515.735.000,00 RSD.

Material Resources

In order to improve accommodation conditions and create the necessary and modern technical conditions for the work of judicial bodies, the Ministry of Justice has continuously invested,

both in the reconstruction and adaptation of existing facilities of judicial bodies, and in the construction of completely new facilities, designed in accordance with the needs of judicial bodies according to the most modern criteria for that type of facility, as well as in equipping them with new office furniture and necessary equipment (computer, security, communication, etc.).

Based on requests submitted by judicial bodies, monitoring and comparison of existing equipment, the necessary computer, security, office and other equipment was purchased in order to improve technical working conditions.

The implementation of the modernization of computer systems and equipment of judicial bodies was continuously monitored, and in this regard, the necessary equipment (item 512 - Machinery and equipment) was purchased in the facilities of courts and prosecutor's offices.

• January 1, 2025 – December 31, 2025

During the specified period, the following funds were transferred to the judicial authorities in accordance with the requirements and needs for the following budget classification:

425 – ongoing maintenance of facilities and equipment.....RSD 102.599.564,00
511 – buildings and construction facilities ..... RSD 16.191.716,00
512 – machines and equipment ..... RSD 74.520.989,00

In addition, the following capital projects were implemented:

- PROJECT 5006 – PROCUREMENT OF NECESSARY EQUIPMENT FOR THE FUNCTIONING OF JUDICIAL AUTHORITIES

Within this project, various procurements related to computer equipment are planned in order to improve and digitize the judicial system (a detailed report is available in the ICT group), as well as to facilitate the archiving process and the procurement of necessary furniture for the facilities of judicial authorities. In addition to the above, within the framework of this project, the necessary office furniture, security equipment (Explosive Detection Portals and scanners), archive shelves and racks and other equipment for the needs of judicial authorities were purchased.

- PROJECT 5010 – IMPROVEMENT OF ACCOMMODATION AND TECHNICAL WORKING CONDITIONS OF JUDICIAL AUTHORITIES

Within the framework of this project, during 2025, the following works were carried out:

1. The reconstruction and adaptation of the existing building of the Basic Court in Ub (gross area of 1815m2) was completed. The building was connected to the electricity distribution system (the Electricity Supply Agreement was concluded), and the Republic of Serbia was registered in the Real Estate Cadastre of the Municipality of Ub;
- The procurement of necessary equipment (furniture, computers, security equipment, etc.) was also completed and the facility was put into use.

2. Construction of a new building for judicial authorities in Novi Sad - with the aim of creating adequate accommodation and technical conditions for the work of judicial authorities in Novi Sad, and within the framework of the IPA 2017 Program, a project to construct a new building for judicial authorities was implemented, at ul. Stražilovska (on cadastral plot 7962 K.O. N.Sad) in Novi Sad, which is intended to accommodate four institutions - the Higher and Basic Public Prosecutor's Offices and the criminal departments of the Higher and Basic Courts in Novi Sad. The building has 2 floors (2Po+Su+Pr+6) - two basement floors, basement, ground floor and six floors, total gross area - Pbruto = 10,578.74m2
The preparation of technical documentation and the execution of works were financed from EU funds, while the Ministry financed the interior decoration and the purchase of office furniture, as well as the purchase of necessary equipment (computer, security and other equipment necessary for the functioning of the building) from its own funds.
The building is connected to the EDB system and an Occupancy Permit has been obtained. The completion of this facility will provide adequate conditions for the work of special departments, as well as the prosecutor's office dealing with organized crime cases.
3. The preparation of technical documentation (Execution Project - PZI) for the work on replacing the facade joinery and reconstructing the facade of the judicial authorities building in Novi Sad has been completed. (The start of work is planned in 2026)
4. The 1st phase of work on the exterior decoration of the judicial authorities in Niš - the former "Filip Kljajić" barracks has been completed. (Parking, surrounding paths, lighting of the facility, fencing, etc.) The continuation of work is planned for 2026.

TABLE OF PROJECT IMPLEMENTATION DURING 2025.

project	title	Budget classification	2025. total
5006	PROCUREMENT OF NECESSARY EQUIPMENT FOR THE FUNCTIONING OF JUDICIAL AUTHORITIES	512	176.218.000,00
5010	IMPROVEMENT OF ACCOMMODATION AND TECHNICAL WORKING CONDITIONS OF JIDICIAL AUTHORITIES	511	143.830.290,00
total		RSD	320.047.410,00

High Prosecutorial Council

No significant changes were observed in the Council for this reporting period.

- Could you please provide an update on the accessibility of courts (e.g. court/legal fees, legal aid, language), whether there have been any legislative and/or policy developments? What is the state of play with regard to legal aid and how is it used?

Ministry of Justice

According to Art. 10 of the Law on Court Fees, the Republic of Serbia, state authorities and special organizations, authorities of autonomous provinces and authorities of local self-government units, Red Cross organizations, as well as eligible dependents in proceedings related to financial support and persons demanding payment of minimum wage are exempted from paying court fees. The fee for submissions and actions shall not be paid by persons who donate their property to the Republic of Serbia, social-humanitarian, scientific or cultural organizations, institutions or foundations or who, for their benefit, waive property rights on immovable property or assign other real rights on immovable property to them free of charge. A foreign country is exempt from paying court fees if it is stipulated by an international agreement or under the condition of reciprocity. A party in a non-litigation proceedings is exempt from paying court fees for actions or procedures entrusted by the court to a public notary. Parties are exempted from paying court fees if the litigation is concluded by the day of the conclusion of the first hearing for the main hearing through mediation, court settlement, recognition of the claim or waiver of the claim.

Article 10 of the Law stipulates that the court may exempt a person from paying court fees if, taking into account the amount of funds from which the payer and members of his/her household support themselves, by paying the fees, those funds would be reduced to such an extent that their financial security would be threatened.

A foreign citizen shall be exempted from paying court fees if it is stipulated by an international agreement or under the condition of reciprocity. (Art. 12)
The guardian of an absent person whose place of residence is unknown, the guardian of property whose owner is unknown, the temporary guardian of the party appointed by the court in the proceedings and the ex officio defense attorney are not required to pay court fees for the person they represent. (Art. 17)

In the six-year implementation of the Law, and in relation to all the data that the Ministry of Justice has made available on its website by publishing its annual report, it is assessed that Serbia has provided a good level of conditions for effective and equal access to justice. Equal and effective in terms of organizing the procedure for exercising the right to free legal aid for a large part of citizens who fall into categories that, for certain reasons, are unable to bear the costs of legal aid or are assessed as deserving of being included in the circle of prescribed users in terms of the issues for which they apply for free representation. Equal and effective also from the perspective of the quality of support, considering lawyers as competing providers. Regarding lawyers as providers, the Serbian Bar Association, in cooperation with the Ministry of Justice, has devised a solution that involves transparent and objective engagement of this category of providers. The above implies referral to registered lawyers as providers through a call center, a software solution that ensures transparency in this regard and represents, in a certain way, a preventive anti-corruption measure. The positive trend in filing requests confirms the above.

Data collection and statistical processing are currently underway for the reporting period from January 1 to December 31, 2025, in accordance with the provisions of Article 22 of the Law on Free Legal Aid, which stipulates that administrative bodies (local government units and city municipalities) and providers are obliged to submit a Regular Annual Report to the Ministry of Justice by January 31 of the current year for the previous year.

On March 13, 2025, the Ministry of Justice, based on the provisions of Article 22, paragraph 3, and Article 38, paragraph 2 of the Law on Free Legal Aid ("Official Gazette of the Republic of Srpska", No. 87/18), adopted the Regulation on the manner of keeping records of provided free legal aid, i.e. free legal support, and the manner of keeping records kept by the administrative body of a local self-government unit (hereinafter referred to as the "Regulation"), which was published in the "Official Gazette of the Republic of Srpska" No. 22 of March 17, and which enters into force on the eighth day from the date of publication in the Official Gazette of the Republic of Srpska, i.e. March 26, 2025. This Regulation regulates the manner of keeping records of free legal aid, i.e. free legal support, provided and the manner of keeping records kept by the administrative body of the local self-government unit that decides on requests for approval of free legal aid and free legal support. With the entry into force of this bylaw, the Regulation on the manner of keeping records of the administrative body of the local self-government unit on requests for approval of free legal aid and free legal support ("Official Gazette of the Republic of Serbia", No. 68/19) and the Regulation on the manner of keeping records of free legal aid and free legal support provided ("Official Gazette of the Republic of Serbia", No. 68/19) ceased to be valid.

Among other things, the Ministry of Justice, with the support of the UNICEF Office in Serbia and in cooperation with the Judicial Academy, has undertaken activities aimed at improving the system by organizing training courses on the implementation of the Law, in order to strengthen and improve the established system. Training courses on the implementation of the Law on Free Legal Aid are attended by persons in order to obtain a license to decide on requests for the approval of free legal aid or to draw up notarial documents or to mediate in dispute resolution in the competent administrative body. These training courses are intended for law graduates with at least three years of work experience in the profession, and upon successful completion of the training, they receive a three-year work permit from the Ministry of Justice.The training program includes both theoretical and practical classes, which are adapted to the specific challenges in the implementation of the Law. The training courses are held according to the needs of local governments, with careful planning by the Ministry of Justice. Special attention is paid to issues that prove to be the most challenging in practice, with an interactive approach that allows participants to resolve any doubts and better understand the legal regulations.

As regards access for persons with disabilities, our legal obligation is to ensure access for persons with disabilities in all newly built (or reconstructed) facilities, which we respect, thus at the new Judicial Authorities Buildings in Niš, Ub and Novi Sad, the access-ramps were constructed, and also in the planned reconstructions of the buildings of the Third Basic Court in Belgrade and the Commercial Court in Sombor, the access-ramps for persons with disabilities were designed.

- Please let us know if you are aware of any rule of law related challenges, including issues with market access and the conditions for economic activities, faced by businesses or citizens in a cross border context.

Ministry of Justice

The principle of the legal certainty is, on the one hand, a fundamental element of the rule of law, and, on the other hand, is a prerequisite for the good business climate and favorable investment conditions. Regarding the judicial reform, the topic of legal certainty had been deeply discussed throughout the process of the constitutional amendments in the area of judiciary.

On December 4, 2020, the Government of the Republic of Serbia submitted to the National Assembly a Proposal for amending the Constitution of the Republic of Serbia in the part related to the regulation of the judiciary. Before considering the Proposal for amending the Constitution with an explanation at the National Assembly session, the Committee on Constitutional Affairs and Legislation conducts an extensive consultative process on changes to the Constitution, organizing public hearings in order to obtain expert opinions on the Proposal for amending the Constitution with relevant stakeholders including civil society organizations. The Proposal for the amendments of the Constitution was adopted by the National Assembly on June 7th 2021. At its 128th plenary session, the Venice Commission adopted a positive opinion on the Draft Act amending the Constitution and the Draft Constitutional Law for its implementation, which set out certain recommendations for improving the text of the Draft Act amending the Constitution. The new text of the Draft Act amending the Constitution, which implemented the recommendations of the Venice Commission from the final opinion adopted at the 128th plenary session, was submitted to the Venice Commission for an urgent opinion on October 26, 2021. A draft urgent opinion was prepared in November and taken note of by the Venice Commission at its 129th plenary session, held on 10-11. December 2021. After drafting the urgent opinion, the Committee on Constitutional Affairs and Legislation of the National Assembly submitted the Act amending the Constitution for consideration and decision to the National Assembly. The proposed amendments to the Constitution have been confirmed at the referendum on January 16, 2022. The National Assembly of the Republic of Serbia passed the Decision on the promulgation of the Constitutional Law for the implementation of the Act amending the Constitution of the Republic of Serbia on February 9, 2022. Within a period of one year from the day of the adoption of the said Constitutional Law, amendments to the relevant judicial laws were adopted.

Namely, on April 15, 2022, the Minister of Justice adopted the decisions on the establishment of the working groups for drafting the set of judicial laws. the Ministry of Justice has sent the first working texts of judicial laws to all courts, prosecutor's offices, professional associations, the National Convention on the EU (with the request to forward it to all its members), the Delegation of the European Union to the Republic of Serbia and other international partners and organized presentations of the working versions of the set of judicial laws in the seat of all four appellate courts as well as the separate presentation for the representatives of the civil society organizations (20th – 27th of September 2022) where all relevant institutions (judges and public prosecutors, professional associations of judges and public prosecutors, law faculties, the Bar Association of Serbia and its regional bar associations, the Delegation of the

European Union to the Republic of Serbia, the Council of Europe, OSCE, GIZ, UN, USAID) were invited. At the plenary session of the Venice Commission, held on October 21, 2022, the Venice Commission issued a positive opinion regarding the Law on the Organisation of Courts, the Law on the High Judiciary Council and the Law on Judges. Plenary session of the Venice Commission where the positive opinion regarding the Law on Public Prosecution Office and the Law on High Prosecutorial Council was adopted was held in December 15-17th 2022. At the same session, the Venice Commission also adopted a follow-up Opinion on the Law on the Organisation of Courts, the Law on the High Judiciary Council and the Law on Judges. As a part of the public hearing process, the round tables were organized in the seats of 4 appellate courts (21st – 28th December 2022), as well as the separate round table for the representatives of the civil society organizations (January 10th 2023). The set of judicial laws was adopted by the National Assembly on February 9th 2023:

- Law on Court Organization ("Official Gazette of RS, No. 10/23)

- Law on Judges ("Official Gazette of RS, No. 10/23)

- Law on Public Prosecution ("Official Gazette of RS, No. 10/23)

- Law on the High Judicial Council ("Official Gazette of RS, No. 10/23)

- Law on the High Prosecutorial Council ("Official Gazette of RS, No. 10/23)

On March 14th 2023, the Venice Commission adopted the Information to the Follow-up on three previous opinions on Judiciary (opinion and follow-up opinion regarding the Law on the Organisation of Courts, the Law on the High Judiciary Council and the Law on Judges and opinion regarding the Law on Public Prosecution Office and the Law on High Prosecutorial Council). In accordance with the transitional and final provisions of the new normative framework, the lay component of both, the High Judicial Council and High Prosecutorial Council was elected on May 8th 2023 by which the both councils were fully established and the laws started its implementation on May 10th, after the decision was published in the Official Gazette of the Republic of Serbia.

The total designated number of bylaws to be adopted by the Ministry of Justice, High Judicial Council and High Prosecutorial Council is 37, and out of them 35 bylaws were adopted by May 10th, 2024 as prescribed by the set of judicial laws. The Rulebook on Administration in Public Prosecution Offices was adopted in January 2025 ("Official Gazette of RS", No. 10/25 of January 31, 2025). The new Court Rules of Procedure is in the final phase of drafting.

Constitutional amendments, a set of judicial laws, and bylaws for their implementation strengthen the rule of law through greater independence of judges and autonomy of prosecutors, which creates conditions for better and more efficient protection of human rights on which the rule of law is based, thereby increasing legal certainty. Greater legal certainty also affects the inflow of foreign investments and economic progress.

4.3. Efficiency – update on adoption of legislative amendments (civil and criminal procedure), backlog reduction and mediation/alternative dispute resolution

- The implementation of the unified backlog reduction programme (for 2021-2025) continued under the supervision of the Supreme Court, without significant reductions.

Please provide an update about implementation of the proposal to streamline future work on old cases. Do you plan to adopt a new programme as the current one expired end of 2025? How do you plan to increase the rate of reduction?

Supreme Court

Working Group on monitoring the implementation of the Uniform Backlog Reduction Programme in the Republic of Serbia for the period 2021-2025, holds meetings on a regular basis and continuously monitors the implementation of measures and recommendations of the Unified Programme by the courts. Working Group held a meeting on March 21 and November 7, 2025. The conclusions of the Working Group are available on the website of the Supreme Court https://www.vrh.sud.rs/sr/%D0%BF%D1%80%D0%B0%D1%9B%D0%B5%D1%9A%D0%B5-%D0%BF%D1%80%D0%B8%D0%BC%D0%B5%D0%BD%D0%B5-%D0%BF%D1%80%D0%BE%D0%B3%D1%80%D0%B0%D0%BC%D0%B0

Proposals of members of the Working Group for development of the Uniform Backlog Reduction Programme in the Republic of Serbia for the period 2026–2030, will be further discussed on the basis of the Annual Report on the Work of the Courts in the Republic of Serbia for 2025. Namely, new methodology and objectives of the new Uniform Backlog Reduction Programme will be defined on the basis of the new statistical data which should be presented within the Annual Report on the Work of Courts for 2025.

Concerning our efforts to reduce the number of backlog cases, the detailed analysis has been provided within the Annual Report on Work of Courts. As mentioned above, Annual Report for 2025 has not yet been finalized. However, from the data given within the Annual report on work of courts for 2024 it can be seen that certain results have been achieved.

According to statistical data on the work of the courts for the year 2024, on December 31, 2024, regarding backlog cases in 2024, the total number of disposed backlog cases was 205,458, (while in 2023 the total number of disposed backlog cases was 148,531), and in matter without enforcement cases the number of disposed backlog cases during 2024 was 204,179, (while in 2023 in matter without enforcement cases the number of disposed backlog cases was 146,491). In the previous period (until 2020) the issue of backlog enforcement cases was in focus. The number of backlog enforcement cases used to be higher, and consequently after resolving this problem, the numbers of resolved backlog cases dropped to certain level. These are now in majority trial cases. Although, there is still a large number of backlog cases, it has to be seen in the context of different types of cases that burden courts (for example cases relating to bank loans). Also, it should be noted that for the last several years the average case clearance rate has been continuously above 100. The specific issues within certain courts have been noted in our reports and these issues will be tackled in the following period.

- Please inform us regarding the steps you plan to take to address the serious challenges regarding the efficiency of the Administrative Court and reduce the disposition time of first instance cases (as per the step in the Reform Agenda to achieve at least 55% reduction by 2027). Despite the reduction in incoming cases - linked to fewer ‘silence of the administration’ cases - the clearance rate remains low; what are your plans to address this? Please inform us about the steps you plan to take with regard to the worsening situation regarding the number of pending cases before the Constitutional Court. How many cases are currently pending before the Constitutional Court?

Administrative Court

Due to the observed tendency of the growth in the inflow of cases upon the claims for "silence of administration", in 2022 the Administrative Court conducted the analysis of the received claims in the Court Seat and Court Units, upon defendants, as well as upon types of disputes, and took the following measures in order to achieve efficient handling of "silence of administration" cases:

- **Established a register "U-ću" from January 1, 2023, in which all cases upon claims for silence of administration are registered;**
- **Ensured that, in accordance with the Annual Calendar of Tasks in the Administrative Court, "silence of administration" claims are equally distributed to all the judges, upon the schedule starting from the Court Seat;**
- **Keeps track of the inflow of "silence of administration" claims upon plaintiff, defendant, legal representative of the plaintiff;**
- **Regulary notifies judges and judicial associates, regarding the parties with larger number of cases, about the fact of the death of the party / the fact that party notified that they didn't hire the attorney who filed the claim on his/her behalf to the Administrative Court;**
- **Submitted to the Ministry of Justice the Proposal for undertaking the urgent measures in order to improve the work of the Administrative Court and administrative judiciary (Su I-1 156/24 from June 27, 2024).**

Based on the Report on Work of the Administrative Court for period from January 2010 until December 2023 and by reviewing the duties and expeditiousness, as well as by constantly gaining insight into the work of the court as a whole, as one of the measures to ensure the legal, regular, accurate and timely work, the President of the Court conducted the analysis of the organization and results of the work of the Administrative Court in the reporting period. Considering that there are conditions for undertaking the urgent measures to improve the work of the Administrative Court and administrative judiciary, the President of the Court initiated the Proposal for undertaking the urgent measures to improve the work of the Administrative Court and administrative judiciary, Su I-1 156/24 from June 27, 2024. In the stated Proposal, the implementation of the following measures was highlighted as urgent:

a) Selection of the model of the reform of the administrative judiciary, i.e. selection of the model of introduction of the two-instance administrative judiciary in the Republic of Serbia;
b) Establishment of the new network of the administrative courts;
c) Strengthening the capacities of the administrative judiciary (appointing the sufficient number of judges, determining the sufficient number of judicial staff);
d) Amendments to the normative framework in order to achieve optimal organization of the administrative judiciary (introduction of the multi-tier administrative judiciary, introduction of specialization of the Administrative Court judges per administrative matters);

e) Adoption of the new Law on Administrative Disputes in line with the new organization of administrative judiciary and new solutions from the Law on General Administrative Procedure;
f) Providing the adequate spatial capacities for the work of the Court Seat in Belgrade and Court Unit in Novi Sad
g) Redirect funds that would be paid in the future for the established violation of the right to a trial within a reasonable time to the appointment of new judges and judicial associates.

The Subarea **9.6: JUDICIARY – 9.6.1 Reform of the Justice System** of the Reform Agenda of the Republic of Serbia, which was officially adopted on October 3, 2024, defines the step: *Reduce the disposition time (as compared to the situation in 2023) of first instance cases in the Administrative Court by at least 55% (June 2027).*

Bearing in mind the aforementioned and in line with the current normative framework and its jurisdiction, the Administrative Court continued to undertake the measures to improve the efficiency of its work until the implementation of the administrative justice reform, particularly by:

- **Submitting to the Ministry of Justice the Initiative for Amendments to the Law on Court Fees (Su I-1 22/25 from February 11, 2025).**

In the application of the Law on Court Fees ("Official Gazette of the Republic of Serbia" No. 28/94.... 95/2018), in the part relating to the establishment of the value of the subject matter of administrative disputes and the procedure for the collection of unpaid court fees, the Administrative Court identified shortcomings in legal norms that pose obstacles in determining the value of the subject matter of administrative disputes and which prevent the collection of unpaid court fees. For this reason, the President of the Court submitted the Initiative for Amendments to the Law on Court Fees, Su I-1 22/25 of February 11, 2025, to the Ministry of Justice. The initiative proposes urgent amendments to Article 33 in Chapter III „Determination of Value for the Purpose of Fee Collection", and Articles 40 and 41 in Chapter IV „Procedure for the Collection of Unpaid Fees" of the Law on Court Fees. It was also highlighted that it is necessary to amend the Fee Tariff in Chapter VII „Procedure in Administrative Disputes and Procedure for Judicial Protection", Tariff number 28 and Tariff number 29.

- **Submitting to the Ministry of Justice the Proposal of the Administrative Court for drafting the Judicial Development Strategy (Su I-1 124/25 from July 15, 2025).**

Bearing in mind the Public Call of the Ministry of Justice for submitting the proposals related to the future work on the Judicial Development Strategy, the Administrative Court submitted the Proposal of the Administrative Court for drafting the Judicial Development Strategy, Su I-1 124/25 from July 15, 2025. Considering the strategic documents adopted in the period from 2013 until 2025, the EC Progress Reports, the role and significance of the administrative judiciary, challenges in the work of the Administrative Court since the establishment of the Court, the Administrative Court, through the overview of its work, emphasized as necessary that the focus of the Working Group for drafting the future Judicial Development Strategy,

should be on continuation of work on the reform of the administrative judiciary and the improvement of its work efficiency, as an adequate response to the increasingly complex working conditions of the Administrative Court and the efforts made by the court to provide citizens with efficient and effective judicial protection despite the difficult functioning. Within the Proposal of the Administrative Court for drafting the Judicial Development Strategy, Su I-1 124/25 from July 15, 2025, the following measures were proposed:

a) Selection of the model of administrative judiciary reform;
b) Establishment of the Working Group for amending the Law on Administrative Disputes;
c) Amendments to the normative framework in order to achieve optimal organization of the administrative judiciary (introduction of the multi-tier administrative judiciary, introduction of specialization of the Administrative Court judges per administrative matters);
d) Adoption of the new Law on Administrative Disputes, in line with the new organization of the administrative judiciary and new solutions within the Law on General Administrative Procedure;
e) Establishment of the new network of the administrative courts;
f) Strengthening the capacity of the administrative judiciary (appointing the sufficient number of judges, determining the sufficient number of judicial staff);
g) Providing the adequate spatial capacities for the work of the Court Seat in Belgrade and Court Unit in Novi Sad;
h) Providing the ICT work equipment, in line with the needs of the new administrative courts network;
i) Updating the Centralized System for management of cases in standardized manner (SAPS) with new administrative courts network

- **Establishing the Working Group for Drafting the Proposal of the Initiative for Amendments to the Law on Administrative Disputes.**

➢ Statistical data:

Year	Number of judges handling the cases	Total number of received cases	Total number of resolved cases	Received "silence of administration" cases	Resolved "silence of administration" cases
2022	50	63.534	25.176	46.588	12.227

2023	50	78.017	27.692	61.794	14.803
2024	46	42.741	33.047	27.113	20.108
2025	58	36.136	42.910	20.052	30.545
Total:				155.547	77.683

The largest number of "silence of administration" claims in **2023** were filed against 5 public administration bodies:

- The Pension and Disability Fund of the Republic of Serbia, 48.567 claims;
- Ministry of Agriculture, Forestry and Water Management, 3.549 claims;
- Republic Geodetic Authority – 3.432 claims; Ministry of Finance, 2.645 claims;
- Commissioner for Information of Public Importance and Personal Data Protection, 1.906 claims.

The largest number of "silence of administration" claims in **2024** were filed against 5 public administration bodies:

- The Pension and Disability Fund of the Republic of Serbia, 14.126 claims;
- Commissioner for Information of Public Importance and Personal Data Protection, 6.032 claims;
- Ministry of Finance, 2.152 claims;
- Republic Geodetic Authority, 2.756 claims;
- Ministry of Labour, Employment, Veteran and Social Affairs, 1.126 claims.

The largest number of "silence of administration" claims in **2025** were filed against 5 public administration bodies:

- The Pension and Disability Fund of the Republic of Serbia, 9.236 claims;
- Ministry of Finance, 4.295 claims;
- Republic Geodetic Authority, 2.754 claims;
- Commissioner for Information of Public Importance and Personal Data Protection, 2.445 claims;
- The Mayor of the City of Belgrade, 161 claims;

In 2025, number of claims against these 5 public administration bodies makes 52,27% of the total number of received claims in the reporting period, or 94,21% of the total received claims in the "U-ću" register in the reporting period.

In accordance with the performance indicators (CEPEJ), the disposition time of cases, which in 2023 was 2024,38 days, is reduced in 2025 to 1.330,78 days.

Constitutional Court

The Constitutional Court regularly hold sessions of the Constitutional Court, sessions of grande and small chambers, as well as sessions of its working bodies, according to the work schedule determined by the President of the Constitutional Court.
Periodic work plans, adopted by the Court, at the proposal of the President of the Court, and monitoring their execution, are important for case work.
As of December 19, 2025, there are 42.997 cases currently pending in the Constitutional Court.

- Could you please provide an update on why the four vacant positions at the Constitutional Court, which have been vacant since April 2024, have not yet been filled? Do the Councils still need to publish the Rulebook on the nomination procedure before they can proceed with the appointments? Are there any other reasons why proposals for the new appointments have not yet been made? Please also provide an update on your plans and the state of the procedure to fill the positions that were left vacant at the end of 2025 following the retirement of a further 7 judges, following the nomination of ten candidates each from the President's and the Assembly's side to the Court in December.

Constitutional Court

The newly appointed judges — Dr. Dobrosav Milovanović, Ms Maja Popović, Dr. Mihajlo Rabrenović, Dr. Milan Rapajić, Dr. Bojan Tubić, Dr. Zoran Lončar, Dr. Atila Dudaš (Attila Dudás), Dr. Nikola Banjac, Dr. Ranka Vujović, and Ms Jelena Deretić — have assumed office for a nine-year term. The mandates of Ms Snežana Marković, Dr. Milan Škulić, Dr. Tijana Šurlan, Dr. Dragana Kolarić, Mr Miroslav Nikolić, Ms Vesna Ilić-Prelić, Ms Tatjana Đurkić, and Dr. Tamaš Korhec (Korhecz Tamás) expired on 23 December 2025.

Judges Dr. Vladan Petrov and Dr. Nataša Plavšić will continue their mandates and will serve alongside the newly appointed judges.

According to Article 172 of the Constitution of the Republic of Serbia, the Constitutional Court consists of 15 judges, elected for a nine-year term. Five judges are elected by the National Assembly, five are appointed by the President of the Republic, and five are elected by the general session of the Supreme Court.

Three remaining judges of the Constitutional Court are to be elected by the General Session of the Supreme Court.

National Assembly

Under Article 172, paragraph 1 of the Constitution of the Republic of Serbia, the Constitutional Court shall have 15 justices who shall be elected and appointed for the period of nine years.

Under Article 172, paragraph 2 of the Constitution of the Republic of Serbia, five judges of the Constitutional Court are elected by the National Assembly, five are appointed by the President of the Republic and five by the General Assembly of the Supreme Court.

Under Article 172, paragraph 3 of the Constitution of the Republic of Serbia, the National Assembly elects five judges of the Constitutional Court from among ten candidates nominated by the President of the Republic; the President of the Republic appoints five judges of the Constitutional Court from among ten candidates nominated by the National Assembly; and the General Assembly of the Supreme Court appoints five judges from among ten candidates jointly nominated at a joint session of the High Judicial Council and the High Prosecutorial Council.

On 18 December 2025, upon the Nomination of the President of the Republic, the National Assembly elected Prof. Dr Dobrosav Milovanović, Maja Popović, Prof. Dr Mihajlo Rabrenović, Prof. Dr Milan Rapajić and Prof. Dr Bojan Tubić as judges of the Constitutional Court.

On 18 December 2025, from the list of candidates for Constitutional Court judges established by the National Assembly of the Republic of Serbia on 18 December 2025, the President of the Republic appointed Prof. Dr Zoran Lončar, Prof. Dr Attila Dudas, Asst. Prof. Dr Nikola Banjac, Ranka Vujović and Jelena Deretić as judges of the Constitutional Court.

The elected and appointed judges of the Constitutional Court took office on 24 December 2025 by taking the oath before the Speaker of the National Assembly.

At present, 12 out of the 15 positions at the Constitutional Court are filled. Judges are to be appointed to the three vacant positions by the General Assembly of the Supreme Court.

High Prosecutorial Council

As the candidates for the Constitutional Court are proposed by both the High Prosecutorial Council and the High Judicial Council, a draft of the Rules of procedure for the joint session of both Councils (HJC anc HPC) was completed in 2025. This draft is yet to be adopted.

After the adoption of this act, candidates will be named by both Councils and presented for election to the Supreme Court.

High Judicial Council

The High Judicial Council has prepared the Draft Rules of Procedure on Joint Session, which regulate the procedure for proposing candidates for judges of the Constitutional Court and submitted it to the High Prosecutorial Council. The High Prosecutorial Council has not submitted the response yet.

- The Venice Commission has recommended since 2021 the need to reform the Constitutional Court in particular with regard to the introduction of a qualified majority and the anti-deadlock mechanism for the election of the judges of this court by the Parliament. Are you intending to address this recommendation in the future? Please provide an update regarding the introduction of the case-weighting formula in the prosecution offices.

Ministry of Justice

The election of judges of the Constitutional Court is regulated by the article 172 of the Constitution of the Republic of Serbia and by the Law on the Constitutional Court therefore the provisions of the Law on Judges are not applicable.

In December 2025, new judges of the Constitutional Court of the Republic of Serbia were elected.

High Prosecutorial Council

There are no updates on this issue. The formation of the Commission for case weighing by the Council is still pending.

Additional questions Rule of Law report:

- Have any measures been taken to enhance transparency and strategic communication of the judicial system (e.g. unified online access to court data)?

Ministry of Justice

In the period from 2020 to 2025, the Republic of Serbia implemented a comprehensive set of measures aimed at strengthening transparency, accountability and strategic communication in the judicial system, primarily through the development and consolidation of a coherent and centralized e-Justice framework.

Significant progress has been made in providing unified, transparent and user-oriented online access to court data, procedures and services. This includes the establishment and further development of centralized electronic platforms, such as the e-Notice board for the publication of judicial and executive acts, the e-Auction system for the fully electronic sale of movable and immovable property, as well as electronic case tracking tools that allow parties to follow the course and status of enforcement proceedings in real time. These solutions have contributed to increasing legal certainty, predictability of proceedings and public trust in the work of judicial authorities.

Transparency was further improved by the introduction of electronic monitoring mechanisms and automated warning systems in enforcement and security procedures, which enable timely observation of legally relevant changes in relation to enforcement debtors. In parallel, the establishment of public and professional electronic registers, including the Register of issued and revoked powers of attorney and the Register of Wills, significantly improved the verifiability, traceability and authenticity of legal acts. The introduction of QR codes for verification enables citizens and competent authorities to easily check the validity and integrity of electronically issued documents, which further reduces the risk of abuse and fraud.

Strategic communication in the judiciary was additionally strengthened through the connection and interoperability of a large number of judicial information systems with the state e-Government platform. In this way, the citizens of the Republic of Serbia are enabled to obtain court and other judicial documents, such as certificates, certificates and decisions, quickly and

easily, electronically, without the need to personally visit the courts or other institutions. Integration with e-Government provides a single point of access, greater availability of services and more efficient data exchange between judicial authorities and other state administration authorities.

The implementation of the single sign-on system for judicial professions further improved internal communication and operational efficiency, while the standardization of electronic communication channels between courts, public prosecution offices, public notaries, public bailiffs and citizens enabled a more consistent, transparent and timely exchange of information.

The aforementioned measures are supported by continuous investments in ICT infrastructure, cyber-security, data exchange systems, video-conferencing technologies, as well as advanced analytical and reporting tools. These investments ensure the sustainability, resilience and integrity of the e-Justice system, enable decision-making based on data and strengthen the capacity of the judiciary to effectively respond to the needs of citizens and broader strategic goals in the field of transparency, efficiency and access to justice.

High Judicial Council

The High Judicial Council, at its session held on December 25, 2025, adopted the Communication Strategy of the High Judicial Council and Courts for the period 2026-2030. The Communication Strategy was developed in cooperation with the OSCE.

The Communication Strategy of the High Judicial Council and Courts represents a five-year framework from 2026 to the end of 2030, which should be updated every two years through an Action Plan. The Action Plan contains specific measures, activities, deadlines, required resources and bodies/institutions responsible for implementing the activities. The Council adopts the Communication Strategy for the period from 2026 to 2030.

The Council also prepares a two-year Action Plan, which is subject to changes and regular updates depending on needs and newly arising situations.

Supreme Court

In 2025, the Supreme Court successfully implemented the project “Improvement of the Case Law Database”, carried out within the joint program of the European Union and the Council of Europe “Support to the Implementation of Judicial Reform in Serbia”, with the support of the Council of Europe Office in Belgrade.
The amended and supplemented Open List of Descriptors (adopted by the Working Group for Amendments and Supplements to the Open List of Descriptors on January 17, 2025) has been implemented.
The Supreme Court enhanced the functionality of search methods and increased the number of decisions in the Case Law Database, marking and entering 7,415 (up to January 2026) new decisions of the Supreme Court into the database.
The Supreme Court, in order to improve knowledge and skills for the purpose of the efficient use of the electronic case law database, organized trainings for judges, legal advisors, IT staff and other court staff (registry etc).
Relevant trainings were also organized for the representatives (judges and judicial advisors) from the Appellate Courts as well as State Level Courts - Commercial Appellate Court, Administrative Court, Misdemeanor Appellate Court.

Also, dual linking of decisions of the Supreme Court in the case law database https://sudskapraksa.sud.rs/sudska-praksa with relevant ECtHR decisions in the eCASE database of the Judicial Academy (https://www.e-case.eakademija.com) has been functional.
The entry of court decisions of appellate courts and republic-level courts into the Case Law Data Base is continued. By December 30, 2025, the total number of uploaded court decisions amounted to 536,919 integral decisions and 76,243 anonymized decisions.

High Prosecutorial Council

The work of the Council is already as transparent as possible. All the sessions are livestreamed and recorded; hence the previous sessions are therefore accessible to anybody at any time via the website and the official YouTube channel of the Council. All the work materials for the sessions are published at least five days in advance. All the records as well as decisions reached on the Council sessions are published on the website as well. There is a possibility (that has been used in practice) for all interested parties to attend sessions of the Council in person as well, with prior notice.
As stated above, numerous announcements were published both through the Council website and by sending them directly to news agencies and the media for publication. The purpose was to clarify the situation in public prosecution, as well as the courts to the public, leaving no room for speculation and misinformation.
These efforts were partly unsuccessful due to many media houses' failure to publish these announcements and statements of the Council, which could be potentially defined as a form of censorship.

Supreme Public Prosecution Office

The Supreme Public Prosecution has been taking various measures to enhance transparency and strategic communication. On its website there are information on the organisation of the Supreme Public Prosecution and its competences, as well as separate sections on international cooperation and mutual legal assistance, fight against corruption, safety of journalists and prosecutorial practise. Furthermore, upcoming events and other various activities are presented.

In recent years, and especially over the past six months, activity in informing the public about undertaken actions and work of the Supreme Public Prosecution through press releases has been intensified. Unlike in previous years, there has also been an increase in giving statements and interviews to news media, as well as appearances by public prosecutors of the Supreme Public Prosecution on television programs of an informative nature.

Additionally, transparency of work is ensured through the publication of the Work Informer, the Rulebook on Internal Organisation and Job Classification, Annual reports on the work of public prosecutions, as well as periodic reports in specific areas, such as records on the implementation of Article 54a of the Criminal Code, reports on criminal offences committed against minors, reports on proceedings concerning criminal offences against journalists. Within the section on prosecutorial practice, it is possible to search the General Mandatory Instructions of the Supreme Public Prosecution regarding the proceedings in cases of specific types of criminal offences.

- Please provide a short update on the transparency of administrative decisions and sanctions, including their publication and rules regarding the collection of related data.

Administrative Court

In cooperation with the German Organization for International Cooperation (GIZ) within the Project "Strengthening the Rule of Law in Serbia", the Administrative Court developed a new website of the Administrative Court, which additionally enhances the search of all the relevant data about the work of the Administrative Court. On October 16, 2024 the new website of the Administrative Court was officially launched.

On its website (https://www.up.sud.rs/en/home/) and in the Case-Law Database of the Supreme Court (http://sudskeodluke.sud.rs/), the Administrative Court made available to the public around 32.417 anonymized decisions of the Administrative Court (updated data from January 8, 2026). Decisions of the Administrative Court are published and anonymized in accordance with the Rulebook on Replacement and Omission (pseudonymization and anonymization) of Data in the Court Decisions (Su I-1 66/19 from June 28, 2019, available at the Administrative Court's website). This Rulebook regulates the manner of replacement and omission of the data in the court decisions, which are published or made available to the public, in accordance with the law regulating personal data protection.

The criteria for the selection of decisions to be published on the website of the Administrative Court are the following: (1) Whether the selected decisions express the legal standings and opinions of the Administrative Court adopted at the Sessions of all judges; (2) Whether the decisions are of public interest in respect of current social events (migration, protection of competition and other); (3) Whether the decisions are related to the administrative matters in which the claims are most commonly filed before the Administrative Court and for which there is a need to predict the outcome of the administrative dispute, at least to a reasonable degree of certainty.

- Were there any initiatives since the last JLS Subcommittee to foster the rule of law culture in the country, such as debates in the Parliament on the rule of law, public information campaigns on rule of law issues, education initiatives etc.?

Ministry of Justice

The strengthening of the rule of law is a continuous process and it demands continuous efforts in every single country to follow the current state of play and through the improvement of the relevant normative framework further strengthen the rule of law. This is not ticking the box activity, but rather the series of different activities that are and will be conducted in a continuous manner. The processes of preparation of new laws, amendments of the existing laws, as well as strategic documents in order to further strengthen the rule of law are being conducted in a comprehensive and inclusive manner and this includes several important details as follows:

- Establishment of the working groups with representatives of all relevant institutions as well as representatives of civil society organisations;
- Organisation of the transparent public hearing processes for each document;
- Communication and cooperation with the relevant international organisations;
- Lack of the urgent adoption procedures before the Parliament.

In this way, the Republic of Serbia in a continuous manner conducts these important processes having both, official state authorities and civil society organisations, on board when discussing the normative and strategic developments in order to strengthen the rule of law.

National Assembly

The Committee on the Judiciary, Public Administration and Local Self-Government did not have any initiatives to foster the rule of law culture in the country, such as debates at the National Assembly on the rule of law, public information campaigns on rule of law issues, education initiatives, etc.

4.4 Domestic handling of war crimes – Strategy and Action Plan, track records, regional cooperation, victims support and protection, compensation to victims and reparations

- According to the National Strategy for the Prosecution of War Crimes 2021-2026, Serbia has a backlog of over 1700 pre-investigative cases. Please inform us, under the leadership of the War Crimes Prosecutor, on what steps will be taken to increase the pace of processing war crimes cases and address the significant case backlog.

Public Prosecutor's Office for War Crimes

The data on the stated number of cases used for the purposes of developing the National War Crimes Strategy and the accompanying action plan referred only to cases that the Public Prosecutor's Office for War Crimes (hereinafter: PPOWC) successively took over from prosecutors' offices of a general jurisdiction over a certain period. Therefore, the stated number does not include all cases that were already the regular caseload of the prosecutor's office at that time, and is therefore not an accurate indicator of the total number of all pre-investigation cases of the office. The prosecutor's office has pointed this out on several occasions.

As we have also previously pointed out, a large number of pre-investigation cases do not constitute a "backlog," since these are cases that are not active, and where the majority of perpetrators are unknown, in which all possible actions have been taken and which have been temporarily archived. The number of pre-investigation proceedings periodically changes and grows, given that in the past few years the PPOWC has, among other things, been engaged in the analysis of documentation from the Archives of the former Federal Committee for Collecting Data on Violations of International Humanitarian Law and Crimes against Humanity Committed on the Territory of the Former SFRY from 1991-1999, when new cases were formed in the pre-investigation. In addition, during 2024, a search was conducted of documentation submitted to the prosecutor's office by the Republic Center for Research of War, when events that may have an element of a war crime were also identified and new cases were formed on that basis.

Given that the PPOWC has been operating with limited operational capacities since May 2025, which has delayed the creation of a database of war crimes cases and

prioritization, it is not possible to precisely define the dynamics and pace of case processing at this time.

- Last year you updated that the appointment procedure of the new Chief War Crimes Prosecutor was ongoing. Please provide an update on this process, including more information as to the delay.

Public Prosecutor's Office for War Crimes

The procedure for the election of the Chief Public Prosecutor for War Crimes is still ongoing. The mandate of the previous acting Chief Public Prosecutor for War Crimes expired on 15 May 2025, but a new acting Chief Public Prosecutor has not been appointed, although s/he was proposed by the Supreme Public Prosecutor, and since then the PPOWC has been operating with a limited operational capacity. In accordance with the Law on the Public Prosecutor's Office, the decision on the election is within the competence of the High Prosecutorial Council, whose representative will provide more information on the matter.

High Prosecutorial Council

The election of the Chief War Crimes Prosecutor is still pending.

- Please inform about the reasons for the appointment of an Acting Chief War Crime Prosecutor not taking place.

Public Prosecutor's Office for War Crimes

As already answered in the first question, the decision on the selection is within the competence of the High Prosecutorial Council.

High Prosecutorial Council

Currently, the Council is deadlocked and unable to appoint an Acting Chief War Crime Prosecutor.

- Previously, you informed that intensive work is being done to reduce the number of backlog cases. Could you please provide an update on this work and what success has been achieved? What are the annual targets and are cases with high level suspects given priority? Have cases been categorised?

Public Prosecutor's Office for War Crimes

As we had previously informed, a certain number of pre-investigation cases were reviewed, of which a number were set aside as temporarily archived, marked "until the perpetrator is discovered," since all possible actions have been taken. These cases are not permanently archived, given that most of the cases within the jurisdiction of the PPOWC are not subject to a statute of limitations and it can be expected that at some

point evidence will become available that could lead to the discovery of the perpetrators and reopen these proceedings.

Simultaneously with the temporary archiving of pre-investigation cases, which has contributed to the reduction of the number of old cases, new cases were opened that the prosecution came to by processing documentation from the Committee's Archives and that were obtained from the Republican Center for Research on War.

The annual goals for 2025 are more closely defined in the plan and program of work of the prosecutor's office, and are also expressed through strategic documents. One of the goals is to increase work efficiency, to issue new indictments, while the prioritization of cases against high-ranking perpetrators is stated through the revised Prosecutorial Strategy, based on which cases with higher ranking accused persons in the military, police and civilian authorities are to be considered a priority.

The first round of the selection and prioritization of cases in the pre-investigation and investigation phases was completed in early 2025, when the working group report was prepared, along with a proposal for further steps. However, three members of the working group no longer work in the PPOWC, which in turn has led to a temporary halt in selection and prioritization, until new members are appointed. The decision on this lies with the Chief Public Prosecutor for War Crimes or the formal acting Chief Public Prosecutor.

- By when do you expect to complete the investigation, prosecution and adjudication of all war crimes cases?

Public Prosecutor's Office for War Crimes

In investigations where the perpetrators are known, the prosecutor's office makes daily efforts to obtain high-quality evidence in order to establish a solid foundation for the indictment, as anything to the contrary leads to delays in the proceedings or unnecessary costs. The length of proceedings in the investigation phase is difficult to determine, given that, due to the nature of the crimes, one of the most important means of evidence for the prosecution of war crimes is the testimony of witnesses, given the limited choice of other means of evidence due to the long passage of time since the events in question.

It should also be borne in mind that a certain number of cases may be transferred from other prosecutors' offices of the Republic of Serbia, which will also require additional time and commitment to these cases, if the conditions for their takeover are met.

The length of the trial, in addition to the response of witnesses, is also influenced by some other factors, such as the court's caseload, the orderly response of other participants to the court summons, and various procedural issues that may arise, which are impossible to predict in advance.

- Bearing in mind the interim benchmark which calls for a track record in the investigation, prosecution and adjudication of a high number of cases against high level suspects, please inform about how you have tackled this benchmark in the past 10 years and how you intend to increase the number of cases involving high level suspects.

Public Prosecutor's Office for War Crimes

Starting from 2017 onwards, the number of proceedings against high-ranking and mid-ranking perpetrators has increased. A certain number of such cases were referred to the PPOWC on the basis of international legal assistance from the Prosecutor's Office of Bosnia and Herzegovina, and criminal prosecution was taken over in these proceedings. In certain cases, proceedings against high-ranking perpetrators were opened on the basis of documentation forwarded to this prosecutor's office as part of cooperation with the IRMCT, while in some cases the prosecutor's office itself opened investigations against high-ranking suspects, some of which are still ongoing, and in some cases indictments have been filed or proceedings have already been concluded (the Trnje and Petrovačka cesta cases).

In this regard, it is worth mentioning the latest report of the Chief Prosecutor of the IRMCT, which stated that Serbia has demonstrated the ability to handle more complex cases and establish successful regional cooperation with regional partners, especially with Bosnia and Herzegovina.

The priority treatment in such cases is determined by the revised Prosecutorial Strategy for the Investigation and Prosecution of War Crimes, with the proviso that, again, as in our previous response to this question, we point out that the majority of proceedings against the highest and most senior military, police and civilian officials of the Republic of Serbia have already been conducted and concluded before the ICTY and the IRMCT. The evidence and facts collected in these proceedings were not submitted to the judicial authorities of the Republic of Serbia from the outset, but successively, which influenced the subsequent prosecution of these individuals.

- Please inform us what steps Serbia has taken to increase the number of war crimes cases where financial compensation is granted to victims in criminal proceedings. Please inform about the reasons why there have not been any cases of financial compensation granted to the victims of war crimes in criminal proceedings.

Higher Court and Supreme Court

Regarding this issue of compensation for non-pecuniary damages to the victims, see the answer under 3.5.

Public Prosecutor's Office for War Crimes

The role of the PPOWC in criminal proceedings is to collect data that may be of importance for damage compensation, as well as to provide assistance and advice to victims during the investigation. As a rule, when questioning victims, the prosecutor's office, in accordance with the law, informs victims of their rights in this regard.

However, the practice is that in criminal proceedings (not only for war crimes, but also in other criminal proceedings) property claims are rarely decided, and the injured parties are usually referred to litigation. In addition, war crimes cases are inherently complex, contain numerous complex legal and factual issues that need to be discussed in the proceedings, and take a long time, whereas determining compensation for damage would require additional time, which is the most common reason why this issue is not resolved in criminal proceedings.

In order to advance this issue, in 2018 the Supreme Court of Cassation adopted Guidelines for the Improvement of Judicial Practice in Proceedings for Compensation

of Damage to Victims of Serious Crimes in Criminal Proceedings. We expect that the implementation of training for public prosecutors and judges dealing with war crimes proceedings will significantly contribute to the easier application and better understanding, as well as the implementation of this document, as envisaged by the National Strategy for the Prosecution of War Crimes.

- Could you please present how Serbia has engaged in regional cooperation and good neighbourly relations in handling of war crimes? In particular, how has Serbia engaged in such cooperation with Croatia and Pristina, by avoiding conflicts of jurisdictions and ensuring that war crimes are prosecuted without any discrimination' over the past year, and specifically with Croatia and Pristina?

Public Prosecutor's Office for War Crimes

Over the past year, regional cooperation in the prosecution of war crimes took place through the exchange of requests for assistance, regarding which there are statistical data that are forwarded to relevant institutions, and which are publicly available within the framework of quarterly reports on the implementation of the National Strategy for the Prosecution of War Crimes.

We have repeatedly pointed out that cooperation with the Republic of Croatia has been at a standstill for a long time. Requests for legal assistance from the PPOWC are usually not met since the requested actions are not carried out, but rather the answers are that so-called surveys or other activities are being carried out, without a detailed explanation of what specific actions are involved. A particular obstacle to cooperation is the Law on the Nullity of Certain Legal Acts of Judicial Bodies of the Former Yugoslav Republic of Macedonia, the Socialist Federal Republic of Yugoslavia and the Republic of Serbia from 2011, adopted by the Republic of Croatia.

Cooperation with the Prosecutor's Office of Bosnia and Herzegovina took place through the exchange of requests for legal assistance. Also, the PPOWC received six cases from the Prosecutor's Office of B-H in the previous period for consideration and possible criminal prosecution. A certain number of these cases have been reviewed and, after detailed analysis, returned for procedural reasons, while a smaller number of cases are still under consideration.

Cooperation with the Provisional Institutions in Priština is not regional, since it involves the AP of Kosovo and Metohija, which is a part of the Republic of Serbia. This cooperation should take place through EULEX in Priština, based on the Mutual Legal Assistance Procedures adopted by the Conclusion of the Government of the Republic of Serbia from 2013. However, this cooperation is still at a standstill, as inquiries from the PPOWC are not answered, nor has any feedback been received.

The National Strategy recommends that regional cooperation be strengthened through joint participation in regional conferences, and in 2025, the PPOWC responded to the invitation to attend a conference in Podgorica, Montenegro, and in Skopje, North Macedonia. Significantly, both conferences were dedicated to considering the issue of witness participation in war crimes proceedings, as well as their protection.

War crimes proceedings for which the PPOWC is competent are conducted in accordance with the principle of non-discrimination, which is explicitly provided for in the revised Prosecutorial Strategy for the Investigation and Prosecution of War Crimes, which in turn stipulates that universality, independence, impartiality and the prohibition of discrimination on any grounds are the basic principles in the proceedings of the

PPOWC, specified and expressed in the provisions of the Constitution, laws and by-laws.

- Could you please inform whether Serbia, through its Liaison Prosecutor at Eurojust, has made use of the agency's Core International Crimes Evidence Database (CICED) for enhancing the coordination of its investigations into war crimes or would consider to do so? Has there been any other practical coordination through Serbia's Liaison Prosecutor regarding international crimes with other national authorities at Eurojust?

Public Prosecutor's Office for War Crimes

Cooperation with Eurojust is regularly established through the liaison officer of the Republic of Serbia, regarding the collection of evidence, information and data relevant to PPOWC cases.

Supreme Public Prosecution Office

Liaison prosecutor at Eurojust has been monitoring all the updates since the establishment of the Core International Crimes Evidence database, although no case has yet been registered in which the information from this database has been used.

There has been practical coordination through Serbian Liaison Prosecutor at Eurojust with Croatia`s contact point.

- Could you please present how Serbia has engaged in cooperation with its neighbours to achieve progress in resolving the missing persons dossier?

Commission on Missing Persons

Commission on Missing Persons (Commission) continuously takes measures and actions on different levels in order to speed up resolving cases of missing persons.

In order to resolve cases of missing persons in the Autonomous Province of Kosovo and Metohija (AP KiM) within the work of the Working Group on Missing Persons, several meetings were held at different levels, to reach an agreement on all aspects of future cooperation, the exchange of available data and documents about missing persons and their burial places, planning future joint activities on field, and also reaching an agreement concerning the search of domestic and international archives. In this regard, the following meetings were held:

- Meeting of the Working Group on Missing Persons on the territory of the AP KiM under the auspices of the ICRC on June 26, 2025 in Geneva,
- Meetings of the Working Sub-group on Forensic Issues and the Analytical Team on September 18, 2025 in Priština
- Meeting of the Working Sub-group on Forensic Issues on November 18, 2025 in Priština
- Meeting of the Analytical Team on November 18, 2025 in Priština.

Regarding the finding of the missing persons from the conflicts on the territory of AP KiM and undertaken commitments of the Belgrade Delegation, in cooperation with the competent authorities, the Commission continued activities of the field search on site "Golo brdo" in Kozlje village near Novi Pazar. These activities lasted from September

10 to November 27, 2025 (43 working days). Field activities were temporarily suspended due to weather conditions. In order to end the search of this location, work on this site will continue in 2026, as soon as weather conditions allow.

On November 9, 2025 the location Banja, Novi Pazar was surveyed by satellite. The terrain was photographed by a drone, using the LiDAR technology. After the analysis of a series of maps, 1 zone of special interest with potential for more detailed forensic processing was spotted and separated. The recommendation of the experts was to conduct a terrain survey of the marked zone within that area complex. The terrain survey was conducted on November 28, 2025 and did not result in any mortal remains.

Regional cooperation

Although there were no bilateral meetings of competent bodies for the issue of missing persons in the reporting period on the operational level, all available information and documents important for resolving cases of missing persons are exchanged continuously. Within these activities, the Commission was particularly committed to collecting information about places of residence and contacts information of missing persons' families in the Republic of Serbia, in the region and in third countries, who have not yet reported the disappearance of their family members and/or have not given their reference blood samples for DNA analysis in order to identify missing persons. This activity contributes to reducing the number of missing persons cases, but also reducing the number of unidentified mortal remains in morgues in the region (currently there are approximately 2.850 of them – 900 in the Republic of Croatia, 1.650 in Bosnia and Herzegovina and 300 in Priština). In order to achieve progress in resolving cases of missing persons of joint interest, through cooperation with neighbours in the region, available information and documents which contain data about missing persons were analyzed and special attention was on connection between resolved cases of missing persons and those who are still missing, so-called "group disappearances".

Speaking about the aspect of the multilateral cooperation, the Commission actively participates in the work of the Missing Persons Group (MPG). The last session of the MPG was held on July 4, 2025 in Sarajevo, in organization of the International Commission on Missing Persons (ICMP) and the Missing Persons Institute of BiH, with the support of the UNDP. During this session, the results of previous activities, the perceived possibilities for work improvement, and the adjustment of principles for future joint performances and reporting were considered, while the focus of participants was on strengthening of the regional cooperation. This mechanism also implies work within a task force for unidentified (N.N.) cases through established regional database of missing persons named "Database of active missing persons cases from conflicts on the territory of former Yugoslavia". The database is updated by the competent bodies for the issue of missing persons in the region, on a daily basis. This is how information between competent bodies is exchanged and this database also provides accurate records about missing persons. As a support to this mechanism of cooperation, a special meeting of domestic institutions competent for the issue of missing persons from the Republic of Serbia, Montenegro and so-called Kosovo* was held from June 15-17, 2025 in Skadar, organized by the ICMP. This meeting represents another way of making an extra effort regarding the resolving cases of joint interest from conflicts on the territory of the AP KiM.

In the reporting period 3 cases of missing persons were resolved. 1 case of missing person in the Republic of Croatia, 1 case in Bosnia and Herzegovina and 1 case in the AP KiM.

The Commission daily contacts the families of missing persons to inform them about the current status of cases, collects new information and facts that can help in resolving the fate of their missing family members. Also, the Commission cooperates with associations of missing persons' families, realizes part of activities through these associations, and also gives them help and support in the organization of conferences, forums, roundtables and other activities.

- Could you please present the state of play as regards the preparation of the draft Law on missing persons?

Ministry of Labour, Employment, Veterans and Social Affairs

After the election of the new Government (elected on April 16, 2025), the formation of a new Working group for the drafting of the Law on missing persons began. It is expected that the Working Group, which will continue work on the existing text of the Draft Law on Missing Persons, will be formed in early 2026.

5. Judicial cooperation in civil and criminal matters

- Please provide statistics about the number of incoming and outgoing requests for judicial cooperation both in civil and criminal matters for the period 2025.

Ministry of Justice

Due to tehnical issues, the Ministry of Justice is not available to provide with the number of incoming and outgoing requests for judicial cooperation both in civil and criminal matters for the period 2025.

5.1. Judicial cooperation in civil matters

- Please update on state of play as regards the (comprehensive, cross-sector) alignment of the legislation with the EU *acquis* and on follow-up actions after previously finalising the gaps and needs analysis of the administrative, budgetary and training issues.

Ministry of Justice

The Ministry of Justice is planning to prepare the analysis for normative framework of the judicial cooperation in the civil matters. The analysis is expected to be completed in the first half of 2026, and the legislative amendments to the Law on Resolution of Conflict of Laws with Regulations of Other Countries (or a completely new law, depending on the scope of amendments) are expected to be adopted by the end of 2026.

As a follow up of analyses of administrative capacities, the Ministry of Justice in the area of judicial cooperation in civil matters, made 7 decisions on the establishment of an employment relationship.

- Please inform us about progress in revising the civil procedure code, as the framework law to also cover international cooperation.

Ministry of Justice

The Ministry of Justice plans to continue work on amendments of the Civil Procedure Code during 2026, after the finalization and adoption of all the legislation in the field of criminal law.

- Please update on the state of play/developments on joining the HCCH 2019 Judgments Convention (Recognition and Enforcement of Foreign Judgments in Civil or Commercial Matters). Have any steps been taken towards Serbia joining the Convention?

Ministry of Justice

The Ministry of Justice is in the process of considering the compliance of the HCCH 2019 Judgments Convention with other international treaties that the Republic of Serbia has ratified so far.

- Please update on the state of play/developments on joining the HCCH 2000 on the International Protection of Adults. Have any steps been taken towards Serbia joining the Convention?

  The ratification process of the HCCH 2000 on the International Protection of Adults has not been initiated.

- Please inform us about Serbia´s attendance at activities of the European Judicial Network (EJN) in civil and commercial matters that aim at facilitating the alignment with the EU *acquis*. Please update as regards the nomination of contact persons who will cooperate with the EJN.

Ministry of Justice

The Republic of Serbia, in its capacity as an observer, participated in the 101st Meeting of Contact Points of the European Judicial Network in Civil and Commercial Matters, held from 17 to 18 June 2025 in Warsaw, Republic of Poland. The meeting was devoted to the consideration of issues of relevance for the application of Regulation (EU) 2019/1111 (Brussels II-b).

Participation of the Republic of Serbia

The Republic of Serbia was represented at the event by a member of its delegation in the capacity of observer. During the opening session, the hosts expressed their special appreciation

to the Republic of Serbia for its participation in this highly significant event, underlining that Serbia's presence constitutes an important step and a clear indication of its commitment to further alignment with the European Union acquis, as well as to the continuation of its path towards full membership in the European Union.

Objective of the meeting

The 101st Meeting of Contact Points focused on the practical application of, and challenges related to, the implementation of Regulation (EU) 2019/1111 (Brussels II-b), which has been applicable since 1 August 2022 and which replaced the former Brussels II-a Regulation. The discussions were aimed at the exchange of experiences among EU Member States, as well as at enhancing cooperation between judicial authorities in cross-border family law matters.

Key topics and discussions

Practical application of the Brussels II-b Regulation
Contact points and central authorities addressed the day-to-day challenges in the application of the Regulation, with particular emphasis on the interpretation and consistent application of the new rules in practice.

Protection of children and international child abduction

The meeting included discussions on harmonised rules concerning child abduction within the EU, including clearly defined deadlines to ensure expeditious proceedings, as well as provisions on the cross-border placement of children, highlighting the obligation to obtain prior consent in the majority of cases.

Cooperation and mutual trust

In line with the priorities of the Polish Presidency of the Council of the European Union, the need to further strengthen cooperation and mutual trust between the judicial systems of the Member States was underscored, as this is essential for the effective functioning of the EU area of justice in civil and commercial matters.

5.2. Judicial cooperation in criminal matters including cooperation with Eurojust, the European Public Prosecutor's Office (EPPO) and participation to Joint Investigation Teams (JITs)

- Please update on the state of play/developments on the judicial cooperation in criminal matters including cooperation with Eurojust, the European Public Prosecutor's Office (EPPO) and participation to Joint Investigation Teams (JITs).

Ministry of Justice

As regards cooperation with the European Public Prosecutor's Office (EPPO), the analysis of the modalities of cooperation with the EPPO was carried out in 2025 through the project "IPA

2019, EU for Fight against Corruption and for Fundamental rights.“ The Ministry of Justice is currently considering the optimal modality of cooperation with EPPO.

In the previous period, the Supreme Public Prosecutor’s Office submitted to the Ministry of Justice the text of a Memorandum of Cooperation between the EPPO and the Republic of Serbia. The text of the Memorandum was deemed unacceptable because it conflicted with international treaties and our national legislation. The submission of an extradition request cannot be carried out by the EPPO, but only by the relevant state.

The Ministry of Justice proposes to hold an online meeting with the EPPO in January or February 2026 to discuss the details of cooperation.

Nevertheless, the Ministry of Justice cooperates with the EPPO on the basis of letters rogatory, which are submitted via contact points (public prosecutor’s offices) to the Ministry of Justice. The Ministry of Justice then forwards these letters to the competent courts and public prosecutor’s offices for further action. All letters rogatory submitted to date have been complied that is, the request was granted.

Mutual legal assistance in criminal matters takes place continuously.

Supreme Public Prosecution Office

During 2025, the Department for International Cooperation and Legal Assistance of the Supreme Public Prosecution formed 655 cases in the field of international legal assistance and cooperation, including 483 new requests, of which in 219 cases requests were sent by national public prosecutors to competent authorities in other countries, while in 264 cases assistance was sought from national prosecutions by foreign judicial authorities, directly from the prosecution offices or through the Ministry of Justice of the Republic of Serbia.

The cooperation of the Republic of Serbia with Eurojust that was successfully ongoing through the Office of the Liaison Prosecutor for Serbia at Eurojust opened in March 2020 in Eurojust`s headquarters, successfully continued through the Liaison Prosecutor in 2025.

Total number of requests the work on which was ongoing in 2025 was 313, including 223 requests from the previous reporting period and 90 newly registered requests.

In the reporting period, the representatives of the public prosecution office of Serbia participated in 13 coordination meetings organized by Eurojust. The meetings were mostly related to the coordination of further actions in ongoing cases and to the consideration and analysis of the results achieved in the work of the ongoing joint investigation teams.

One joint investigation team in which representatives of Serbian competent authorities were taking part was ongoing in 2025, and it was formed in previous reporting period. No new JITs were established in 2025.

The Supreme Public Prosecution Office of the Republic of Serbia has a contact point for the European Judicial Network, who, along with his associates, actively participates in the work of this network, together with the contact points from the Ministry of Justice and from the Supreme Court.

In 2025, the EJN contact point from the Supreme Public Prosecution Office of the Republic of Serbia continued to the provide support and information related to international legal assistance cases upon requests of foreign EJN contact points and other legal practitioners who obtained

contact information through this network. It also participated at the EJN meetings, as well as in the work of the EJN working groups, such as the Sub-group on judicial training.

In the reporting period, the EJN contact point from the Supreme Public Prosecution Office of the Republic of Serbia participated at the 46. Regular meeting of the EJN, held on 13th February 2025 in the Hague, the Netherlands, together with the EJN contact points from the European Union member states and from the candidate countries/ non-EU countries. At this meeting the EJN contact points presented the general developments in their countries in the field of international judicial cooperation.

The EJN contact point from the Supreme Public Prosecution Office of the Republic of Serbia participated also at the 64. Plenary Meeting of the EJN held from 7-9 May 2025 in Warsaw, Poland and at the 65. Plenary Meeting of the EJN held from 5-7 November in Copenhagen, at which specific topics of international legal assistance and cooperation were presented and then discussed in the working groups. In addition, both regular and plenary EJN meetings also fostered exchange of best practices and sharing of contact information among the participants and thus enhanced their networking.

Furthermore, the EJN contact point participated at the 8th meeting between the EJN Contact Points in the EU Member States and in the Western Balkans, held on 12 June 2025 in Budva, Montenegro, which focused on trafficking in human beings and provided platform for enhancing of regional cooperation, as well as cooperation between the EU and non-EU countries. Also, the representatives of the public prosecution office of the Republic of Serbia participated in the regional EJN meeting, organized by the Ministry of Justice of Hungary in Balatonszemes from 01-03.10.2025. on illegal immigrant smuggling, which included the representatives from Austria, Croatia, Romania, Slovakia, Slovenia and Serbia.

According to the statistics presented by the EJN Secretariat at the 46. Regular meeting of the EJN on 13th February 2025, on „EJN cases 2023-2024 involving EU and Western Balkans“, in the Western Balkans Serbia had the biggest number of cases with EU member states.

- Please provide an update as regards establishing cooperation with the EPPO and the state of play of the draft working arrangement.

Ministry of Justice

As regards cooperation with the European Public Prosecutor's Office (EPPO), the analysis of the modalities of cooperation with the EPPO was carried out in 2025 through the project "IPA 2019, EU for Fight against Corruption and for Fundamental rights." The Ministry of Justice is currently considering the optimal modality of cooperation with EPPO.

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prosecutor's offices for further action. All letters rogatory submitted to date have been complied that is, the request was granted.

Mutual legal assistance in criminal matters takes place continuously.

- Please provide an update about the work of the Serbian liaison prosecutor at Eurojust in The Hague in the past period, including about the practical effects of the cooperation agreement between Serbia and the Eurojust on fighting domestic crime. Please provide the number of requests and cases opened as well as information on the main area of focus of cases.

Supreme Public Prosecution Office

The cooperation of the Republic of Serbia with Eurojust that was successfully ongoing through the Office of the Liaison Prosecutor for Serbia at Eurojust opened in March 2020 in Eurojust`s headquarters, successfully continued through the Liaison Prosecutor in 2025.

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One joint investigation team in which representatives of Serbian competent authorities were taking part was ongoing in 2025, and it was formed in previous reporting period. No new JITs were established in 2025.

Liaison Prosecutor for Serbia at Eurojust participated in 2025 in numerous conferences, seminars and thematic meetings held in Eurojust and disseminated a number of reports and notes related to best practices and new trends in international cooperation to national authorities competent for specific topics, assessing the documents as relevant for further improvement of the work in relevant areas.

The statistics indisputably demonstrate the trend of intensification of cooperation, both quantitatively and qualitatively, since Liaison Prosecutor for Serbia has been seconded to Eurojust, enabling exchanges initiated by both Members states and Serbia. The main type of assistance provided through Eurojust remains facilitation of execution of MLA request, but it extends beyond to resolutions of various other issues such are in particular jurisdictional issues, *ne bis in idem* and/or transfer of proceedings. The presence of the Liaison prosecutor at Eurojust`s headquarters is of great added value in the process of promoting international cooperation and accelerating and providing international legal assistance more effectively as it enables more direct cooperation in cases of serious cross-border and organized crime, participation in operational and strategic meetings at Eurojust, as well as coordination meetings aimed at considering the creation of joint investigative teams, which in practice have proven to be an extraordinary coordination tool investigating and promoting the effectiveness of international cooperation.

Prosecution service of the Republic of Serbia expects that the presence of the Liaison prosecutor will additionally enhance coordination and cooperation in prosecuting serious cross-border crime between Serbian judicial authorities with their colleagues in EU MS in prosecuting serious cross-border crime in the EU, enabling Serbian authorities to exchange information and evidence faster with their foreign counterparts and to benefit from all the practical cooperation tools offered through Eurojust, all of which is expected to contribute to an overall improvement of the fight against transnational crime and conduct of cross border investigations.

- Please update on the state of play as regards the (comprehensive, cross-sector) alignment of the legislation with the EU *acquis* and on follow-up actions to strengthen capacities for cooperation, after finalising the analysis of the administrative, budgetary and training needs.

Ministry of Justice

Regarding judicial cooperation in criminal matters, during 2026 work will commence on drafting two laws: 1) The Law on Mutual Legal Assistance in Criminal Matters with EU Member States, which will enter into force upon accession to the EU; 2) The Draft Law on Amendments and Supplements to the Law on Mutual Legal Assistance in Criminal Matters (or a completely new law, depending on the scope of amendments).

The analysis of the normative framework in the area of mutual legal assistance in criminal matters was conducted through the GIZ project, and serves as the basis for the amendments to the two aforementioned laws. These laws are to be adopted by the end of 2026.

Capacity building is essential, so that after the adoption of planned laws, trainings and workshops will be conducted at the beginning of 2027.

Day 2

6. Fight against corruption

6.1. Law on the prevention of corruption (implementation) and other legislation (Law on access to public information; Law on financing of political activities; Law on whistle-blower protection)

- Please provide an update on the state of play concerning the amendments to the Law on prevention of corruption, with a view to align it to the GRECO recommendations from the fifth round of evaluations including expanding the remit of the Law to cover all persons with top executive functions, including the Prime Minister's and Deputy Prime Ministers' chiefs of cabinet as well as special and government advisers.

Ministry of Justice

The Ministry of Justice has prepared the Draft Law on Amendments and Supplements to the Law on Prevention of Corruption, which also includes alignment with GRECO recommendations. The text of the amendments has been submitted to the European Commission on December 18th 2025, for an expert opinion. Following the receipt of this opinion, the national legislative procedure will be conducted. According to the Work Plan of the Government of the Republic of Serbia, the adoption of this law is expected by the end of the 1st quarter of 2026.

Please find attached the Second Compliance Report Assessing the implementation by the Republic of Serbia of the Group of States against Corruption (GRECO) recommendations from Fifth Evaluation Round.

- Please clarify whether mechanisms for asset declaration verification and conflict of interest control require further legislative adjustments, and if so, what the planned timeline is.

Ministry of Justice

The Draft Law on Amendments and Supplements to the Law on Prevention of Corruption contains provisions related to this subject, which foresee significant normative improvements in this area. According to the Work Plan of the Government of the Republic of Serbia, the adoption of this law is expected by the end of the 1st quarter of 2026.

Agency for Prevention of Corruption

It should be considered that the Agency may also obtain data on the accounts of other persons from the Report, without their consent (Art. 36 of the Law on Prevention of Corruption); Also, that the Report contains a field "other data relevant for the implementation of the Law on Prevention of Corruption".

The Agency has sent an initiative to the competent Ministry of Justice for amendments to the Law on the Prevention of Corruption, on the basis of which the Draft Law on Amendments to the Law on the Prevention of Corruption has been prepared.

The proposed changes and amendments are:

- In Art. 2 of the Law, in the part relating to the meaning of certain terms, specifically the term public official (Art. 2 of the Law - in accordance with the GRECO recommendation)

- in Art. 42 of the Law, in the part relating to informing the Agency (in accordance with the GRECO recommendation)

- in Art. 55 of the Law, in the part relating to restrictions upon termination of public office,

- in Art. 56 of the Law, in the part relating to the prohibition of performing another public office,

- in Art. 78 of the law, in the part relating to the initiation of proceedings (in accordance with the ODIHR recommendations) - in Art. 85 of the law, in the part relating to the public publication of decisions (in accordance with the ODIHR recommendations).

- Please provide an update on the state of play of the implementation of the Law on access to public information and any plans on its further amendments in line with OECD/SIGMA recommendations.

Ministry of Public Administration and Local Self-Government

The Government of RS will make a decision regarding further activities related to resolving the problem of systemic abuse of requests and drastic increase of appeals in access to information of public importance. In case of amendments to the Law on information of public importance, Serbia will consult the European Commission on the draft amendments following public consultations and prior to adoption at government level.

Commissioner for Information of Public Importance and Personal Data Protection

In 2025, 17,462 cases were received in the area of free access to information of public importance. 16,510 cases were carried over from the previous period, which means that in 2025, there were a total of 33,972 cases in this area. A total of 16,571 were resolved.

In 2025, a total of 8,812 complaints were received. 12,306 unresolved complaints were carried over from the previous period, which means that in 2025, a total of 21,118 complaints were pending. In 2025, a total of 9,817 complaints were resolved. In 2025, the Commissioner ordered the provision of information in 1,023 cases. Of the 1,023 decisions made, 418 complaints were merged during the resolution, so that 605 decisions on the order were made.

In the period from 1.1.2025. - 30.11.2025. The Commissioner ordered the provision of information in 988 cases. In the 988 decisions issued, 417 complaints were merged during the resolution process, resulting in 571 decisions being issued on the order. Of the 571 decisions, by 9.1.2026, 152 unexecuted decisions were recorded, which means that the percentage of execution is currently 73.4%.

In 2025, a total of 43 proposals for administrative enforcement were submitted. In 2025, 9 enforcement decisions and one fine of 50,000.00 dinars were issued. In 2025, 502 misdemeanor orders were issued to authorized individuals for failing to respond to requests for access to information. In 2025, 21 requests for initiating misdemeanor proceedings were submitted for violating the provisions of the Law on Free Access to Information of Public Importance. In 2025, the Commissioner received a total of 4,195 lawsuits from the Administrative Court for a

statement. Of that number, 2,319 lawsuits were against the administration's silence. The Commissioner provided 2,521 responses to the lawsuit.

From January 1, 2021, until December 31, 2025, the Commissioner obliged the first-instance authorities to pay a total of 82,389,350.00 dinars for the costs of the procedure.

Abuse of the right to access information remains a fundamental problem in exercising the right to access information, which continues to significantly hinder the work of the Commissioner and his office, which is why the Commissioner cannot direct his capacities to resolving complaints from persons who really need information, nor can he adequately devote himself to other obstacles and problems in exercising this right, such as journalistic cases, unexecuted journalistic decisions, cases in which information of importance to the environment is sought, capital investments, budget spending, etc., as well as the failure to publish Information directories, etc. Therefore, the Commissioner works continuously and reminds of the necessity of urgent amendments to the Law on Free Access to Information of Public Importance, all to resolve the problem of abuse of the right.

- Please provide an update on the timeline of the amendment to the Law on financing of political activities and the Criminal Code to align with ODIHR recommendations. The Action Plan of the National Anticorruption Strategy stated that an analysis of ODHIR recommendations aimed at amending the Law on financing of political activities and an analysis of irregularities in the financing of political activities within the competence of the Agency for the prevention of corruption would be completed by 4Q 2025 – please can you provide an update? Could you please share these analyses with us?

Ministry of Justice

Ministry of Justice drafted the Law on Amendments and Supplements to the Criminal Code and public debate was held in the period October 1st – November 1st 2024. Bearing in mind the significant public interest, an additional round of public debate was held from 10 September to 1 October 2025. The Draft Law on Amendments and Supplements to the Criminal Code was subsequently sent to the European Commission on 15 October 2025. The clarification requests were sent by the European Commission on 11 November 2025 and the Ministry of Justice submitted all replies on 14th January 2026. ODIHR recommendations are still being considered. The adoption of the Law on Amendments and Supplements to the Criminal Code is planned for the 1st quarter 2026.

Agency for Prevention of Corruption

In the Draft Action Plan for the Implementation of the National Anti-Corruption Strategy 2026-2028, for activities 1.2.12 (Development of an analysis of ODIHR recommendations with the aim of amending the Law on Financing of Political Activities) and 2.8.1. (Develop an analysis of irregularities in the financing of political activities within the scope of the competence of the Agency for the Prevention of Corruption), the proposed deadline is the 1st quarter of 2026, while for amendments to the Law on Financing of Political Activities in accordance with the ODIHR recommendations and analysis, the deadline is the 2nd quarter of 2026. Regarding the

obligation to prepare appropriate analyses related to irregularities in the Law on Financing of Political Activities within the competence of the Agency for the Prevention of Corruption and in accordance with the recommendations of the ODHIR, we inform you that this analysis is currently being prepared and we expect that the document with its findings and conclusions will be prepared during 2026, as foreseen in the new Draft Action Plan for the Anti-Corruption Strategy 2026-2028. Since the Ministry of Finance is also obliged to prepare appropriate analyses in relation to the aforementioned Law, the same deadline is defined for them in the Draft Action Plan for the Fight against Corruption. The Agency will certainly be in contact with the Ministry when preparing these analyses.

As for the timeline when we expect the amendment of the law itself, we all agree that this is expected in the near future, considering previous announcements from various institutions and working groups, but we, as the Agency, cannot comment on this issue.

Ministry of Finance

The activity relating to the preparation of an analysis of the recommendations of the ODIHR concerning amendments to the Law on Financing of Political Activities and an analysis of irregularities in the financing of political activities within the competence of the Agency for the Prevention of Corruption has been incorporated into the Draft Action Plan for the Implementation of the National Anti-Corruption Strategy for the period 2026–2028. The deadline for the completion of this activity is set for the first quarter of 2026, whereas the adoption of amendments to the Law on Financing of Political Activities is envisaged for the second quarter of 2026.

- Please inform us of the steps taken and results achieved in the implementation of the Law on lobbying. What is the current state of play as regards amendments to the Law in particular to extent its scope which is currently limited to formal and written contacts (previously you reported that this was planned for 2025)?

Ministry of Justice

The Ministry of Justice regularly monitors the implementation of the Law on Lobbying within its jurisdiction. The Ministry of Justice has prepared the Draft Law on Amendments and Supplements to the Law on Lobbying. The text of the amendments has been submitted to the European Commission on December 18th 2025, for an expert opinion. Following the receipt of this opinion, the national legislative procedure will be conducted. The adoption of the Law on Amendments and Supplements to the Law on Lobbying is planned for the 1st quarter of 2026.

Agency for Prevention of Corruption

The Agency, with the support of the General Secretariat of the Government of the Republic of Serbia, implemented the first online training for newly elected ministers in the Government on May 27, 2025, entitled "Integrity Standards of Public Officials through the Legal and Institutional Framework for Preventing Corruption". The training presented topics related to the implementation of the Law on the Prevention of Corruption and the Law on Lobbying.

The Agency, with the support of the OSCE Mission to Serbia, organized an expert meeting on June 9, 2025, on the topics: The Importance of Corruption Risk Assessment in Regulations and Lobbying in the Republic of Serbia, which was attended by Nenad Vujić, Minister of Justice in the Government of the Republic of Serbia, Jorgovanka Tabaković, Governor of the National Bank of Serbia, Carolina Hidea, Acting Head of the OSCE Mission to Serbia and representatives of ministries of the Government of the Republic of Serbia and other state bodies,

The Agency has prepared a new training in the field of corruption prevention - Training for lobbyists, which is available from December 9, 2025 on the Agency's account - distance learning application. The training is intended for elected, appointed and nominated persons, employees of public authorities or otherwise engaged persons, as well as persons whose election, appointment or nomination is approved by a public authority, and who participate in the process of preparing and adopting laws, other regulations and general acts or may influence the content of laws, other regulations and general acts.

The aim of the training is to improve the knowledge of participants about the obligations of public officials, employees and engaged persons in public authorities in the lobbying process. The training is interactive and requires participants to be engaged during their work.

The Agency, within the framework of its legally established competences, organized the eighteenth Training for Lobbyists on December 11 and 12, 2025. All five candidates, who began testing on December 15, 2025, successfully passed the knowledge test.

The Agency, in cooperation with the Office of the Prime Minister of the Republic of Serbia and the General Secretariat of the Government, implemented another training course on December 16, 2025, entitled "Integrity Standards of Public Officials through the Legal and Institutional Framework for Preventing Corruption", which completed the training cycle for ministers. The training covered topics related to the implementation of the Law on the Prevention of Corruption and the Law on Lobbying.

The Agency submitted initiatives to amend the Law on Lobbying to the authorized proposer of the law, the Ministry of Justice, in August 2023, and then an amendment to the initiative in September 2025.

The Draft Law was submitted to the European Commission for its oppinion on 18 December 2025, as the European Commisssion requested that the law be provided prior to its addoption in order to issue additional feedbeck.

- Please inform us about the timeline for the amendments of the Law on whistle-blower protection to align with the EU Directive. The Action Plan for the National Anticorruption Strategy includes an analysis of the enforcement and compliance of the Whistleblowing Protection Law with the EU Directive 2019/1937 on the protection of whistleblowers who report breaches of Union law, and analysis of laws adopted on the basis of the Directive in the EU member states. The deadline was 4Q 2025. Was the analysis conducted and could you please share it with us?

Ministry of Justice

Once the work on the criminal legislation as well as on legislation set up in the Reform Agenda is finalised, the Ministry of Justice will set up the calendar of future legislative activities, including the Law on Whistle-Blower Protection. During 2026 the Republic of Serbia will analyse the implementation of the current law and it is expected that, on the basis of the analysis, amendments will be adopted by the end of 2026.

Additional questions for Rule of Law Report:

- Please provide further information on the effectiveness of practical measures already taken to enhance the transparency of the decision-making process in practice (lobby registers, legislative footprints), including level of sanctions applied.

Agency for Prevention of Corruption

The Agency has no data.

- Regarding whistleblowing, please provide details on how many reports on corruption cases were received, followed-up to, and sent to the competent law enforcement authorities. What is the overall value of whistle-blower reports for the detection of corruption? How many protection statuses were granted?

Ministry of Justice

Implementation of the Law on Protection of Whistle-blowers that was adopted in 2014 is regularly monitored through the preparation of the Ministry of Justice annual reports. Monitoring of the implementation of the Law on Protection of Whistle-blowers has been continued, within the framework of the Revised AP 23, subchapter Fight against Corruption. The Annual Report on the Implementation of the Law on Whistle-blowers for 2024 was prepared and published on the website of the Ministry of Justice in June 2025.

Supreme Court

The Supreme Court will submit the requested statistical data after the preparation and adoption of the Annual Report on the Work of the Courts for 2025.

- What is the state of play of the investigation into the canopy collapse at Novi Sad? *[Please also see questions under agenda point 8]*

The Public Prosecutor's Office for Organized Crime

In December 2024 Public Prosecutor's office for Organized Crime initiated preliminary investigation proceeding and on August 1, 2025 initiated formal investigation against 14 suspects concerning the monitoring of financial flows on the project "Modernization and Reconstruction of the Hungarian-Serbian Railway Line on the route Novi Sad - Subotica - State Border (Kelebija)". This investigation was initiated against two former Ministers of Construction, Transport and Infrastructure (Vesić and Momirović), a former acting Assistant Minister in this ministry, the General Director and Investment Manager of the

company "Infrastruktura železnice Srbije" (Serbian Railway Infrastructure), Director of the Institute for the Protection of Cultural Monuments of the City of Novi Sad, as well as responsible persons in private companies engaged in the above-mentioned project.

By the order on investigation public officials were charged for obtaining a material benefit for the contractor 'CRIC – CCCC' in the currently established value of at least $18,759,287, and caused damage to the budget of the Republic of Serbia in the amount of $115,558,520.43, representing the difference between the financial obligations assumed by the budget of the Republic of Serbia and the contract price from the Commercial Contract on Modernization and Reconstruction of the Hungarian-Serbian Railway Line on the route Novi Sad - Subotica - State Border (Kelebija).

In the course of investigation suspects were interrogated and part of a large number of witnesses. In addition, POOC issued of the order for expert witness opinions (economic-financial and construction).

In the criminal proceeding initiated by the Higher Prosecutor's Office in Belgrade against 3 defendants (Investment manager of the public company "Infrastruktura železnice Srbije" (Serbian Railway Infrastructure)" and two other defendants) related to the event of canopy collapse on the Novi Sad Railway Station, the Higher Public Prosecutor's Office in Belgrade on March 4, 2025 raised indictment.
After initiation of this investigation, the Supreme Public Prosecutor issued Ruling on Substitution of this case to the Prosecutor's Office for Organized Crime. However, due to objection of the Higher Prosecutor's Office in Belgrade, this Ruling became final on March 4, 2025, following the raise of indictment. Therefore, the Public prosecutor's Office for Organized Crime is currently handling this case.
The proceeding of examining the indictment before the Higher court in Belgrade is ongoing.

Supreme Public Prosecution Office

On 30 December 2024, the Higher Public Prosecution Office in Novi Sad filed an indictment against 13 defendants for the criminal offense of Grave offenses against general safety under Article 288 paragraph 2 of the CC. In the process of examining the indictment, the panel of the Higher Court in Novi Sad on 11 April 2025 returned the indictment for the purpose of supplementing the investigation.
In accordance with that decision, the investigation was supplemented and on 16 September 2025 the indictment was filed again against the same 13 defendants. In the process of examining the indictment, the Higher Court in Novi Sad found that the charges against 6 persons are unfounded and the criminal proceedings were discontinued in relation to them. The Higher Prosecution Office in Novi Sad will appeal on this ruling.
The indictment against 7 persons was confirmed by the same ruling.

6.2. Alignment with GRECO recommendations

- Please inform us of the activities taken to address all outstanding GRECO recommendations, and in particular those from the Fifth round of evaluations of GRECO.

Ministry of Justice

Concerning the Fifth round of GRECO evaluations, in the Report adopted in June 2024, GRECO concluded that Serbia has implemented satisfactorily one of the twenty-four recommendations set out in the Fifth Round Evaluation Report, while ten have been partially implemented. The Republic of Serbia provided additional information regarding the implementation of the remaining recommendations on 31st December 2025. Please find attached the Second Compliance Report Assessing the implementation by the Republic of Serbia of the Group of States against Corruption (GRECO) recommendations from Fifth Evaluation Round.

6.3. Anti-Corruption Council (Government decision regulating the work of the Anti-Corruption Council, cooperation with prosecution services and with the Government, follow-up to the 2024 annual report recommendations)

- Please provide an update on the Government's efforts to establish a constructive relationship with the Anti-corruption Council, ensuring its systematic consultation and taking the Council's recommendations into account, as per the expectations outlined in the respective interim benchmark.

The Anti-Corruption Council

Unfortunately, the Council does not have updated information on the Government's efforts to establish cooperation because the Government did not contact the Council in the specified period on the above-mentioned issues.

The government did not contact the Council regarding the appointment of new members to fill the capacity, even though, as AP23 found, the Council submitted proposals as required by the Rules of Procedure of the Council several times in the past years.

The Council also submitted reports on systemic corruption with recommendations and conclusions and did not receive any feedback from the Government of the RS.

The Council did not meet with the new Prime Minister, which was the usual practice before.

The Council can conclude that there were no changes on these issues.

Supreme Public Prosecution Office

The Anti-Corruption Council submits reports to the Supreme Public Prosecution Office, which then forwards them to the competent prosecution offices for further action. Annually, the Supreme Public Prosecution inform the Council about the actions of the competent prosecutor's offices according to their reports.

All reports submitted to the Supreme Public Prosecution Office were forwarded to the competent prosecutor's offices.

6.4. Cooperation and coordination mechanisms in the prevention and the fight against corruption (implementation of National Anti-corruption Strategy and preparation of action plan for 2026-2028)

- What is the state of play regarding the implementation of the National Anti-Corruption Strategy and the accompanying Action Plan 2024-2025?

Agency for Prevention of Corruption

The Strategy contains general and five specific objectives, as well as 30 measures whose implementation should contribute to the achievement of the specific objectives. The Action Plan also contains 143 activities, of which 14 are due for implementation in the fourth quarter of 2024, 2 in the first quarter of 2025, 14 in the second quarter of 2025, 8 in the third quarter of 2025, and 104 in the fourth quarter of 2025, while the implementation of one activity is linked to the period of holding elections, should any occur during the validity of the Action Plan.

From the beginning of the implementation of the Action Plan until the end of the third quarter of 2025, out of 38 activities that were due for implementation, the Agency determined that 18 (47.37%) activities were implemented, 17 (44.74%) activities were not implemented, and 3 (7.89%) activities were not assessed, as additional information was requested from the responsible entities in order to assess their implementation status.

Data collection is underway for activities whose implementation is due by the end of the fourth quarter of 2025. The Agency will prepare a report on the implementation of all activities, measures, and specific objectives from the Action Plan for the period 2024–2025 by the end of March 2026, at which time it will submit the report to the National Assembly for consideration.

- Please describe the state of play in establishing the high-level coordination mechanisms based on the National Anti-Corruption Strategy for the period 2024-2028, and the schedule of the meetings. Please inform about the timeline for the reporting by the Agency for the Prevention of Corruption on the implementation of the Action Plan.

Ministry of Justice

The Strategy envisions that the institutional framework for monitoring its implementation will include two mechanisms: a political one, comprising a governmental working body, and a professional one, represented by the Agency for the Prevention of Corruption.

The members of the working body will be of the highest political level, and the body will be chaired by the Prime Minister, which will ensure an effective influence on the implementation of the Strategy. The working body will meet at least twice a year and analyze the results of the implementation of the Strategy based on the reports of all the relevant authorities that participate in its implementation. In its minutes, the working body defines the conclusions and recommendations to the competent authorities on coordination in order to successfully implement the activities, and reports the results of the implementation to the Government every six months. The recommendations of the working body will be published on the website of the Ministry of Justice. The tasks and functioning of the working body are regulated in more detail by the Rules of Procedure. Administrative and technical support to the working body is provided by the Ministry of Justice. The

working body reports to the Government on the results of the implementation of the Strategy no later than 120 days after the end of every third calendar year from the date of adoption, and submits a final report to the Government no later than six months after the end of the implementation of the Strategy. The governmental working body will be established upon the adoption of the Action Plan for the period 2026-2028 for the implementation of the National Anti-Corruption Strategy for the period 2024-2028 that is planned by the end of 1st quarter of 2026.

The Agency for the Prevention of Corruption has an established mechanism for monitoring the implementation of strategic documents, and the Instruction on Reporting on the Implementation of Strategic Documents, more closely regulates the manner in which responsible entities report to the Agency for the Prevention of Corruption on the implementation of activities indicated in strategic documents. All authorities are required to designate a person to handle reporting and to notify the Agency thereabout. The Agency for the Prevention of Corruption will, in accordance with the Law on the Prevention of Corruption, supervise the implementation of the Strategy, submit to the National Assembly a report on the implementation with recommendations for action and give the responsible entities recommendations on how to eliminate shortcomings in the implementation of the Strategy and, if necessary, initiate amendments to the Strategy.

Agency for Prevention of Corruption

As defined by the National Anti-Corruption Strategy (page 40), within Section 5 Institutional Framework and Implementation Monitoring Plan, a Working Body is to be established for the coordination of the implementation of the National Strategy. The Working Body is to be formed by a Government decision, no later than 30 days from the date of adoption of the National Strategy, for the duration of its validity. Administrative and technical support to the Working Body is to be provided by the Ministry of Justice.

The Agency has no information on the establishment or operation of the coordination body.

In accordance with the Law on the Prevention of Corruption, the Agency for Prevention of Corruption will monitor the implementation of the National Strategy and submit to the National Assembly a report on its implementation, including recommendations for further action, and will issue recommendations to the responsible entities.

The Agency has prepared periodic quarterly reports on the implementation of the Action Plan for the 2024–2025 period, covering activities from the fourth quarter of 2024 and the first, second, and third quarters of 2025.

Data collection is underway for activities whose implementation is due by the end of the fourth quarter of 2025, and report will be prepared. The Agency will prepare a report on the implementation of all activities, measures, and specific objectives from the Action Plan for the period 2024–2025 by the end of March 2026, at which time it will submit the report to the National Assembly for consideration.

- What are the financial gaps to fully implement the Action Plan within the set timeframes?

Ministry of Justice

The Action Plan for the period 2026-2028 for the implementation of the National Anti-Corruption Strategy for the period 2024-2028 has been budgeted and includes an estimate of the financial resources required for its implementation.

6.5. State of play regarding (a) conflict of interest cases, (b) asset declaration and verification system, (c) political activity financing, (d) access to information of public importance, (e) code of conduct for civil servants

- Please inform about whether there is follow-up monitoring of conflict of interest cases to ensure that the Agency's decisions are implemented. Are the cases reported to the High Civil Service Council? What is the number and degree of enforced sanctions on conflict of interest cases in 2025?

Agency for Prevention of Corruption

Follow-up monitoring of conflict of interest cases to ensure that the Agency's decisions are implemented

During 2025, 48 decisions were issued rejecting a request for consent to perform another public function, or to perform another job or activity.

In 26 procedures where the decision is final, 26 public officials acted in accordance with the decision.

In 12 procedures, the decision is not final, because in 3 cases the appeal procedure is ongoing, while in 9 cases the delivery of the decision to the public official is in progress.

In 10 procedures, which are final, the deadline for the public official to act in accordance with the decision is ongoing.

During 2025, 14 measures with an order were issued to a public official and 2 decisions determining the termination of another public function by force of law.

Of these, in 8 procedures in which the decisions in which the measure was issued were final, 8 public officials acted in accordance with the measure issued.

In 6 procedures, the decision is not final, in 4 procedures, the delivery of the decision to the public official is in progress, and in 2, the appeal procedure is in progress.

In 2 procedures in which decisions were made determining the termination of another public function by force of law, the decisions are not final because the delivery of those decisions to the public officials is in progress.

The Agency conducts proceedings to decide on the existence of a violation of the Law on the Prevention of Corruption against Public Officials and, in accordance with the provisions of Art. 56, paragraph 8 and Art. 84 of that Law, delivers to the competent authority a decision establishing a violation of the law, upon the finality of that decision.

We note that the competence of the High Civil Service Council is prescribed by the provisions of Art. 164 of the Law on Civil Servants.

During 2025, the Agency, by implementing the Law on the Prevention of Corruption, issued a total of 82 decisions establishing a violation of that law and imposed 73 warning measures, 6 measures of public announcement of the decision on a violation of the law, one

measure of public announcement of a recommendation for dismissal from public office and two decisions establishing the termination of another public office within the meaning of Art. 56 of the Law. Of these, 11 measures were imposed on public officials who were in a situation of conflict of interest.

- Please inform whether the planned analysis of the effectiveness and efficiency of sanctions for the criminal offence of failing to declare assets and income or providing false information regarding assets and income has been carried out by the deadline stipulated in the Action Plan (4Q 2025), and kindly share it with us.

The Ministry of Justice

The planned analysis of the effectiveness and efficiency of sanctions for the criminal offence of failing to declare assets and income or providing false information regarding assets and income will be carried out through the Action Plan for the period 2026-2028, aimed at implementing the National Anti-Corruption Strategy 2024-2028 that will be adopted no later than the first quarter of 2026.

Agency for Prevention of Corruption

The action plan stipulates that the responsible entity for the implementation of this activity is the Ministry of Justice, and they should be asked to answer the above question.

- Please inform about the number of asset-declarations made in 2025 and the number of in-depth checks conducted. What ratio of submitted declarations undergoes in-depth checks?

Agency for Prevention of Corruption

Number of submitted Reports on Assets and Income in 2025 – 5322

The number of in depth verification is determined by the Annual Verification Plan adopted by the Director of the Agency, for 2025 - 305 public officials, the number of in depth verifications also includes the number of extraordinary inspections - 12 and cases that were "carried over" from previous years.

Verification involves the analysis of all submitted Reports for all persons from the Reports and data obtained from other public authorities (theAgency for Business Register, the Tax Administration, National Bank of Serbia , The Republic Geodetic Authority, The Central Securities Depository and Clearing House (CSD), the Ministry of Internal Affairs), legal and natural persons.

- Please inform about any sanctions issued by the Agency for the Prevention of Corruption for non-compliance regarding asset declarations of public officials. Please inform about the human and financial capacities of the Agency for Prevention of Corruption that are additionally required to improve the track records.

Agency for Prevention of Corruption

In the area of property and income control, the Agency imposed 218 warning measures, 7 measures of public announcement of the decision on violation of the law, 118 misdemeanors and 9 criminal charges/reports were filed with the competent prosecutor's office, as well as 7 reports to other state bodies due to suspicion of the commission of a criminal offense within the jurisdiction of that body.

Sector for the Control of Assets and Income needs to be strengthened with human resources.

Of the 23 employees provided for by the Regulation on Systematization in the Agency, 13 positions have been filled in the Sector for the Control of Assets and Income, which deals with matters related to the declaration of property of public officials.

Strengthening human capacities does not only represent the numerical status of employees in the above-mentioned positions, but also their strengthening through professional training, which employees use to improve their competencies necessary for performing the tasks of their workplace, both through training organized by the National Academy of Public Administration, and through training organized by other organizers, domestic and foreign bodies and organizations.

- On political party financing, could you please inform on whether the Agency for the Prevention of Corruption monitored the elections at local level in 2025? Did it have observers on the ground? Is it preparing the report on the financing of political actors in relation to these elections? Please report on any corrective or remedial actions taken by the Agency in 2025 in this area. Could you please inform about how many and what reports has the Agency published stemming from its obligations in the field of monitoring of financing of political activities during 2025?

Agency for Prevention of Corruption

In 2025, local elections were held in Zaječar, Kosjerić, Negotin, Mionica and Sečanj. The Agency monitored all local elections in 2025 and on that occasion acted during the election campaigns upon reports and ex officio due to suspicions of possible violations of the Law on Financing of Political Activities.

Local elections for the elections of councilors to the Assembly of the City of Zaječar and the Assembly of the Municipality of Kosjerić were held on June 8, 2025. and during the election campaign, the Agency organized and conducted monitoring of the election activities of political entities that participated in the aforementioned elections. In this regard, the Agency engaged a total of two field observers (one field observer each to monitor the election campaign in Zaječar and Kosjerić). A central coordinator from the Agency has also been engaged to monitor and control the work of field observers.

In accordance with the Law on Financing of Political Activities, political entities participating in an election campaign are obliged to submit preliminary and final reports on election campaign expenses to the Agency, and the Agency is obliged to carry out control of these reports in accordance with the previously adopted control plans and publish the results and findings of the control on its website within the legal deadline. The control plans for election campaign expense reports for the aforementioned elections have been published on the Agency's website and are available at the link https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti#

The report on the control of the financing of the costs of political entities for the election of councilors of the City Assembly of Zaječar and the Municipal Assembly of Kosjerić in 2025 was prepared in accordance with the Law on Financing of Political Activities and was published on the Agency's website, which is available at the link https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti#

The elections for councilors of the Municipal Assemblies of Negotin, Mionica and Sečanj were held on November 30, 2025. The Agency will, in accordance with the provisions of the Law on Financing of Political Activities and based on the adopted Control Plan

published on the Agency's website, carry out control of the final and preliminary reports on the election campaign costs of political entities. The report on the audit of the report will be published on the Agency's website in accordance with the Law within 120 days from the date of expiry of the deadline for submitting the final report on election campaign expenses.

Based on the reports submitted during the election campaign regarding the elections for councilors in the Zaječar City Assembly and the Kosjerić Municipality Assembly, the Agency issued four decisions, in which in two cases it was determined that there was a violation of the Law on Financing Political Activities in Election Campaigns and warning measures were imposed, while in two cases no violation of this law was determined. These decisions were published on the Agency's website and are available at the link https://www.acas.rs/cyr/pages/lokalni_izbori2025-_zaje%C4%8Dar_i_kosjeri%C4%87-_odluke_po_prijavama

Regarding these elections, the Agency, ex officio, based on the reports of field observers, filed four requests with the competent misdemeanor court against political entities for initiating misdemeanor proceedings for violating the Law on Financing of Political Activities, because the advertising material they distributed during the election campaign was not marked in accordance with this law.

Addidtionaly, based on the reports submitted regarding the election campaign regarding the elections held in Negotin, Mionica and Sečanj, the Agency issued decisions, which in three cases established that there was a violation of the LFPA in the election campaign and which, among other things, constitute the basis for submitting a request to initiate misdemeanor proceedings, while in one case it was not established that there was a violation of this law. All decisions are published on the Agency's website and are available at the link https://www.acas.rs/cyr/pages/lokalni_izbori2025-_negotin,_mionica_i_se%C4%8Danj-_odluke_po_prijavama

In addition, the Agency has published on its website a register of the status of procedures conducted on the basis of submitted applications in the election campaign, and the register is available at the link https://www.acas.rs/cyr/pages/lokalni_izbori2025-_negotin,_mionica_i_se%C4%8Danj-_odluke_po_prijavama

Against political entities that have not submitted reports on election campaign expenses, the Agency has filed a total of 36 requests for the initiation of misdemeanor proceedings, of which 26 requests were filed for failure to submit final reports on election campaign expenses and 10 requests were filed due to failure to submit preliminary reports on election campaign expenses, while 14 requests were submitted because final reports on election campaign expenses were submitted that did not contain all the data.

In addition to the aforementioned report, in 2025, the Agency also prepared and published, in accordance with the Law, the Report on the Control of Annual Reports on the Financing of Political Entities for 2023, which is available at the link: https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti#

The Agency filed a total of 36 requests for the initiation of misdemeanor proceedings against political entities that failed to submit reports on election campaign expenses, 26 requests were filed for failure to submit final reports on election campaign expenses and 10 requests were filed for failure to submit preliminary reports on election campaign expenses, while 14 requests were filed because final reports on election campaign expenses were submitted that did not contain all the data.

In addition to the aforementioned report, in 2025, the Agency also prepared and published, in accordance with the Law, the Report on the Control of Annual Reports on the Financing of Political Entities for 2023, which is available at the link: https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti#

The Agency filed a total of 76 requests for the initiation of misdemeanor proceedings against political entities that did not submit an annual financing report. The Agency also filed another 18 requests for the initiation of misdemeanor proceedings for other violations of the Law on the Financing of Political Activities (due to prohibited financing, misuse of public resources, etc.)

In addition to the above, the Agency issued 34 additional warning measures in regular proceedings in the proceedings it conducted against political entities for violations of the Law on the Financing of Political Activities.

Based on final judgments imposing fines on political entities, the Agency has issued 27 decisions on the loss of funds from public sources, which have been published on the Agency's website and are available at the link https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti#

6.6 Anti-corruption measures in vulnerable areas (focus on the area of public procurements)

- Please inform of the number of public procurement procedures with only one tender submitted and any steps to reduce this (including legal, awareness raising, IT (portal) measures).

Public Procurement Office

In 2025, the PPO has developed two new versions of the Public Procurement Portal.

- As of version 1.20, new functionalities are available for both the contracting parties and the tenderers, such as the:

1) Invitations to business entities in an open procedure, i.e. when conditions from the PPL are met, the contracting authority may, in addition to the public invitation, also send invitations to the business entities listed in the preparation of the procedure;
2) Improvements for groups of tenderers, i.e. the Portal automatically generates the name of the tenderer group; members of the tenderer group receive a notification about the submitted, amended or revoked offer; members of the tenderer group who are not the holder of a group (that is, they are not authorized to communicate) now have equal rights to access information at the opening of tenders as the holders of the group (insight into their own tender, insight into the tender forms of other tenderers, etc.);
3) Additional checks of declarations on the fulfilment of criteria for the qualitative selection of a business entity, i.e. the Portal now also controls the consistency of the uploaded statements attached as part of the offer with data specified in the tender;
4) Process and communication through the Portal for the case of introducing a sub-contractor after conclusion of the contract / framework agreement;
5) Protection of rights, i.e. due to occasional errors when the contracting party in the rights protection procedure mistakenly indicates it is delivering a Decision (while actually uploading a Response), additional warnings were introduced in order to ensure consistency

with the content of the uploaded document, so now the contracting authority receives the submitted request, evaluates it, and then approves or rejects it.
As of version 1.21, new functionalities are available for both the contracting authorities and the tenderers, and it contains following:
1) The new method of entering data about subcontractors in the tender. Since this version, a new method of entering data on subcontractors has been introduced, in such a way that for each subcontractor in the tender, data on: Description of the part of the procurement subject that the subcontractor will perform / deliver or the quantity of procurement items to be executed / delivered by the subcontractor, or values with VAT, subcontracting currency or by percentage of the value of subcontracting.
2) Implementation of framework agreements. A new table has been introduced on the review of the contract for the contracting authority, in such a way that it is possible to easily monitor the implementation of the framework agreement, i.e. see the sum of the contracted values, the remaining amount for contracting based on the framework agreement and the percentage of execution of the framework agreement.
3) New controls for the application of environmental criteria have been introduced. In accordance with the Rulebook on the types of goods and services for which the contracting authorities are obliged to apply ecological aspects during the implementation of public procurement procedures, the rules on the Public Procurement Portal during the implementation of procedures have been changed in such a way that the Portal controls the obligation to apply ecological aspects for the newly introduced categories of cleaning services and electrical appliances for households.
4) From January 1st, 2026, the Portal implements new rules related to EU thresholds for high value procedures.

With aim to facilitate the application of the Public Procurement Law and using the Portal, Procurement Office organised several training with the final goal to increase the awareness of econimic operators about competition in public procurement procedures:

1. On March 10, 2025, the training for expert witnesses and appraisers on the topic "Basics of Public Procurement" was held by the PPO, in the organization of the National Alliance for Local Economic Development, and at the proposal of the Association of independent court expert witnesses and real estate appraisers. Court expert witnesses and appraisers were presented with the basics of public procurement relevant for submitting bids, with a special emphasis on undertaking activities on the Public Procurement Portal, with the aim of training expert witnesses and appraisers to participate in public procurement procedures.

2. In the period from 7 to 9 April 2025, the PPO held a three-day online training course for the preparation of the public procurement officer exam, within the EU Public Finance – Management Facility Project, funded by the EU and implemented by UNDP. The aim of the training was to improve the knowledge and understanding of public procurement for persons dealing with public procurements both with the contracting authorities and the bidders. In addition to legal and regulatory solutions, the participants were also presented with the basics of working on the Public Procurement Portal. More than 700 participants attended the training every day.

3. On May 14, 2025, the first training out of two trainings themed “Green and Social Procurements and Techniques and Instruments in Public Procurement Procedures” was successfully completed. The PPO, within the framework of the Project “Enhancing Competitiveness through More Effective Public Procurement and Sustainable Supply Chains (ESG)”, implemented by the National Alliance for Local Economic Development (NALED) and with the support of the Swedish International Development Cooperation Agency, held two trainings themed “Green and Social Procurements and Techniques and Instruments in Public Procurement Procedures. The aim of the trainings was to present to the participants the views of the PPO and examples of good practice in the field of green and social procurement, as well as the implementation of the dynamic procurement system and the electronic catalogue on the Public Procurement Portal. More than 100 representatives of contracting authorities and tenderers attended the training.

4. On June 10, 2025, the second training out of the planned two trainings themed “Green and Social Procurements and Techniques and Instruments in Public Procurement Procedures” was successfully completed. The PPO, within the framework of the Project “Enhancing Competitiveness through More Effective Public Procurement and Sustainable Supply Chains (ESG)”, implemented by the National Alliance for Local Economic Development (NALED) and with the support of the Swedish International Development Cooperation Agency, held two trainings themed “Green and Social Procurements and Techniques and Instruments in Public Procurement Procedures. The aim of the trainings was to present to the participants the views of the PPO and examples of good practice in the field of green and social procurement, as well as the implementation of the dynamic procurement system and the electronic catalogue on the Public Procurement Portal. More than 100 representatives of contracting authorities and tenderers attended the training.

5. On September 26, 2025, the PPO, in cooperation with the United Nations Development Programme and with the support of the Software Protection Association – Legalis, organized a presentation of the Guidelines for Contracting Authorities for the Award of Contracts in the Field of IT Services and Goods.
The Guidelines were developed within the framework of the project “EU Support for Public Finance Management in Serbia”, funded by the European Union and implemented by the United Nations Development Programme. After introducing the participants to the provisions of the Public Procurement Law regarding public procurement of IT services and goods, examples of procurement of IT services and goods were presented, as well as the experience of the Software Protection Association – Legalis in relation to these procurements. The document "Guidelines for contracting authorities for the award of contracts in the field of IT services and goods" has been published on the website of the PPO in the Office's Technical Assistance section.

6. On October 1, 2025, the PPO, in cooperation with the Serbian Chamber of Commerce, organized a meeting attended by more than 40 representatives of economic entities participating in public procurement procedures. Representatives of economic entities informed the attendees about the problems they encounter when submitting bids and participating in public procurement procedures, while representatives of the PPO pointed out the importance of the proper implementation of the Public Procurement Law, with a special focus on improving competition in public procurement procedures. This event was an opportunity for representatives of economic entities to present their

suggestions and dilemmas regarding legal and regulatory solutions in the field of public procurement.

7. In the period 6 – 8 October 2025, a working meeting was held on the topic "Further strengthening of cooperation between the PPO and the Commission for the Protection of Competition with special emphasis on the functionalities of the Public Procurement Portal of importance for the work of the Commission for the Protection of Competition". The participants had the opportunity to exchange experiences by analyzing the advanced functionalities of the Public Procurement Portal, as well as specific examples of cooperation between these two institutions. The meeting ended in a constructive atmosphere with the exchange of proposals for further improvement of cooperation.

8. In the period from 8 to 10 October 2025, the PPO, within the framework of the EU Public Finance – Management Facility Project, which is funded by the EU and implemented by the UNDP, held a three-day training course for the preparation of the public procurement officer exam. The participants were presented with legal and by-law solutions in the field of public procurement, as well as the basics of working on the Public Procurement Portal, all with the aim of improving knowledge and assisting in preparation for the exam.

9. During November 2025, trainings were conducted for contracting authorities and bidders in six districts: North Bačka, West Bačka, South Banat, Mačva, Niš and Šumadija. The trainings were organized within the framework of the project "EU Support for Public Finance Management in Serbia", funded by the EU and implemented by UNDP, in cooperation with the PPO. The participants of the trainings were presented with the functionalities of the Public Procurement Portal, including the application of the framework agreement, e-catalogue, e-tendering, contract award criteria and technical specifications.

10. In the period from 27 to 28, November 2025, the fourth international CORE Days conference was held in Belgrade, organized by NALED and supported by the Swedish International Development Cooperation Agency. One of the key panels was “Social Procurement – Building Inclusive Supply Chains”. The representative of the PPO pointed out the use of social criteria in public procurement, but also the importance of activities undertaken to educate contracting authorities and bidders through training and published model tender documents for social public procurement.

11. In the period from 8 to 9 December 2025, the PPO, within the framework of the project "EU Support for Public Finance Management", which is funded by the EU and implemented by the UNDP, held a training on the topic "Advanced Use of the Public Procurement Portal for the Prosecutor's Office and the Police". Representatives of the prosecutor's offices and the police were presented with the method of searching for data on the Public Procurement Portal, all with the aim of performing tasks within their competence.

12. On December 9, 2025, within the framework of the Project "Efficient Public Procurement and Sustainable Supply Chains (ESC) for Improving Competitiveness", implemented by the National Alliance for Local Economic Development and with the support of the Swedish International Development Cooperation Agency, another working meeting of the PPO and the Competition Protection Commission was held. The meeting was focused on considering the methods of searching for data on the Public Procurement Portal, for the purposes of performing tasks within the competence of the Competition Protection Commission.

13. On December 12, 2025, the PPO, within the framework of the Project "Efficient Public Procurement and Sustainable Supply Chains (ESG) for Improving Competitiveness", implemented by the National Alliance for Local Economic

Development and with the support of the Swedish International Development Cooperation Agency, held another training on the application of techniques and environmental aspects in public procurement procedures. Participants of the training were presented with the advantages of applying the framework agreement, as well as examples of good practice in applying environmental aspects in framework agreements. The second part of the training was dedicated to the implementation of the public procurement procedure using the framework agreement technique on the Public Procurement Portal, with special emphasis on the most common mistakes made by contracting authorities.

Also, the PPO continued creating practical tools and different soft law acts (quidelines, guides, instructions, models of tender documentation) for facilitating for the economic operators the use of the Public Procurement Portal and application of the PPL, particularly regarding green procurement, social procurement and techniques and instruments in public procurement procedures. All these acts are published on PPO website https://www.ujn.gov.rs/en/ppo-professional-assistance/.

- Could you please inform about your plans to limit the existing exceptions to the law on public procurement, also to address the current challenges in alignment with the EU acquis, in particular in the context of intergovernmental agreements?

Ministry of Finance

Within the Reform Agenda, the Republic of Serbia committed to increasing the level of transparency regarding all projects contracted under intergovernmental agreements by introducing project-specific information on the websites of the ministries responsible for the implementation of the projects, covering all completed, ongoing, and new procurement contracts under intergovernmental agreements. It is also stipulated that this practice will be maintained in the coming years for all new contracts; therefore, new projects are continuously monitored in order to ensure an adequate level of transparency.

In this regard, following extensive work related to the step on intergovernmental agreements, the Republic of Serbia submitted to the European Commission, in July 2025, a list of relevant projects, published on the websites of the Ministry of Finance, the Ministry of Mining and Energy, and the Ministry of Construction, Transport and Infrastructure. After the submission of the additional information requested, the European Commission provisionally considered this step fulfilled. Given that the Republic of Serbia is obliged to monitor the implementation of the steps under the Reform Agenda until the end of the Reform Agenda implementation period, i.e. until the end of 2027, the Ministry of Finance, with the aim of ensuring adequate monitoring of activities related to the implementation of this step, requested the competent authorities to designate contact points for matters related to intergovernmental agreements, and this list was updated at the end of 2025.

- Please inform on steps taken by the prosecution following findings of the State Audit Institution (SAI) in reports concerning public procurement and large public expenditures. How many cases have been initiated based on the SAI reports? What are their outcomes?

Supreme Public Prosecution Office

Pursuant to Article 41 of the Law on the State Audit Institution, the Institution is obliged to file a criminal report to the competent authority without delay if during the audit process it discovers materially significant actions that indicate the existence of elements of a criminal offense.

During 2025, 20 cases were opened in prosecution offices based on criminal reports and reports from the State Audit Office. Of the above number a verdict has been issued in one case, in 8 cases it was determined that there are no grounds for criminal proceedings (some of them after deferring criminal prosecution), while the remaining cases are in progress. In addition, prosecution offices act on previously filed criminal reports, as well as reports of economic offenses.

- Could you please inform on whether steps were taken in 2025 to further reinforce the SAI's staffing, financial and technical capacities to oversee public spending?

State Audit Institution

To carry out its responsibilities, the SAI utilizes and manages appropriate resources, including financial means, human resources, IT equipment, and office space. Additionally, part of its resources is allocated to activities contributing to capacity building.

The SAI's operating funds are provided through the budget of the Republic of Serbia, within a dedicated budgetary section in accordance with the Law on the Budget of the Republic of Serbia. In 2024, the SAI utilized 98% of approved funds.

The SAI has adopted a Human Resource Management Strategy for 2023–2027, supporting the implementation of the SAI's Strategic Plan through activities such as human resource planning, recruitment and hiring, rewards and recognition, performance management, training and development, employee retention, and employee well-being.

The central objective of the Strategic Plan 2024–2028 is to ensure that the SAI continues to perform its role efficiently and effectively in promoting transparency, accountability, and good governance in the public sector. The plan focuses on three key areas: responsible management of public funds, timely and high-quality achievement of results, and preservation of the SAI's reputation and enhancement of its impact, achieved through continuous improvement of staff capacities and competencies.

Under the Rulebook on Internal Organization and Systematization of Job Positions, the SAI's internal structure is defined, positions are classified, and the number of State Auditors and other staff members for each position is determined. The systematization of job positions specifies a total of 426 positions. Each year, the SAI prepares a Personnel Plan together with the Financial Plan, based on which positions are filled. As of 25 December 2025, the SAI has 330 employees.

The law prescribes audit titles—State Auditor and Certified State Auditor—and the conditions for obtaining them. The training and examination program for these titles, established by the Rulebook on the Program and Procedure for the Examination for Obtaining the Titles of State Auditor and Certified State Auditor, aims to prepare auditors for effective performance of their duties in accordance with the Law on the SAI.

The SAI also develops an annual professional development program, specifying the rationale, objectives, scope, target groups, methods of implementation, expected outcomes, duration, evaluation, and costs. The primary objective is to enhance the capacities of staff in auditing, audit-related tasks, and ensuring conditions for conducting audits.

Professional development is conducted at the National Academy for Public Administration (NAPA) according to pre-established schedules, following the General Training Program for Civil Servants and the Training Program for Managers in State Authorities.

A portion of SAI auditors has attended the Professional Education for Supreme Audit Institution Auditors (PESA) and obtained international public sector auditor certifications issued by the INTOSAI Development Initiative (IDI). This is a globally developed curriculum for financial audit, compliance audit, performance audit, and cross-cutting issues, covering all competencies specific to public sector auditing (in accordance with the INTOSAI Competency Framework).

Professional development of staff is conducted through cooperation between the SAI and the European Court of Auditors, which organizes internships for auditors from the Supreme Audit Institutions of EU candidate countries.

The SAI also utilizes internal training programs in combination with partnerships with donors.

During 2025, a total of 311 participants attended various training sessions (approximately 70 in total).

In the 2024 SIGMA Assessment Report on the Principles of Public Administration of the Republic of Serbia, external audit was the area with the highest score in Serbia, achieving 91/100. For other assessed Supreme Audit Institutions (SAIs) in the region, this indicator ranges between 73 and 82.

These results demonstrate that the SAI continuously improves its work processes, applies methodological innovations, and optimizes resource use to conduct audits in a high-quality and efficient manner. The achieved outcomes confirm the SAI's strong commitment and effectiveness in its work, while maintaining a focus on the quality and timeliness of audit execution. Full implementation of the Audit Program and high staff productivity serve as evidence of successful audit process management. The number of audit outputs per employee is 1.80, compared to the planned value of 1.82, representing nearly complete achievement of the target. This indicates a stable level of productivity, with a minor deviation resulting from the complexity of certain audits and the need for more thorough analyses.

Work efficiency can be further enhanced through continued optimization of the organizational structure, improved human resource management, and digitalization of audit processes. Key steps include the introduction of automated tools for risk analysis and audit prioritization, as well as the development of an information system that would enable faster reporting and reduce administrative burden. It is also necessary to continue implementing the Strategy for the Use of Technology in Audits and the Audit of the Use of Technology by public fund beneficiaries (LOTA Strategy), with further integration of advanced analytical tools. Modernizing audit processes in the SAI through the integration of contemporary technologies will ensure that the SAI remains relevant and effective in its work, in line with current trends and challenges arising from digital transformation in the public sector. The development of audit processes will be pursued through the application of modern technologies in auditing, including audits of technology use by public fund beneficiaries and audits of new technologies, as well as the development of the SAI staff's digital skills and capacities.

- Please inform on the percentage of measures from the Action Plan implemented in vulnerable sectors including construction, transport/infrastructure, defence, cohesion, agriculture, environment, healthcare, citizen/residence investor schemes, urban planning,

disbursement of EU funds, and measures to combat corruption committed by organised crime groups infiltrating the public sector.

Ministry of Agriculture, Forestry and Water Management

The Ministry of Agriculture, Forestry and Water Management acts in accordance with the public procurement procedures laid down by the Law on Public Procurement. In applying this law, the Ministry acts in an economical and efficient manner, ensures competition and equal treatment of all economic operators without discrimination, and conducts procedures in a transparent and proportionate way.

A significant number of civil servants have completed training on measures in the field of ethics and integrity, organised by the Agency for the Prevention of Corruption as well as by the National Academy for Public Administration for the 2025–2027 cycle.
In the report of the State Audit Institution concerning the audit of the financial statements of the Ministry of Agriculture, Forestry and Water Management – Budget Line 24.0, Belgrade, for 2023, no irregularities were identified in relation to the conducted public procurements that would warrant recommendations by the SAI.

The Ministry of Environmental Protection

The Integrity Plan is a document established based on the institution's self-assessment procedure to identify exposure to corruption risks and ethically and professionally unacceptable actions. The goal of the Integrity Plan is to maintain and improve the institution's integrity by simplifying procedures, strengthening accountability, controlling discretionary powers, providing education, enhancing ethics, establishing an effective control system, and eliminating inefficient practices.

The adoption of the Integrity Plan aims to establish an institutional mechanism that mitigates the risks of public powers being exercised contrary to their intended purposes, thereby enhancing the efficiency and effectiveness of the institution's operations.

As part of this effort, the Ministry of Environmental Protection has developed the Integrity Plan, the third cycle for the period 2021 - 2024, where risky processes were defined and 19 improvement measures for managing the risk of corruption were identified, including:

Employee Conflict of Interest Prevention and Management – establish that every employee must, immediately after signing the employment contract and throughout their employment, report the following: if they are engaged in work based on a contract of service, temporary or occasional jobs, or supplementary work in another legal entity; if they are the founder or owner of a business company or public service; a statement if they perform independent activities in accordance with entrepreneurship laws; if they manage, supervise, or represent private or state capital in a business company, private institution, or other legal entity. Additionally, when planning training programmes for managers and employees, it is essential to include trainings concerning the impact of corruption on sensitive groups.

Regulating the employee gift policy - An internal act must be established to mandate the appointment of an individual responsible for maintaining a record of gifts received by employees and officials within the institution.

Protection of Whistleblowers: All employees should be familiar with the internal whistleblower regulation.

Adopting the Internal Job Classification Act (Systematization): Representatives of all organizational units should be involved in the development of the needs analysis.

Hiring: Members of the commission must have a minimum of three years of professional experience.

Evaluation (Performance Review) and Career Progression/Promotion: An obligation should be established for decision-makers to provide a written response to employees' requests for career advancement. Additionally, statistics on employee advancement/promotion, categorized by gender, should be kept.

Rewards and Sanctions: Statistics on employee bonuses/rewards, categorized by gender, should be kept.

Salary Increments/Allowances: Statistics on salary increments/allowances, categorized by gender, should be kept.

Budget Planning and Execution (Development and Implementation of a Financial Plan): A financial management and control system should be established.

Information Technology (IT) Security: Log files (a chronological record of IT activities) should be kept. Unsuccessful login attempts to confidential and sensitive data should be automatically registered. The system should recognize from which computer the unsuccessful login attempt was made. Automatic bans should be enabled in case of repeated unsuccessful login attempts. Unsuccessful logins should be investigated if they appear suspicious (depending on the number of login attempts and the level of confidentiality of the requested data).

Inspection Activities: A plan for training and professional development of inspectors should be developed.

Measures: Adoption of a procedure for conducting internal control of inspection and adoption of an internal act that precisely defines and provides clear instructions for information management (access, use, control, retrieval, disposal of data and equipment, classification of data as confidential, etc.), have not been implemented on time due to the shortage of human resources. This will be addressed in the upcoming period.

All measures listed above have been implemented, and efforts to further improve identified risk areas are ongoing.

- Please inform of the outcomes of the misdemeanour procedures submitted by the Public Procurement Office.

Supreme Court

According to data of the Misdemeanor Appellate Court, in terms of the application of the Law on Public Procurement, in 2025, 401 new cases were received in misdemeanor courts. A total of 316 cases were resolved before misdemeanor courts, namely there were 294 convictions, 10 acquittals, in 12 cases proceedings were dismissed for different procedural reasons. Final rulings were rendered in 227 cases.

Public Procurement Office

During 2025, the PPO submitted a total of 288 requests to initiate misdemeanor proceedings to the competent misdemeanor courts. Up to now, the competent courts have issued a 32 judgments which found that the defendants liable. This data will be presented detailed in the Annual Report on the monitoring for the year 2025 in accordance with Article 180 paragraph 6 of the Public Procurement Law ("Official Gazette of the Republic of Serbia", Nos. 91/19 and 92/23), no later than 31st March 2025.

- Please inform on how Serbia has been implementing the Lex specialis on the organisation of EXPO 2027, and what steps it has taken to ensure transparency and compliance with the rules of public procurement in line with the national legislation and the EU *acquis*.

Ministry of Finance

The Regulation on Procurement Rules for Goods, Services, or Works Necessary for the Implementation of the International Specialized Exhibition EXPO BELGRADE 2027 establishes the procurement rules for goods, services, or works conducted by a special economic entity and a special-purpose company as contracting authorities. Concerning the derogations in the procurement rules set out in the Regulation from the Serbian Public Procurement Law (which is broadly aligned with the EU acquis), it should be underlined that the Regulation applies only to the special SOEs (a special economic entity and a special-purpose company) that have been (or will be) established solely for the purpose of managing the project of organizing the International Specialized Exhibition EXPO, as well as for the construction of housing for the accommodation of participants and visitors of the Exhibition. All of the aforementioned deviations have been introduced in order to ensure the efficiency and speed of procedures, bearing in mind that the deadline for the implementation of all activities related to the Exhibition is 1 December 2026. The Regulation stipulates that the contracting authority is obliged to act in an economical and efficient manner, to ensure competition, equal treatment of all economic operators, without discrimination, and to act in a transparent and proportionate manner. It also stipulates the obligation of the contracting authority to take all necessary measures to prevent corruption, as well as measures to identify, prevent and eliminate conflicts of interest.

- Please inform as to any safeguards put in place to mitigate risks of corruption and to ensure transparency as regards the Lex specialis adopted for the General Staff building.

General Secretariat of the Government

SAFEGUARDS TO MITIGATE RISKS OF CORRUPTION AND TO ENSURE TRANSPARENCY OF THE LAW ON SPECIAL PROCEDURES FOR THE IMPLEMENTATION OF THE PROJECT FOR THE REVITALIZATION AND DEVELOPMENT OF THE LOCATION IN BELGRADE BETWEEN KNEZA MILOŠA, MASARIKOVE, BIRČANINOVE AND RESAVSKA STREETS ("OFFICIAL GAZETTE OF THE REPUBLIC OF SERBIA NO 96/25)

Article 1, paragraph 2. Unless otherwise provided by this Law, the provisions of the Law regulating planning and construction and the Law regulating general administrative procedure shall also apply.

The Law on Planning and Construction "Official Gazette of the Republic of Serbia", No. 72 of September 3, 2009, 81 of October 2, 2009 - correction, 64 of September 10, 2010 - US, 24 of April 4, 2011, 121 of December 24, 2012, 42 of May 14, 2013 - US, 50 of June 7, 2013 - US, 98 of November 8, 2013 - US, 132 of December 9, 2014, 145 of December 29, 2014, 83 of October 29, 2018, 31 of April 29, 2019, 37 of May 29, 2019 - etc. law, 9 of February 4, 2020, 52 of May 24, 2021, 62 of July 27, 2023, 91 of October 23, 2025, 2contains numerous mechanisms that constitute prevention and protection from corruption, see the Law on https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/11/reg

The Law on General Administrative Procedure ("Official Gazette of the Republic of Serbia", No. 18 of March 1, 2016, 95 of December 8, 2018 – Authentic Interpretation, 2 of January 13, 2023 – Const Court) prescribes strict rules of conduct, and these rules shall be applied to each phase of planning and construction of the future facility(ies).

This Law does not provide for an exception to the Law on Public Procurement, so that any future procurement of goods, works and services shall be subject to the application of the provisions on public procurement.

The Law on Special Procedures for the Implementation of the Revitalization and Development Project for the Location in Belgrade between Kneza Miloša, Masarikova, Birčaninova and Resavska Streets ("Official Gazette of the Republic of Serbia" No. 96/25) **DOES NOT PROVIDE FOR DEVIATIONS from all provisions of the Law on Planning and Construction and the Law on General Administrative Procedure that would violate the system of protection and prevention of corruption or diminish the transparency of its iplementation**. The essence, or rather the goal of enacting a special law, is contained in the obligation of all state bodies to issue acts without delay, and that the construction of future facilities is considered a project of special importance for the Republic of Serbia.

It is thus stipulated that all procedures carried out in accordance with the provisions of this law are considered urgent and all state bodies and bodies of local self-government units, companies, as well as other bodies and institutions exercising public powers are obliged to issue acts within their competence without delay and to implement the project in phases.

This Law itself contains protective mechanisms, namely in the following articles:

Article 4.

Before being presented for public inspection, the draft planning document is subject to expert control.

The presentation of planning documents for public inspection is advertised in a daily newspaper and lasts 15 days from the date of advertising.

Article 6.

Location conditions, construction permit, work registration and use permit are issued to the investor, in accordance with the provisions of the law regulating the construction of facilities, unless otherwise prescribed by this Law.

Article 8.

The expert control and audit committee referred to in Article 131 of the Law on Planning and Construction may, when assessing the fulfillment of the conditions established by special regulations, standards and other acts, accept proof of fulfillment of the requirements according to international standards, as well as according to recognized calculation methods and models if they are provided for by those regulations, in order to fulfill the basic requirements for the facility, as well as the requirements for its design, construction and maintenance.This law does not provide an exception from the Public Procurement Law, so any future procurement of goods, works and services is subject to the application of public procurement provisions.

- Please inform about the timelines for amending the Law on medicines and medical devices in accordance with the performed corruption risk analysis.

Ministry of Health

The adoption of the new Medicines Law is planned for the fourth quarter of 2026.

Horizontal matter

7. Criminal justice chain

7.1 Implementation of the law on the organisation and jurisdiction of state authorities in suppression of organised crime, terrorism and corruption

- Considering the fact that the Law on the organisation and jurisdiction of state authorities in suppression of organised crime, terrorism and corruption does not regulate in sufficient details the role and mandate of the Prosecutor's Office for Organised Crime (POOC) as the coordinator in relation to the special departments of higher public prosecutor's offices for suppression of corruption, could you please inform about further steps taken to ensure effective coordination? Regarding the measure, in the Action Plan of the National Anticorruption Strategy, on adopting the bylaw referred to in Article 16, paragraph 4 of this Law to regulate the deadlines, procedure and manner of official communication between the police and the public prosecutor's office in cases of organised crime and corruption by 4Q 2025, could you please inform whether work on this bylaw has begun and what the timeline is for its adoption?

Ministry of Justice

With regard to the Law on the Organisation and Jurisdiction of State Authorities in the Suppression of Organised Crime, Terrorism and Corruption, the OSCE Mission has provided support to the Ministry of Justice in relation to this Law, which resulted in the organisation of focus groups. Following the adoption of the amendments and supplements to the Criminal Code and the Criminal Procedure Code, the Ministry of Justice will establish a Working Group

tasked with conducting an analysis of the Law on the Organisation and Jurisdiction of State Authorities in the Suppression of Organised Crime, Terrorism and Corruption. The aim of this analysis is to precisely identify the provisions that need to be amended in order to achieve the most appropriate solutions within this area. The relevant bylaw will be also a part of the analysis.

- Please inform about necessary legislative steps and the timeline for their implementation, including to meet the GRECO recommendations from the V round of evaluations, to extend the competence of the POOC "to cover all persons with top executive functions, including the President, for criminal offences against an official duty, and to be staffed adequately to fulfil its role". Please inform about how the EU peer review recommendations on organised crime and corruption will be taken into consideration in those amendments.

Ministry of Justice

Please find the response of the Republic of Serbia in the Second Compliance Report Assessing the implementation by the Republic of Serbia of the Group of States against Corruption (GRECO) recommendations from Fifth Evaluation Round that was submitted to GRECO on 31st December 2025.

- Could you please inform on plans, and measures taken, to appoint specialised judges in anti-corruption and organised crime departments? In particular, please inform about any changes to the state of play of human resources in the Special department of the Higher Court of Belgrade in charge of organised crime, in the Special department of the Appellate Court of Belgrade in charge of organised crime and in the Special departments of the Higher courts in Belgrade, Kraljevo, Nis and Novi Sad, tasked with combating corruption.

Supreme Court

Regarding appointment of specialised judges in the Special Department for Organized Crime and Special Departments for Suppression of Corruption, it should be noted that according to Article 35-36 of the Law on Organisation of Courts, the court president adopts the annual schedule of court activities, after having obtained the opinions of judges, and announces it at the session of all judges, thus ensuring transparency among judges. Judge can file an objection to the annual schedule of activities within three day time limit, and if the court president does not accept the objection, he/she shall submit the objection to the High Judicial Council (HJC), which is obliged to decide on the objection within 30 days from the date of submission. If HJC does not decide within the precribed deadline, the objection is considered to have been adopted.

According to Article 7-8 of the Law on Organization of Courts and competencies of state authorities in suppression of organized crime, terrorism and corruption, judges in the Special departments must have many years of experience in the field of criminal law, (The President of the Special Department of the Higher Court must have at least 10 years of professional experience in the field of criminal law, while the judge must have at least 8 years; The President of the Special Department for Organized Crime of the Appellate Court must have at least 12 years of professional experience in the field of criminal law, and the judge of this Department at least 10 years). Further, under Art. 7. Paragraph 6 and 7 and Article 8 Paragraph 6 and 7 of the same Law, High Judicial Council may temporarily assign a judge from another court to the Special Department for Organised Crime within Higher Court or to the Special Department for Organised Crime within Appellate Court, wherein advantage shall be given to judges who possess the necessary professional knowledge and experience in the field of fight against organised crime and corruption.

With regards to the Special Departments of Higher Courts for Suppression of Corruption, according to Article 18. Paragraph 4 of the same law, the HJC may temporarily assign a judge from another court to the Special Department for Suppression of Corruption. The judge temporarily assigned must fulfil the criteria for election of judges to the Higher Court. According to Article 20, Paragraph 6 of the Law on Judges, a judge has the right to lodge an appeal against the decision on temporary assignment with the Constitutional Court within 30 days from the day of receipt of the decision. Under paragraph 4 of the same Article it is envisaged that prior to the adoption of a decision on temporary assignment of the judge laid down in paragraphs 1 to 3 of this Article, the High Judicial Council shall obtain the opinion of the session of all judges in the court to which the judge was elected and the court to which the judge is temporarily assigned. The decision of the HJC shall be adopted with prior consent of the judge who should be assigned to another court (Art.20, par 3).

Regarding the issue of capacity, in principle there is no significant changes concerning human resources.
Regarding this question, we submit a report on the number of judges who are assigned to act in the Special Departments for Organized Crime and the Special Departments for Suppression of Corruption based on the Annual Work Schedule for judges for 2025. At the Higher Court of Belgrade, 21 judges were assigned to the Special Department for Organized Crime (18 presidents of the chambers and 3 judges for preliminary proceedings), which is 1 judge for preliminary proceedings more compared to the previous period.
Within Special Department for Suppression of Corruption of the Higher Court of Belgrade 5 judges have been assigned (4 presidents of the chambers and 1 judge for preliminary proceedings).
At the Higher Court of Novi Sad, 7 judges have been assigned to the Special Department for Suppression of Corruption. At the Higher Court of Niš, 7 judges have been assigned to the Special Department for Suppression of Corruption. At the Higher Court of Kraljevo 5 judges have been assigned to the Special Department for Suppression of Corruption.

High Judicial Council

Pursuant to Article 35 of the Law on the Organization of Courts (Official Gazette of the Republic of Serbia, No. 10/23), the annual schedule of court activities shall be adopted by the president of the court. The annual schedule of activities of judges shall be determined according to area of law a judge proceeds. The annual schedule of court activities may change during the year, if necessary, to achieve more efficient work of the court, and especially due to a longer absence of a judge, the significantly increased or decreased inflow of cases during the year in certain legal areas, or the vacant judge's position. Article 36 prescribes the procedure for the adoption of the annual schedule of activities. The president of the court determines the schedule of court activities or change of schedule in writing for the following year, after obtaining the opinions of the judges, and announces it at a session of all judges by 1 November of the current year. A judge can file an objection to the annual schedule of court's activities or change to the annual schedule to the High Judicial Council, within three days from the day of announcement of the court's schedule of activities or changes at the session of all judges or familiarization with the annual schedule of court activities if the judge did not attend the session of all judges for justified reasons.

The objection is submitted through the president of the court, who can, in accordance with the submitted objection, change the annual schedule of tasks.
If the president of the court does not accept the objection, he shall be obliged to submit the objection, with a reasoning of the schedule of activities, to the High Judicial Council within three days of the day of receipt of the objection.
Failure of the court president to act within the prescribed time limit shall be considered a disciplinary offense.
The High Judicial Council is obliged to decide on the objection within 30 days from the day of receipt of the complaint. If the High Judicial Council does not decide on the objection within the prescribed period, it is considered that the objection has been adopted.

Article 53 prescribes rights and obligations of court president. The court president shall organize the work of the court, represent the court, manage the court administration, ensure the implementation of the Court Rules of Procedure, and shall be responsible for the proper and timely operation of the court. The court president is required to ensure legality, order and accuracy in the court, order removal of irregularities and prevent excessive delays in work, designate ex officio lawyers, ensure the safeguarding of the independence of judges and the reputation of the court, and perform other tasks set forth by law and the Court Rules of Procedure.

Considering the above legal provisions, it is a fact that the president of the court with annual schedule assigns judges to court departments, including the organized crime department and the anti-corruption department in courts where the aforementioned departments exist, taking into account the proper and timely work of the court.
We would like to point out in particular that courts publish their annual work schedules on their websites. The annual work schedule lists the names of judges who work in the Organized crime department and the Anti-Corruption department.

Regarding the employees - court staff in the aforementioned departments, we would like to point out that the number of court staff is determined by the president of the court, by an act on internal organization and systematization of jobs in the court, in accordance with the staffing plan. The president of the court shall submit the act on the internal organization and systematization of jobs in the court for the opinion of the High Judicial Council, before submitting the act to the ministry responsible for justice for approval. The criteria for determining the number of court staff shall be determined by the minister responsible for justice upon obtaining the opinion of the High Judicial Council.

- Please inform on measures to address staff shortages in the POOC, including financial forensic experts, and in the Special Prosecutor's Office for Cybercrime (SPOC). The Action Plan of the National Anticorruption Strategy includes as a measure the continuous filling of vacant positions in accordance with the Rulebook on Systematization of Positions in the POOC, and continuous training to ensure more efficient enforcement of the Law on the Organization and Competence of State Authorities in Suppression of Organized Crime, Terrorism and Corruption – please inform about what activities you have carried out to implement these measures.

Ministry of Justice

The Ministry of Justice, within its competences, enabled and implemented the systematization of the necessary jobs, including financial forensics. In this sense, consent was given to the Rulebook on systematization and internal organization in the Public Prosecutor's Office for

Organized Crime and Higher Public Prosecutor's Offices with special departments for the fight against corruption and limited crime.

Article 38 of the Law on Public Prosecution stipulates that the Chief Public Prosecutor determines the organization and work of the public prosecution and that it is within his exclusive competence to decide on labor and legal relations, including the establishment of an employment relationship.

Judicial Academy

During 2025, Judicial Academy has conducted the following activities which included a number of participants from the abovementioned target groups:

- In cooperation with the OSCE Mission, Judicial Academy conducted four one-day seminars in Novi Sad and Belgrade on the topic: ‘’Improved and new scientific methods in the area of crime forensics- Inspection as an Evidentiary Action- module 3- digital forensics’’ for a total of 114 participants.
- In cooperation with the Council of Europe and the Swedish International Development Cooperation Agency (Sida), Judicial Academy conducted one two-day and two one-day trainings on the topic: ‘’ Key evidence from the National Risk Assessment of Money Laundering, Terrorist Financing and Proliferation Financing 2024 and its significance for internal policies", in Belgrade, Vrnjačka Banja and Novi Sad, for a total of 139 participants.
- Judicial Academy has conducted two two-day workshops at Zlatibor and in Belgrade, on the topic: ‘’Confiscation of proceeds of crime’’, for a total of 40 participants.
- In cooperation with the OSCE Mission, Judicial Academy conducted two three-day trainings in Belgrade, on the topic: ’’Investigation and confiscation of cryptocurrencies’’, for a total of 22 participants.
- In cooperation with the OSCE Mission, Judicial Academy conducted six two-day trainings in Niš, Belgrade, Sremska Kamenica and Vrnjačka Banja, on the topic: "Methods of managing electronic devices, electronic evidence and electronic evidence carriers", for a total of 74 participants.
- Judicial Academy conducted a two-day workshop in Belgrade on the topic: "International Legal Assistance in Cases of Serious and Organized Crime", for a total of 18 participants.
- In cooperation with the OSCE Mission, Judicial Academy conducted one two-day training at Zlatibor, on the topic: "Fighting Money Laundering", for a total of 26 participants.

- Please provide information on the plans to improve the material and technical resources of the POOC and the SPOC.

Ministry of Justice

In order to improve accommodation conditions and create the necessary and modern technical conditions for the work of judicial bodies, the Ministry of Justice has continuously invested, both in the reconstruction and adaptation of existing facilities of judicial bodies, and in the construction of completely new facilities, designed in accordance with the needs of judicial bodies according to the most modern criteria for that type of facility, as well as in equipping them with new office furniture and necessary equipment (computer, security, communication, etc.).

Based on requests submitted by judicial bodies, monitoring and comparison of existing equipment, the necessary computer, security, office and other equipment was purchased in order to improve technical working conditions.

The implementation of the modernization of computer systems and equipment of judicial bodies was continuously monitored, and in this regard, the necessary equipment (item 512 - Machinery and equipment) was purchased in the facilities of courts and prosecutor's offices.

• January 1, 2025 – December 31, 2025

During the specified period, the following funds were transferred to the judicial authorities in accordance with the requirements and needs for the following budget classification:

425 – ongoing maintenance of facilities and equipment.....RSD 102.599.564,00
511 – buildings and construction facilities ..... RSD 16.191.716,00
512 – machines and equipment ..... RSD 74.520.989,00

In addition, the following capital projects were implemented:

- PROJECT 5006 – PROCUREMENT OF NECESSARY EQUIPMENT FOR THE FUNCTIONING OF JUDICIAL AUTHORITIES

Within this project, various procurements related to computer equipment are planned in order to improve and digitize the judicial system (a detailed report is available in the ICT group), as well as to facilitate the archiving process and the procurement of necessary furniture for the facilities of judicial authorities. In addition to the above, within the framework of this project, the necessary office furniture, security equipment (Explosive Detection Portals and scanners), archive shelves and racks and other equipment for the needs of judicial authorities were purchased.

- PROJECT 5010 – IMPROVEMENT OF ACCOMMODATION AND TECHNICAL WORKING CONDITIONS OF JUDICIAL AUTHORITIES

Within the framework of this project, during 2025, the following works were carried out:

1. The reconstruction and adaptation of the existing building of the Basic Court in Ub (gross area of 1815m2) was completed. The building was connected to the electricity distribution system (the Electricity Supply Agreement was concluded), and the Republic of Serbia was registered in the Real Estate Cadastre of the Municipality of Ub;
- The procurement of necessary equipment (furniture, computers, security equipment, etc.) was also completed and the facility was put into use.
2. Construction of a new building for judicial authorities in Novi Sad - with the aim of creating adequate accommodation and technical conditions for the work of judicial authorities in Novi Sad, and within the framework of the IPA 2017 Program, a project to construct a new building for judicial authorities was implemented, at ul. Stražilovska (on cadastral plot 7962 K.O.

N.Sad) in Novi Sad, which is intended to accommodate four institutions - the Higher and Basic Public Prosecutor's Offices and the criminal departments of the Higher and Basic Courts in Novi Sad. The building has 2 floors (2Po+Su+Pr+6) - two basement floors, basement, ground floor and six floors, total gross area - Pbruto = 10,578.74m2
The preparation of technical documentation and the execution of works were financed from EU funds, while the Ministry financed the interior decoration and the purchase of office furniture, as well as the purchase of necessary equipment (computer, security and other equipment necessary for the functioning of the building) from its own funds.
The building is connected to the EDB system and an Occupancy Permit has been obtained. The completion of this facility will provide adequate conditions for the work of special departments, as well as the prosecutor's office dealing with organized crime cases.
3. The preparation of technical documentation (Execution Project - PZI) for the work on replacing the facade joinery and reconstructing the facade of the judicial authorities building in Novi Sad has been completed. (The start of work is planned in 2026)
4. The 1st phase of work on the exterior decoration of the judicial authorities in Niš - the former "Filip Kljajić" barracks has been completed. (Parking, surrounding paths, lighting of the facility, fencing, etc.) The continuation of work is planned for 2026.

TABLE OF PROJECT IMPLEMENTATION DURING 2025.

project	title	Budget classification	2025. total
5006	PROCUREMENT OF NECESSARY EQUIPMENT FOR THE FUNCTIONING OF JUDICIAL AUTHORITIES	512	176.218.000,00
5010	IMPROVEMENT OF ACCOMMODATION AND TECHNICAL WORKING CONDITIONS OF JIDICIAL AUTHORITIES	511	143.830.290,00
total		RSD	320.047.410,00

- Please inform about: i) the state of play as regards employment of financial forensic experts in the special police departments for combating corruption foreseen in the law, ii) human resources for the police service for combatting high-tech crime and iii) personnel for the organised crime unit in the police investigating high-level corruption.

Ministry of Interior

The Anti-Corruption Department currently employs 8 police officers who hold the Certified Anti-Money Laundering Specialist (CAMS) certificate. The Department also employs 12 police officers who hold the Certified Forensic Examiner (CFE) certificate.

In addition to the above, the Department also has 1 master's degree in forensic accounting, while another 3 police officers are pursuing the aforementioned master's degree.
Current occupancy of work places in the Section for Combating High Corruption is 50 percent in relation to systematized work places. There is no interest of police officers in working in this organizational unit.

- Please inform about the type, frequency and effectiveness of the mechanisms of coordination between the POOC and the special departments and referral of cases to higher or lower instances.

The Public Prosecutor's Office for Organized Crime

The coordination role of the Public Prosecutor's Office for Organized Crime was mainly advisory in the sense that the prosecutors from the special anti-corruption departments turned to the coordinator from the Public Prosecutor's Office for Organized Crime when they had dilemmas regarding the case due to the experience that prosecutors for organized crime have in working on complex cases, and after that they continued to inform the coordinator about what they had done about the case.

Also, this mechanism was used for consultations in cases where there is a potential overlap of jurisdiction, that is, if a case is in a border zone, should it be handled by special anti-corruption departments or should the Public Prosecutor's Office for organized crime be involved.

In these cases, the delegated prosecutor for organized crime was in communication with the acting prosecutors from the special departments.

The coordination took place in 3 cases of Special anti-corruption department in Novi Sad, 2 cases of Special department in Kraljevo and 2 cases of Special department in Nis (both are handled by the POOC in this moment).

However, in 2025 the Special Anti-Corruption Department of the Higher Prosecutor's Office in Belgrade did not used this coordination mechanism in four cases: in two cases that were initiated by that office and in later stages these cases were transferred to the POOC by the decision of the Supreme Public Prosecutor, as well as in other two cases which were, upon raising indictments, referred by the court to the POOC, as competent prosecutor's office. The reason for the transfer of these cases to the Prosecutor's Office for Organized Crime was the fact that this office held subject-matter jurisdiction, rather than the Higher Public Prosecutor's Office in Belgrade, which had initiated the proceedings.

- Could you please inform about plans to strengthen the role and mandate of the POOC to increase its effectiveness in coordinating corruption cases in line with the recommendations of the European Commission?

Ministry of Justice

The Ministry of Justice is to work on the analysis of the relevant legal framework and as expressed in several occasions, we expect this analysis to be conducted jointly by the Ministry of Justice, European Commission, Council of Europe and in that respect the Venice Commission and GRECO in order to define concrete measures to be conducted in this field in the future period necessary to increase the effectiveness.

- Could you please inform on whether there are new strategies in place to ensure that special departments consistently inform the POOC about the launch of investigations to avoid parallel proceedings?

Ministry of Justice

The Ministry of Justice is to work on the analysis of the relevant legal framework and as expressed in several occasions, we expect this analysis to be conducted jointly by the Ministry of Justice, European Commission, Council of Europe and in that respect the Venice Commission and GRECO in order to define concrete measures to be conducted in this field in the future period necessary to increase the effectiveness.

- Please provide an update regarding any proposal for legislative amendments as regards the reorganisation of the prosecution service. In particular, could you please inform on whether there are plans to transfer the POOC under the jurisdiction of the Higher Public Prosecutor's Office in Belgrade?

Ministry of Justice

The Ministry of Justice is to work on the analysis of the relevant legal framework and as expressed in several occasions, we expect this analysis to be conducted jointly by the Ministry of Justice, European Commission, Council of Europe and in that respect the Venice Commission and GRECO in order to define concrete measures to be conducted in this field in the future period necessary to increase the effectiveness.

The Public Prosecutor's Office for Organized Crime

Public Prosecutor's Office for Organized Crime was not officially informed about draft law by which this prosecutor's office would be transferred under the jurisdiction of the Higher Prosecutor's Office in Belgrade. However, the President of the National Assembly's Committee on the Judiciary publicly announced amendments to a set of judicial laws that would lead to the abolition of the Public Prosecutor's Office for Organized Crime as an autonomous prosecutor's office of special competence and its integration into the Higher Public Prosecutor's Office in Belgrade. This proposal was welcomed by the Minister of Justice in his public statements. Minister even clarified that this is a matter of reorganization, and therefore it is not necessary to seek the opinion of the Venice Commission about these changes.

- Regarding the legislative procedure, it is important to emphasize that a law or amendments to the law can also be proposed by any Member of Parliament or a group of MPs, through which the law and amendments to the law can find its way onto the National Assembly's agenda without a public debate and a formal proposal from the Ministry of Justice. If the Government is not the proposer of the law, it may, in its opinion, propose to the National Assembly to either accept or reject the law in principle.

7.2 Amendments to the Criminal Code and Criminal Procedure Code

- Could you please share the answers to the clarification requests sent by the European Commission on 11 November 2025 regarding the draft amendments to the Criminal Code and the Criminal Procedure Code?

Ministry of Justice

Replies have been prepared to all questions and comments submitted by the European Commission regarding the Draft Law on Amendments and Supplements to the Criminal Code and the Draft Law on Amendments and Supplements to the Code of Criminal Procedure, and the same were sent to the European Commission on 14th January 2026.
Please find attached all replies of the Ministry of Justice related to the clarification requests of the European Commission.

- Could you please inform on whether it is planned to align these laws now fully with the EU *acquis* including on the PIF Directive or is there a staggered approach of gradual alignment with the EU *acquis* where complete alignment is foreseen for a later point in time?

Ministry of Justice

The Draft Law on Amendments and Supplements to the Criminal Code was sent to the European Commission along with Table of Compliance for an expert opinion in August 2024. In mid - November 2024, the comments of the EU experts were submitted to the Ministry of Justice. In the period from 1 October to 1 November 2024, four round tables were organized and an inclusive public debate process was held, in which judges, prosecutors, lawyers and professors participated. As a result of the interest of the general public, it was decided to organize another round of public debate. The public debate was held in the period from 10 September to 1 October 2025. The Draft Law on Amendments and Supplements to the Criminal Code was sent to the European Commission for comments on 15 October 2025. The clarification requests were sent by the European Commission on 11 November 2025 and the Ministry of Justice submitted all replies on 14th January 2026.

Only the relevant provisions of the Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law (the PIF Directive) that are related to the criminal legislation for which the Ministry of Justice is in charge were transposed i.e. the Draft Law on Amendments and Supplements to the Criminal Code has the provisions aligned with this Directive.

The adoption of the Law on Amendments and Supplements to the Criminal Code is planned for the 1st quarter 2026.

8. Fight against serious and organised crime and corruption, in particular high-level corruption, including pro-active investigations and prosecutions, freezing and confiscation of criminal assets, role and practices of security services in the investigation of serious and organised crime cases

- Please indicate the national budget allocated to capacity-building and equipment/infrastructure for the different services involved in the fight against serious and organised crime.

Ministry of Justice

The Ministry of Justice will conduct relevant activities regarding this issue in the future period of time through the analysis that will be conducted together with the European Union, Council of Europe and in that respect the Venice Commission and GRECO.

Ministry of Interior

The Law on the Budget of the Republic of Serbia for 2026 allocates 5,350,000,000 RSD, equivalent to 45,726,495 EUR, for the Ministry of Interior and the General Police

Directorate to enhance their capabilities. Furthermore, the budget plans to allocate 5,585,971,000 RSD (approximately 47,743,341.88 EUR) in 2027 and 6,687,071,000 RSD (around 57,154,452 EUR) in 2028.

The Public Prosecutor's Office for Organized Crime

In 2024 the amount of the annual budget of POOC was 4,306,804.84 EUR, in 2025 is 4,659,110 EUR and in 2026 planned amount is 4,751,424 EUR.

- Could you please provide an update regarding the use of the e-platform as the reporting tool for track record on organised crime, corruption and other serious crimes? In particular, please inform about why and where Serbia is facing any challenges with regard to the feeding of timely and comprehensive data. Please also provide an update on progress in feeding data into the case-tracker of the e-platform.

Supreme Court

The Supreme Court and competent courts enter relevant data into the e-platform concerning cases of corruption and organized crime.

Regarding statistical data, they have been collected by the Supreme Court. Certain challenge might be the fact that the requested data could not always been withdrawn from the case management system. Instead, the requested data can be determined only by examining case file, which is time consuming for courts.

In the previous period, courts faced certain challenges mostly in the initial phases of implementing the e-platform. Regarding the case-tracker, the challenges and issues that arose in relation to data entry have been resolved by creating specific new fields within the e- platform as part of case tracker (specifically the section dealing with first instance judgments based on plea agreements).

Supreme Public Prosecution Office

The Supreme Public Prosecution Office enters data into the e-platform in a timely manner and there are no difficulties related to data entry.

The Ministry of European Integration

The Ministry for European Integration coordinates the work of all institutions that feed data into the e-platform for the track record. Statistical data within the yearly overview are entered by the Supreme Public Prosecutor's Office, the Prosecutor's Office for Organized Crime, the Supreme Court and the Ministry of Interior, while cases within the case tracker are entered by the higher public prosecutor's offices and higher courts.

In essence, all problems that existed in the previous period have been resolved, and data entry is being carried out in line with the deadline agreed with the European Commission. Statistical data have been entered for the period from 2018 to 2024, while within the case tracker, cases covering period from 2022 to 2024 have been entered. Data covering 2025 will be entered in accordance with the deadline agreed with the European Commission.

The Public Prosecutor's Office for Organized Crime

The Public Prosecutor's Office for Organized Crime (POOC) currently has 4 delegated employees who have access to the E-platform. Meanwhile, ongoing cases covering 2024 were entered into dynamic part of E-platform (Cases Tracking) and statistics covering the period from 2018 to 2024 were entered into static part of the platform (Yearly Overview).

The data fed into platform will be updated periodically.

- Could you please outline which steps have been taken to systematically increase the seizure and confiscation of criminal assets, which includes both seizure of proceeds of crimes or their equivalent value and the systemic use of extended confiscation? Please give numbers for the entire year 2025. Please also provide an update on state of play regarding amendments to the Law on the seizure and confiscation of the proceeds of crime. As indicated in the comments shared on 15 October 2025, we reiterate the European Commission's readiness to be consulted on a revised version prior to adoption (a consultation that is needed in the context of the IBMs).

Ministry of Justice

Following the comments submitted by the European Commission to the Draft Law on Amendments and Supplements to the Law on Seizure and Confiscation of the Proceeds from Crime on 15 October 2025, certain amendments were made to the aforementioned Draft Law. In accordance with the request of the European Commission, that version was resubmitted to the Commission on 17 December 2025, and the Commission's response is awaited so that the law may be sent into the national legislative procedure. Additionally, on January 12th, 2026, the Ministry of Justice provided the European Commission with updated table of compliance.

During 2025, the Directorate for the Management of Confiscated Assets took over the management of the following assets:

Temporarily seized:

- 13 apartments;
- 10 garages and parking spaces;
- 1 commercial premises;
- 1 weekend/vacation property;
- 3 houses;
- Cash held in bank accounts;
- Jewellery and watches.

Total value of temporarily seized assets: EUR 6,684,580.00

Permanently seized:

- 11 apartments;
- 8 garages and parking spaces;
- 1 unfinished residential building;
- 1 apartment unit;
- 2 houses;
- 47 cadastral parcels;

- Cash held in bank accounts.

Total value of permanently seized assets: EUR 5,033,518.00

The Public Prosecutor's Office for Organized Crime

In May 2025, Chief Public Prosecutor for Organized Crime issued updated Mandatory Instruction on Organization of the Work in the POOC on the Conduct of Financial Investigations and the Seizure and Confiscation of Proceeds from Crime.

Specialization of public prosecutors for the implementation of financial investigations and engagement of financial forensic experts in the proceedings of the so-called extended confiscation of proceeds from crime, as well as the use of evidence from criminal investigations when conducting financial investigations, especially data obtained through the implementation of special evidentiary actions related to the interception of communications, contributed to better results in the seizure and confiscation proceeds from crime i.e. extended confiscation.

It is important to highlight that this Office in 2024 and 2025, in the course of tracing of the proceeds from crime which were transfered abroad, had cooperation with its counterparts in Austria, Spain, Montenegro, Denmark, Bosnia and Herzegovina and the United States. s a result of this cooperation, the defendants' assets abroad have been frozen, with an estimated value exceeding 6.5 million euros. We believe that all of these assets will be confiscated in the later stages of the proceedings.

By Annual Plan and Work Programme of the POOC it was envisaged to engage one more prosecutorial assistant (in addition to two currently engaged assistants) to assist specialized prosecutor for financial investigation and seizure and confiscation of assets.

Supreme Public Prosecution Office

In order to systematically increase the seizure and confiscation of criminal assets specialized training sessions on the seizure and confiscation of proceeds of crimes continued, with the participation of public prosecutors.

Supreme Court

The data on extended confiscation are not available. For the purpose of e-platform (for cases of corruption, organized crime and other serious crime) courts will provide the requested statistics for 2025 - on confiscation of assets on the base of the Law on Seizure and Confiscation Proceeds of Crime ("Official Gazette of the RS, no..32/2013, 94/2016 and 35/2019) and also on confiscation in accordance with the Criminal Code.

According to the previously established schedule, data in the e-platform should be entered by June 30, and therefore we are not able to provide the requested statistical data. Moreover the Annual report on work of courts has not been finalized yet.

- Please inform which steps have been taken to adapt Serbia's approach from investigating individual crimes to a broader strategy to investigate organisations, and from focusing on

cases of low or medium importance to high profile cases aiming at dismantling internationally active organisations and depriving them of their criminal assets through systematic tracking of money flows, and a consistent sentencing policy.

Supreme Public Prosecution Office

The prosecution office response to the detected risks is the adoption of Guidelines for acting in money laundering and terrorist financing cases dated 15 April 2025, with the aim of public acting in accordance with the assessed risks, and striving to eliminate and reduce the risks of money laundering, terrorist financing and proliferation, as well as to standardize the practice of public prosecutors' offices in money laundering cases.

Accordingly, the following priorities in the work of public prosecution offices have been determined:

1. Criminal prosecution of perpetrators of the criminal offense of money laundering whose predicate criminal offenses are tax evasion, tax fraud related to value added tax, illicit trade in excise products, abuse of position of responsible person, unauthorized production and distribution of narcotic drugs, criminal offenses of corruption in the public sector and criminal offenses of organized criminal groups, as well as medium threat criminal offences.

2. In all proceedings initiated for high and medium threat criminal offences, a parallel financial investigation shall be mandatory.

3. When acting in connection with information on suspicion of money laundering (SAR information), APML shall, as a priority, consider information relating to money laundering in connection with predicate criminal offences of high and medium threat.

4. In all cases of money laundering in which legal entities entities were used, consider the possibility of initiating proceedings in accordance with the Law on the Liability of Legal Entities for Criminal Offences, especially in situations where legal entities in the form of small and micro limited liability companies and entrepreneurs appear in connection with money laundering, as high risk forms of business entities for money laundering, when the structures of legal entities (e.g. property, equipment, funds, current account, business documentation, etc.) were used, and when a responsible person in a legal entity appears as the perpetrator of the criminal offense of money laundering (Article 245, paragraph 6 of the Criminal Code).

5. For legal entities that were involved in money laundering activities, obtain data on beneficial ownership and documentation related to the procedure for determining beneficial ownership, and if the conditions are met, initiate criminal proceedings under Article 45 of the Law on Central Records of Beneficial Owners.

6. In money laundering cases, analyze the method in which the criminal offense was committed, and in particular whether the obligated parties under Article 4 of the Law on the Prevention of Money Laundering and Financing of Terrorism were involved in the activities, and in the event of their participation, notify the supervisory authority.

7. When analyzing money laundering cases and collecting evidence, pay special attention to cases in which money laundering is carried out through sectors that have been assessed as having a higher level of threat by the money laundering risk assessment: real estate, organizers of games of chance and casinos, accountants, lawyers, notaries, real estate brokers and leasers, money changers, trade, car sales, pawnshops, as well as products and services of the banking sector and the digital asset sector.

8. When processing money laundering, the priorities in the proceedings are complex cases of money laundering by third parties, and in particular professional money laundering, which includes:

A) Money laundering by persons who commit this criminal act as a profession,

B) money laundering committed by so-called system guardians – tax payers and persons who possess special expertise in the field of money laundering and belong to the professions of bankers, accountants, tax advisors and lawyers.

9. Prosecute money laundering as a stand-alone crime when there is insufficient evidence for a specific predicate crime, and during the procedure it is determined that the actions taken by the defendant typologically correspond to known money laundering models and there is no evidence of legal origin for the property associated with money laundering.

10. Consistently seize proceeds of crimes associated with money laundering, and in the event that it is not found, it should be proposed to surrender it, or seize another asset of equivalent value.

11. In order to prevent the disposal of proceeds of crimes in order to avoid its seizure, all procedural powers in accordance with the law should be used (propose temporary security measures, temporary seizure, prohibition of disposal), and the measures imposed should be entered into public records (register of court injunctions and real estate cadastre).

12. In money laundering cases with elements of a cross-border threat, the necessary forms of international cooperation should be achieved with related countries in order to find, freeze, temporarily and permanently seize proceeds of crimes involved in money laundering.

13. In proceedings for the criminal offense of unauthorized construction under Article 219a. CC, collect data on the origin and amount of funds invested in illegal construction and, in the event that the legal origin is not clearly visible, notify the competent prosecutors office.

14. When, during casework, data is obtained on activities, transactions, sectors and other circumstances that indicate proliferation, misuse of the non-profit sector for the purpose of terrorist financing and terrorist financing, the Public Prosecution Office for Organized Crime should be notified.

The Public Prosecutor's Office for Organized Crime

In order to increase efficiency and pro-activeness in its work, the Public Prosecution for Organized Crime carries out a series of activities including

- specialization of prosecutors and other employees,
- improvement of inter-agency
- improvement of international cooperation and
- systematically tracing the proceeds from crime with full engagement of financial forensic experts and analysts.

The specialization of public prosecutors in the work on cases was conducted - on those who deal with organized crime, those who deal with high corruption, then terrorism and arms smuggling and financial investigations and confiscation of proceeds from crime.

In terms of improving inter-agency cooperation, Chief Prosecutor for Organized Crime established four permanent Task Forces (TF)– 1) TF to fight against organized crime and other particularly serious crimes (2020), 2) TF for the fight against people smuggling

(2016), 3) TF to fight against criminal offenses against the legal instruments with elements of organized crime (2019), and TF for detection and prosecution of members of organized crime groups who perpetrate criminal offense of money laundering (2024). Task forces are headed by the public prosecutors for organized crime, and members are representatives of all competent state bodies with the role in the area covered by scope of work of task forces. They have achieved significant results so far.

In February 2025 the fifth Task Force of investigation of financial flows related to the project of "Modernization and reconstruction of Hungarian-Serbian railway line Novi Sad - Subotica – state border (Kelebija)".

International cooperation was also intensified through: 1) bilateral and multilateral cooperation, 2) direct and informal cooperation, as well as through 3) participation in the work of joint investigative teams and conducting parallel criminal investigations.

From 2015 to 2024, the Public Prosecutor's Office for Organized Crime of the Republic of Serbia participated as members in 16 Joint Investigation Teams (JITs).

Joint Investigation Teams focused on criminal offenses committed by organized criminal groups. Specifically: 10 on the criminal offense of illicit production and trafficking of narcotics, 3 on the criminal offense of illegal border crossing and human smuggling, 2 on the criminal offense of counterfeiting currency and 1 on the criminal offense of aggravated murder. Two of these JITs also dealt with the criminal offense of money laundering. As a result of the work of 14 JITs, criminal proceedings were initiated in Serbia. In the case of the other two JITs, criminal proceedings were initiated in other JIT member states. All Joint Investigation Teams that dealt with organized crime offenses received support from Eurojust in their work.

In addition to these joint investigation teams, direct cooperation was established with European and the countries in the region. AS a result of our joint efforts organized crime groups were dismantled and criminal prosecutions were initiated in Romania, Estonia, Finland, Austria, Greece, Denmark, Germany, Switzerland, Bosnia and Herzegovina, Croatia and in Serbia.

Organized criminal groups are at the forefront of using the latest available technological methods to conceal their communication. The seizure of SKY ECC servers by the competent judicial authorities of the French Republic led to the discovery of millions of communications and exchanged information between members of organized criminal groups, which were shared with Serbian authorities through international legal assistance. These communications detailed their drug supply, transport, and distribution operations. To December 2025, the Public Prosecutor's Office for Organized Crime initiated criminal proceedings against 277 defendants in 22 cases where evidence from the SKY ECC application, provided via international legal assistance by the competent authorities of the Republic of France, was utilized.

Organized Crime Prosecution Office, whenever there are legal grounds, initiated financial investigations. In the course of this investigation prosecutors collected evidence and data on property, bank accounts and safe deposit boxes, data on income and expenses and traced financial flows of defendants or third parties as well as legal entities connected to them, in country and abroad.

Having in mind limited capacities and in order to achieve better results in the financial investigations, tracing the money flows and confiscation of proceeds from crime, this prosecution office carries out prioritization of money laundering cases in accordance with criteria set in the Mandatory instructions issued by the Chief Prosecutor. This Mandatory

instruction was updated in May 2025 in accordance with the results of the latest National Risk Assessments on Money Laundering and Terrorism Financing.

- As the operational autonomy of the prosecution and police from the Ministry of the Interior is not ensured either in law or in practice, could you please inform about plans to address this issue? How have the amendments to the Law on internal affairs been drafted to address this matter?

Ministry of Interior

The response to this question has already been addressed in the section of the document referring to the Law on Internal Affairs.

- As most interception equipment is located at the Security Information Agency (BIA), could you please inform about how do you plan to increase the technical capacities and resources of the police and prosecution to carry out special investigative measures without the help and involvement of BIA?

Office of the National Security Council and Classified Information Protection

Security Information Agency

Ministry of Justice

Joint comment:

The Republic of Serbia, through judicial reforms carried out in 2023, strengthened the independence of the judiciary and public prosecutors' offices. In addition, it implemented key normative reforms that separate the intelligence system from the criminal procedure system.

Therefore, under the provisions of the Law on the jurisdiction of authorities in combating the most serious forms of crime[7], the Security Information Agency (BIA) and the Military Security Agency (VBA) are 'formally excluded' from criminal investigations of the most serious forms of crime. The Law on Electronic Communications[8] contains judicial and proportional mechanisms. Accordingly, the role of BIA and VBA in special evidentiary actions under the Criminal Procedure Code (CPC)[9] is technical and auxiliary.

[7] **Law on the Organization and Competences of State Authorities in Combating Organized Crime, Terrorism, and Corruption ("Official Gazette of RS", Nos. 61/2005, 104/2009, 10/2023, and 10/2023 – other law)**

[8] Law on Electronic Communications ("Official Gazette of RS", No. 35 of April 29, 2023).

[9] Criminal Procedure Code ("Official Gazette of RS", No. 72 of September 28, 2011; No. 101 of December 30, 2011; No. 121 of December 24, 2012; No. 32 of April 8, 2013; No. 45 of May 22, 2013; No. 55 of May 23, 2014; No. 35 of May 21, 2019; No. 27 of March 24, 2021 – Constitutional Court; and No. 62 of June 17, 2021 – Constitutional Court).

When it comes to the "Monitoring Center," the Republic of Serbia is developing a multi-user model for its use, establishing clear rules on who, when, and why accesses the technical capacities, as well as maintaining a central record and audit.

With regard to plans to increase the technical capacities and resources of the police and the prosecution, an initiative has been launched by the Office of the Prosecutor for Organized Crime (OPOC) to regulate the application of special evidentiary actions. This initiative envisions strengthening the technical and personnel capacities of the police and the prosecution through phases of legal separation (special by-laws, logs, and oversight) and functional autonomy (different organizational units of the Ministry of Interior and judicial review).

Besides, it is planned to strengthen the capacities of oversight bodies, particularly judicial and parliamentary control, as well as the control exercised by the Ombudsman in matters concerning constitutionally guaranteed human rights. Furthermore, oversight will be carried out by the Commissioner for Access to Information of Public Importance and Personal Data Protection, in accordance with the 2018 Law on Personal Data Protection (which is harmonized with the GDPR and the "Police Directive"[10]).

In the matter of national security and the harmonized implementation of regulations and standards for the protection of personal data, as well as other regulations protecting human rights, in accordance with Article 5, paragraph 3 of the Law on the Bases of Security Services, it is particularly important to strengthen the supervisory function of the National Security Council. In addition, it is necessary to enhance the control of work with classified information in line with the Law on Classified Information[11], which is aligned with European standards for handling classified information. This includes strengthening the expert supervision of the Office of the National Security Council and Classified Information Protection, as well as the inspection supervision of the Ministry of Justice.

With regard to public oversight, the Republic of Serbia will work on the consistent implementation of the provisions of the Law on Free Access to Information of Public Importance, as well as on increasing the level of transparency in the work of the national security sector.

To conclude, the Republic of Serbia accepts European standards, while implementing security system reforms in the gradual and functional manner, and with full protection of human rights/ but implements security system reforms gradually, functionally, and with full protection of human rights.

[10] DIRECTIVE (EU) 2016/680 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection, or prosecution of criminal offenses or the execution of criminal penalties.

[11] Law on Classified Information ("Official Gazette of RS", No. 104 of December 16, 2009).

Ministry of Interior

No significant changes or activities compared to the previously submitted contribution, when it comes to the activities of the Ministry of the Interior.

The Service for the Application of Special Evidence Measures of the Ministry of Interior is responsible for administering and recording the documentation required for the application of special evidence actions, as well as coordination with other state authorities responsible for the protection of security and defense of the Republic of Serbia.

Plans for increasing the technical capacities and resources of the police are possible through the improvement of cooperation with telecom operators in the field of 5G network development, then through the development and implementation of software for the analysis of telecommunications traffic, as well as through the continuous education and training of police officers who conduct special evidence measures.

- Please inform about plans to ensure a clear separation of the mandates and regulations concerning the interception of communications for criminal investigation on the one hand, and for security purposes on the other. How has this been addressed in the proposed amendments to the Criminal Procedure Code and are there further legislative changes foreseen to phase out the role of the security services in criminal investigations? Please update on how the recommendations of the 2025 peer review on organised crime and corruption, with regard to this specific issue, have been/will be considered.

Ministry of Justice

The contribution of the Ministry of Justice was provided through a joint response of the Office of the National Security Council and Classified Information Protection, the Security Intelligence Agency and the Ministry of Justice.

Office of the National Security Council and Classified Information Protection

Security Information Agency

Joint comment:

There is already a clear separation between the above-mentioned competences, namely between intelligence analysis, criminal investigation, and evidence in proceedings, which are regulated by several different laws. Specifically, the Criminal Procedure Code regulates the interception of communications for the purposes of criminal investigations, which may be carried out by the police, the Security Information Agency (BIA), and the Military Security Agency (VBA), as technical executors of special evidentiary actions, but not as holders of proceedings and not as procedural parties. The procedural parties in the Republic of Serbia, when it comes to special evidentiary actions, are the public prosecutor's office and the competent court.

The problem in practice lies in the interpretation of Article 15v of the Law on the Security Information Agency (BIA), according to which intelligence information obtained by court order may be used as evidence in criminal proceedings. This, as such, creates confusion in

the analysis of legal norms, although practice is quite different. Namely, in practice such information are not used as evidence in criminal investigations, but are considered only as intelligence information.

In this respect, the Republic of Serbia will consider clarifying the provisions of Article 15v of the Law on the Security Information Agency (BIA), namely the secondary use of intelligence information through a new court decision, along with the introduction of additional mechanisms of control and transparency in line with the best practices of the European Court of Human Rights.

On the other hand, the interception of communications for security purposes is regulated by several laws. In addition to the Law on the Security Information Agency (BIA), there is the Law on the Military Security Agency (VBA) and the Military Intelligence Agency (VOA), which envisages explicit prohibition of the use of intelligence information as evidence in criminal investigations, provides a precise "catalogue" of criminal offences, and thereby assigns clear competence to the Military Security Agency.

When we speak about the competences of the Military Security Agency and the Military Intelligence Agency, they are already clearly normatively positioned as security and intelligence services with strictly limited operations. Therefore, this model demonstrates that the Republic of Serbia can implement a separation of competences without compromising national security.

The Republic of Serbia embraces European standards of the rule of law and the human rights protection, but must implement security system reforms gradually, functionally, and in accordance with the specific security environment. In the coming period, the Republic of Serbia will, through planned reforms, clearly separate intelligence, analytical, and criminal-procedural functions, while retaining limited operational capacities in exceptional security situations.

The aim of the reforms is not to achieve a formal similarity with any specific model in the EU, but to ensure the equivalent level of human rights protection, judicial oversight, and civilian control.

In line with the positions expressed under points 1 and 2, the Republic of Serbia has already clearly demarcated the intelligence and criminal-procedural lines in the field of organized crime and corruption, while further steps relate to technical and procedural harmonization. According to the Law on the Competence of Authorities in Combating the Most Serious Forms of Crime, the lead institutions are the Office of the Prosecutor for Organized Crime, the police, and other public prosecutors' offices, whereas the roles of the Security Information Agency and the Military Security Agency are retained as technical implementers of special evidentiary actions under the Criminal Procedure Code, but not as holders of proceedings and not as procedural parties.

The role of the Security Information Agency and the Military Security Agency in special evidentiary actions under the Criminal Procedure Code is technical and auxiliary, and the Republic of Serbia will ensure further normative clarification that such actions do not produce evidentiary material without the mediation of the prosecution and the courts.

The Republic of Serbia embraces European standards, while carrying out security sector reforms in a gradual and functional manner, ensuring the full protection of human rights.

Ministry of Interior

No significant changes or activities compared to the previously submitted contribution, when it comes to the activities of the Ministry of the Interior.

The Service for the Application of Special Measures, of the Ministry of Interior, as well as other state authorities responsible for the protection of security and defense of the Republic of Serbia, and in the matter of regulations concerning the interception of communications, acts in accordance with the Constitution of the Republic of Serbia, the Code of Criminal Procedure, the Law on Electronic Communications and the Rulebook on Requirements for Devices and Program Support for the lawful interception of electronic communications and the retention of data on electronic communications.

- As regards pro-active criminal investigations against the most profitable crimes including trafficking in drugs, firearms, human beings and money laundering, please inform about steps taken and plans to apply consistently a "follow the money approach".

The Public Prosecutor's Office for Organized Crime

It is important to highlight that Prosecutor's Office for Organized Crime in every pre-investigation and investigation proceeding, as well as criminal investigation, collects data about financial profile of the offenders (suspects) including data about their incomes, movable and immovable property, as well as data about money flows related to concrete acts of a criminal offense, with the aim to determine actual material gain/damage acquired by committing criminal offense, in order to, ultimately, it would be confiscated through court decision (judgment).

In addition to data on the financial profile of the defendants, data on money flows is also collected - the turnover on the accounts of both legal and natural persons obtained from financial institutions and the documentation that served for recording accounting changes is analyzed. Also, it was carried out analysis of tax returns, application for registration of legal entities from the founder, authorized persons for asset management, beneficial owner, but also documentation obtained through international legal assistance related to financial transactions, registration and property of legal and natural persons abroad.

As a part of a criminal investigation, during pre-investigation and investigation, for establishment relationships between organizers and members of criminal alliance, were also used competences regarding investigation of financial and money flows pursuant to articles 143-146 of the Criminal Procedure Code. Checking Accounts and Suspicious Transactions encompass acquiring data from a bank or other financial organisation on accounts a suspect has or controls and the funds in those accounts. Public prosecutor may request a court to order the monitoring of suspicious transactions or to to temporarily suspend the performance of a suspicious transaction.

The Chief Public Prosecutor for Organized Crime in May 2025 updated the Mandatory Instruction on Prioritization of Money Laundering and Terrorist Financing Cases. When determining priorities in casework, prosecutors handling the cases take into account:

1. Criminal offenses of a higher degree of threat for money laundering (criminal offenses of a high and medium degree of threat)

2. Forms of companies marked with a higher level of threat

3. Assessment of sectoral risks and exposure of certain activities to money laundering

4. Crimes that pose a growing threat to money laundering

When acting in connection with the criminal acts of ML/FT, it is necessary to review each time whether there is a basis for initiating criminal proceedings against a legal entity, and that such proceedings are initiated in all situations where the conditions from the Law on Liability of Legal Entities are met for criminal acts. This especially applies to situations when the structures of legal entities (e.g. property, equipment, funds, current account, business documents, etc.) were used to commit the aforementioned criminal acts and when the responsible person in the legal entity appears as the perpetrator of the criminal offense of money laundering (Article 245 paragraph 6 of the Criminal Code).

The instructions also state that it is necessary to conduct a financial investigation focused on the analysis of money flows and financial transactions, connections with legal and natural persons, etc., in every criminal investigation case, in order to parallel and simultaneously, with the criminal investigation and within it enabled the detection of elements of the criminal offense of money laundering.

In addition, bearing in mind the conclusions from the National risk assessment of money laundering and terrorist financing and the growing risk of using and abusing digital assets for the purpose of AML/CFT, it is necessary to check all available data on the products and services used, as well as whether the sectors that carry a higher ML/FT risk in the digital assets sector.

The Public Prosecutor's Office for Organized Crime engaged specialized prosecutors and financial forensic experts as mentioned in previous answers. It also uses results of the application of special evidentiary measures when conducting financial investigations. In order to trace proceeds from crime transferred abroad, it exchanges information and MLA requests with its counterparts in other countries.

Financial forensic experts are engaged in criminal investigations but also in financial investigations in the extended confiscation procedure. The follow the money flows, i.e. analyse documentation related to cash flows of both legal and natural persons obtained from financial and payment institutions, analyze accounting documents, performs analysis and binding of documentation used to record changes in ledgers, documents related to tax returns, then registration of legal entities from founders, authorized persons for managing funds and the beneficial owners of legal entities, applications related to the capital market, as well as documentation obtained through international legal assistance related to financial transactions, registration and property of legal and natural persons abroad. In this sense, based on the results of the analysis they perform, financial forensic experts indicate to the prosecutors that it is necessary to obtain additional documentation, data or evidence, in order to obtain a clearer and more precise picture of the way the crime itself was committed and the financial flows.

In addition, results of the investigation – evidence collected during the investigation which is conducted in regard to committing particular criminal offence, especially

evidences collected via application of special investigative measures, were used in financial investigation. On grounds of that we expanded and detected new assets of the offenders which can be object of confiscation. In practice, it turned out to be a very significant collection of evidence through the use of special investigative measures - intercepted communications between members of an organized criminal group that refer to property whose actual owners are the defendants, even though the aforementioned property is formally attributed to other persons.

Supreme Public Prosecution Office

All training courses, as well as the aforementioned Guidelines and Practicum for financial investigations, emphasize the importance of the "follow the money" approach and the necessity to initiate financial investigations when committing criminal offenses result in unlawful material gain. In that case financial investigation has triple objective:

1. Detecting criminal offenses and perpetrators;

2. Collecting evidence;

3. Seizing proceeds of crimes.

This is specifically emphasized in the aforementioned Guidelines for acting in money laundering and terrorist financing cases issued by Supreme Public Prosecution Office as of 15 April 2025.

- Please inform about developments when it comes to money laundering investigations, prosecutions and convictions, especially with regard to the stand-alone money laundering offence (i.e., where the predicate offence does not need to be proven).

Supreme Public Prosecution Office

When it comes to money laundering investigations and indictments, Serbia has recorded a constant increase in the number of cases for the period from 2019 to 2024.

The total number of investigations in this period is 1295, and the total number of indictments is 685, while in the period from 2022-2024, the efficiency of money laundering investigations that resulted in indictments has significantly increased, and out of a total of 633 investigations initiated in this period, 463 indictments resulted, which means that the conversion of investigations into indictments is over 73%.

When it comes to indictments, in the period from 2019-2023, there is an increase in the number of indictments for cases of money laundering by third parties compared to self-laundering. Specifically, 119 indictments relate to self-laundering, while the number of charges for money laundering by third parties is 149.

In the period from 2019 to 2024, the number of standalone money laundering cases has recorded a constant growth trend, and in the indicated period a total of 336 people were charged with this form of money laundering, which is almost 50% of all charges.

The Public Prosecutor's Office for Organized Crime

The Chief Public Prosecutor for Organized Crime in May 2025 updated the Mandatory Instruction on Prioritization of Money Laundering and Terrorist Financing Cases (more detailed explained above). This Mandatory instruction was updated in May 2025 in accordance with the results of the latest National Risk Assessments on Money Laundering and Terrorism Financing.

In addtion, in May 2025, Chief Public Prosecutor for Organized Crime issued updated Mandatory Instruction on Organization of the Work in the POOC on the Conduct of Financial Investigations and the Seizure and Confiscation of Proceeds from Crime. This

In 2025 Prosecutor's Office for Organized Crime initiated investigations for the criminal offense of money laundering against 38 persons (against 20 persons for ML with the predicate criminal offense, 9 for stand-alone and 9 for third party ML) and raised indictments against 17 persons (against 3 persons for ML with the predicate criminal offense, 8 for stand-alone and 6 for third party ML).

Supreme Court

According to data of provided by Higher Courts - four special departments for suppression of corruption and Special Department for organized crime with regard to money laundering (Art. 245 of the Criminal Code) during 2025 there were 76 final convictions for money laundering. These are preliminary data, since Annual Report on Work of Courts has not been finalized yet.

- Please inform on whether proof of inexplicable wealth is used as circumstantial evidence in the prosecution of money laundering cases and if not what the main impediments are. Please could you provide statistics?

Supreme Court

In the Republic of Serbia, evidence of 'unexplained wealth' is increasingly used as indirect (circumstantial) evidence in criminal proceedings for money laundering. Although merely possessing unexplained assets is not a criminal offense in itself, it serves as an essential element to prove that the assets originate from illegal sources.

Evidence of unexplained wealth is used as significant circumstantial (indirect) evidence in criminal proceedings for money laundering, as well as in the context of seizure and confisaction of assets resulting from criminal activity.

In the area of economic crime and money laundering indirect evidence has primary importance. Courts analyze cash flows, the inconsistency between income and assets, and suspicious transactions, in order to draw conclusions about the existence of intent and the commission of the criminal act.

USING INDICATIONS OF INEXPLICABLE WEALTH AS INDIRECT EVIDENCE IN PRACTICE - METHODOLOGY

In criminal cases, when the public prosecution cannot directly prove a specific prior criminal act (e.g., the exact date and time of drug dealing), it relies on financial disparities. If the defendant possesses assets that far exceed their legal income and has no credible explanation for their origin, this combined with other facts, is used as an element in proving the criminal source of the money.

APPLICATION OF LEGAL FRAMEWORK IN PRACTICE

• Circumstantial evidence: Courts use the discrepancy between the legal income and the actual assets of an accused, along with other evidence, to form a belief in the illegal origin of funds.

• Interplay with other laws: The Law on the Examination of the Origin of Assets and Special Tax enables the Tax Administration to identify assets whose origins cannot be explained by taxable income, which can serve as an initial trigger for a criminal investigation into money laundering.

• Case law: In accordance to the jurisprudential standard it is sufficient to prove that the assets originate from criminal activity for the purpose of obtaining a conviction of money laundering, which is often established precisely through the analysis of unexplained wealth as circumstantial evidence .

As previously indicated, regarding the element of "knowledge" that the assets originate from a criminal activity, it is sufficient that the activity is classified as a criminal offense (criminal activity) and that the assets derived from an unlawful act. Existence of a conviction for the predicate criminal offense is not necessary; it is sufficient to refer to the commission of the predicate act, which does not need to be specified in detail.

What is important is that there is no de facto procedural reqirement to identify the perpetrator of the predicate criminal offense (since that would otherwise provide with no result in criminal practice). A predicate criminal offense is defined as any criminal offense generating financial gain.

Obstacles arising in practice:

- Burden of proof: In criminal proceedings, the burden of proof lies with the public prosecutor according to the standard of full certainty ("beyond a reasonable doubt"), as prescribed in Article 16, paragraph 3 of the Criminal Procedure Code. Compelling the accused to explain the sources of wealth may conflict with their right (provided for in the Article 68, paragraph 1, point 2 of the Criminal Procedure Code) to remain silent (as part of the right to defense), as well as with the presumption of innocence. In this regard, in recent case law of the courts in the Republic of Serbia, the decision of the European Court of Human Rights in the case of Šušen v. Belgium is also considered.

- Privilege of the accused against self-incrimination: Statements made in civil (or other) proceedings (e.g. statements made in proceedings before the Tax Administration, regarding the examination of the origin of assets, and obligation of cooperation) that relate to unexplained wealth often cannot be used directly in criminal prosecution to ensure procedural rights.

- Indirect use: A statement given in tax proceedings (where there is an obligation to cooperate) cannot be used directly, for example, as evidence of an admission of guilt in criminal proceedings, if doing so would violate the defendant's constitutional privilege against self-incrimination. However, that information can serve as a basis for initiating an investigation and collecting other, independent evidence in accordance with the Criminal Procedure Code. Information from other proceedings related to unexplained wealth is used in practice as indirect evidence (starting point for public prosecution), but statements cannot be directly transpose as an "admission" in criminal proceedings without considering procedural guarantees (e.g., warning about the right to remain silent).

- Complexity of investigation: Stage of "layering" money and the use of offshore structures make the collection of sufficiently strong indirect evidence in practice very complex and expensive.

According to the standpoint of the Supreme Court, to establish a conviction based on indirect evidence, the following conditions must be met: It must be established in an indisputable manner; it must form a closed circle, so that only one logical conclusion about the decisive fact can be drawn from it.; The court is due to lay out in -depth in the reasoning of the judgement how it assessed each individual piece of indication and their interplay.

For the application of all the above standards, the "Guidelines for the Use of Indirect Evidence " mentioned in previous reports, are of significance.

Namely, with the support of the European Union within the IPA 2019 project "Support to Serbia in Achieving the Objectives of Chapter 24: Justice, Freedom, and Security" (EU for the Fight Against Serious and Organized Crime), this publication was drafted, in practice commonly referred to by the shorter title "Guidelines for the Use of Indirect Evidence."

This publication entails chapters related to the evidence required for initiating court proceedings concerning criminal liability for money laundering, the degree of the perpetrator's culpability, distinction between a predicate act and «criminal activity», types of evidence (documentary, witnesses, with a special focus on whistleblowers, digital evidence, indicators of money laundering in the form of cryptocurrencies), procedural safeguards and respect for human rights (the presumption of innocence and the right of the accused to remain silent as parts of the right to a fair trial, the right to respect for private and family life), the rights of third parties, and special conditions for assets confiscation.

The publication also lists the most important international sources of law (international treaties and instruments), as well as relevant case law of the European Court of Human Rights, the Court of Justice of the EU, and selected comparative case law of the highest courts of the specific European countries.

Conclusion

Supreme Court has noted on several occassions, as well as during its preparation for previous sessions of Subcommittees for Justice, Freedom and Security, that the circumstantial evidence is commonly used in the case law of courts in Serbia. We previously refered to the adopted legal standings in this regard. However, conviction typicaly is not based solely on circumstantial evidence, consequently, statistical data on use of circumstantial evidence cannot be collected, therefore it remains impossible to statistically present the number of those cases wherein the circumstatial evidence had been assesed by courts. Issues of use of circumstantial evidence arises increasingly in practice, and accordingly there were such cases in which the public prosecutors have been relying upon the circumstantial evidence in order to prove the elements of criminal offense. However, it remains up to the court to assess presented evidence in each case.

Supreme Public Prosecution Office

Criminal proceeding for money laundering is initiated when evidence of regular sources and acquisition of assets of unknown origin is not collected. In such situations, when the manner of acquisition of the assets corresponds to known typologies of money laundering, criminal proceedings are also initiated for the ML. Examples of such practice include final judgments given in connection with cash found during undeclared cross-border cash

transfers or the discovery of significant amounts of cash in the possession of persons associated with criminal activities.

According to the data obtained from criminal proceedings in the investigation phase, indictment phase and final judgments, it can be stated that Serbia is processing money laundery arising from inexplicable wealth - conducting criminal proceedings for money laundering whose origin is not directly linked to any predicate criminal offense, but is treated as property of unknown origin. This is the result of Serbia's activities, especially in compliance with the FATF recommendations, signed international documents, in particular the Warsaw Convention, and taking into account the conclusions from the evaluation of the Moneyval system for the prevention of money laundering. As a first step, Serbia amended the legal framework and definition of the criminal offense of money laundering, by linking the origin of property related to money laundering to criminal activity and the application of this amended criminal offense began on 01.03.2018. After the change in the legal framework, numerous training sessions were held on the results of the NRA, presenting the practice of EU countries in processing money laundering, primarily the Netherlands, Belgium, Spain and Italy, and numerous activities were carried out from the action plans adopted in connection with the results of the NRA and the Strategy for the Prevention of Money Laundering. In order to facilitate and better understand the money laundering process, the Typologies of Money Laundering in Serbia were published. Thanks to this, a significant change occurred in the processing of money laundering, as the larger number of investigations, indictments and verdicts were issued in connection with money laundering without a predicate criminal offense (standalone ML). In all these cases, initial suspicions were directed towards assets of unknown origin, the acquisition, transfer and holding of which corresponded to known methods of money laundering.

In order to maintain the achieved level and further improve it, the financial forensics service should be further developed, the legal framework for conducting financial investigations should be redefined, and cooperation between law enforcement and judicial authorities with Administration for the Prevention of Money Laundering, the Tax Administration, the Anti-Corruption Agency, and the Public Procurement Office should be constantly developed.

- Please could you provide data on the number of financial investigations started in 2025 and their outcomes?

The Public Prosecutor’s Office for Organized Crime

In the period from January 1, 2025 to December 26, 2025, the Public Prosecutor's Office for Organized Crime issued a total of 20 orders to initiate financial investigations in accordance to the Law on Seizure and Confiscation of Proceeds from Crime in relation to 178 defendants, third parties and 2 legal persons. Detailed statistics related to outcomes of the financial investigations will be available upon finalization of the annual report.

In addition to that, parallel financial investigations were led in five cases against 55 defendants.

- Please could you provide an overview of results in the investigation of money laundering following the establishment of the permanent task force on money laundering cases within the Prosecutor's Office for Organised Crime.

The Public Prosecutor's Office for Organized Crime

After the establishment of the Permanent Task Force for detection and prosecution of members of organized crime groups who perpetrate criminal offense of money laundering investigations against 17 persons were initiated and 17 defendents were indicted. Task Force is active in several preliminary investigation proceedings, the results of which are expected in the coming period.

Since in February 2025 it was established Task Force for investigation of financial flows related to the project of "Modernization and reconstruction of Hungarian-Serbian railway line Novi Sad - Subotica – state border (Kelebija)", whose members were also members of the Permanent Task Force for ML investigations, activities of the two task forces overlapped. As a result of work of this latest Task Force it was initiated investigation against 14 persons for predicate criminal offense and against 6 persons for money laundering (as a secondary criminal offense).

- Please could you inform about the reasons for the fact that new investigators were not assigned to the Task Forces for investigating financial flows related to the modernisation and reconstruction of the railways (Novi Sad train station canopy) case within the Prosecutor's office for organised crime, after the investigators were withdrawn due to new systematisation within the police. Please could you inform about why the Directors of the Tax Administration and the Administration for the Prevention of Money Laundering withdrew the given consents for the members of the Task Force and did not give consent for the appointment of new members. Please could you inform about why the police, tax administration and Administration for the Prevention of Money Laundering are not submitting the evidence that the Task Force had collected in its work up to that point, and not undertaking all requested actions and measures within their jurisdiction, as requested by the Prosecutors' office for organised crime.

The Public Prosecutor's Office for Organized Crime

On February 28, 2025 it was formed the Task Force for investigation of financial flows related to the project of "Modernization and reconstruction of Hungarian-Serbian railway line Novi Sad - Subotica – state border (Kelebija)", headed by organized crime prosecutors (4 prosecutors). In addition to two financial forensics experts and two prosecutorial associates from the Public Prosecutor's Office for Organized Crime, members of the Task Force were 17 police officers from various organizational units of the Ministry of Interior (MoI), 7 tax police officers from the Tax Administration, 1 employee of the Administration for the Prevention of Money Laundering of the Ministry of Finance, 2 representatives from the Business Registers Agency. These were experienced investigators proposed by the PPOOC, considering their professionalism and extensive experience in similar cases and cooperation with this public prosecutor's office. Given that this Task Force was formed for a specific case, its initial mandate was six months, with a tendency for extension.

However, when consent for the extension of the Task Force mandate and members' engagement was sought, the Director of Police first withdrew consent for the 17 police officers, and very quickly (simultaneously) the Director of the Tax Administration withdrew consent for the 7 tax police officers and the Director of the Administration for the Prevention of Money Laundering withdrew consent for their representative. Meanwhile, the Business Registers Agency replaced the experienced officials, who had participated from the beginning and were proposed by the prosecutor's office, with new

ones. This action severely hampered the Task Force's work, as only representatives of the prosecutor's office remained active.

Furthermore, the competent authorities that had representatives in the Task Force have not provided and refuse to deliver part of evidences collected by the Task Force during its work. After POOC insistence and urgency, part of missing evidences was delivered but still not entire package. Since the Task Force is not operative since September, the former members of the Task Force do not undertake actions and measures based on request of the POOC, which makes further work on this case less efficient.

The Ministry of Finance/The Administration for the Prevention of Money Laundering

Taking into account the questions relating to the Tax Administration, Tax Police Sector, it is necessary to point out the following:

Acting in accordance with the request of the Prosecutor's Office for Organized Crime, the Tax Administration, Tax Police Sector engaged significant human and material resources with the aim of detecting tax-related criminal offenses and their perpetrators, within the task force for investigating financial flows related to the project "Modernization and Reconstruction of the Hungarian–Serbian Railway Line on the Novi Sad – Subotica – State Border (Kelebija) route."

Based on the measures and actions undertaken by the Tax Police Sector during the pre-investigation proceedings, a joint criminal complaint was filed by the Tax Police Sector and the Ministry of Internal Affairs, predominantly concerning criminal offenses, for the detection of which, the Tax Police is not competent.

In addition to the above, it is important to emphasize that the task force was established for a six-month period, during which the Tax Police undertook all necessary measures and actions within its jurisdiction.

It is also to be noted that the Tax Police Sector has submitted to the competent prosecutor's office all evidence that Tax Police officers have obtained to date through evidentiary actions carried out during the pre-investigation proceedings.

In their work so far, Tax Police officers have acted upon the request of the competent public prosecutor, and should further actions in the case indicate the existence of grounds for suspicion regarding the commission of tax-related criminal offenses, the Tax Police Sector will undertake all prescribed measures and actions with the aim of detecting tax-related criminal offenses and their perpetrators.

With respect to questions why director of the Administration for the Prevention of Money Laundering withdrew the given consent for the member of the Task Force and did not give consent for the appointment of new members, and why the Administration for the Prevention of Money Laundering is not submitting the evidence that the Task Force had collected in its work up to that point, and not undertaking all requested actions and measures within their jurisdiction, as requested by the Prosecutors' office for organised crime, it should be pointed out:

In order to avoid any misinterpretation: the Administration for the Prevention of Money Laundering (APML) did not withdraw its consent for participating in the Task Force. The APML had to inform the Public Prosecutor's Office for Organised Crime (PPOOC) that

the specific APML staff member had to withdraw from the Task Force for personal and professional reasons and that, if requested by the PPOOC, the APML would offer a replacement.

Please bear in mind that the APML is an administrative body (administrative-type FIU) under the Ministry of Finance, and does not have the power to collect evidence. It only receives, analyses and disseminates financial intelligence. APML information is not used as evidence or in any formal proceedings.

APML does undertake the actions and measures within our jurisdiction, as requested by PPOOC, in accordance with the relevant legislation and in line with the usual practice.

- Please provide an update on any plans to adopt a case/workflow management system and an intelligence management system for police services.

Ministry of Interior

Steps are currently being taken to address one of the main gaps for the alignment with the Directive (EU) 2023/977, which is the absence of the case management system for the use of SPOC for international police cooperation.

Considering the fact that a CMS software is currently being developed for the Division for the Criminal Analysis of the Criminal Police Department under the OSCE Project entitled "Enhancing the capacities of the Ministry of Interior in combating serious and organized crime and corruption through establishing Case Management System" as well as that since 2023, the Serbian SPOC has been part of Criminal Police Department, an initiative has been launched that a CMS for the use of SPOC, which would be the module of the CMS software currently being developed and compatible with the CMS being developed for the entire ministry (KAIS), should be created within the same project. As the duration of the mentioned project has been extended until 2027, steps are being taken to signing the addendum to the project agreement so as to include the SPOC in the project and the establishment of the CMS for it.

Meanwhile, two documents have been drafted, one of which extensively describes the work flow of the SPOC and all the business processes the future CMS should cover, while the other document lists in detail all the equipment required for the functioning of the CMS.

The funding for the development of the software by an outsource company will be provided by the United Kingdom (N.B. the funding was to be provided by the US INL Bureau, but it is suspended for the time being), while the required equipment will be provided by the Regional IPA EU4FAST WB project. The prediction is that the CMS will be fully operational by the end of 2027.

8.1 Cooperation in the field of drugs

- As it was indicated last year that an Operational Plan for the prevention of drug abuse (2025-2028) was expected to be adopted in Q1 2025, could you please inform on the foreseen timeline to finalise preparation and adoption of this document?

Ministry of Health

Given that the adoption procedure requires obtaining opinions from the current year, a repeated procedure for obtaining opinions on amendments to the draft Operational Plan is

planned for early 2026, and adoption is planned for the first quarter of 2026. The amendments have been prepared with the aim of improving the program in line with the planned activities of the European Union Drugs Agency (EUDA).

Ministry of Interior

The new strategic document draft "Operational plan for the prevention of drug abuse for the period 2025-2028" has been completed in terms of content and awaiting on the process of formal adoption.

- Please provide an update on amounts of illicit drugs seized and destroyed per type of drugs in 2025. This amount also needs to be encoded in the e-platform.

Ministry of Interior

In 2025, a total of 4 process of destruction of PACS were conducted and a total of about 5,3 tons and about 2,4 million of pieces of different drugs were destroyed.

Of the stated total amount of destroyed drugs, among other types of drugs, 5,093,673.7 g of marijuana; 50,930.82 g of heroin; 27,585.08 g of cocaine; 66,260.91 g of amphetamine; 7743.69 g of MDMA were destroyed.

- Could you please inform about plans for legislative amendments that would allow only a sample of the seized drugs to be kept as material evidence during proceedings? Please provide an update on the state of play as regards the new National Drug Strategy in order to further align Serbian national legislation with the EU *acquis.*

Ministry of Justice

The Draft Law on Amendments and Supplements to the Criminal Procedure Code was sent to the European Commission along with Table of Compliance for an expert opinion in August 2024. In mid - November 2024, the comments of the EU experts were submitted to the Ministry of Justice. In the period from 1 October to 1 November 2024, four round tables were organized and an inclusive public debate process was held, in which judges, prosecutors, lawyers and professors participated. As a result of the interest of the general public, it was decided to organize another round of public debate. The public debate was held in the period from 10 September to 1 October 2025. The Draft Law on Amendments and Supplements to the Criminal Procedure Code was sent to the European Commission for comments on 15 October 2025. The clarification requests were sent by the European Commission on 11 November 2025 and the Ministry of Justice submitted all replies on 14th January 2026.

Given that this Law is intended to resolve the aforementioned issue, please note that during the preparation of the text, various proposals were made regarding this matter. Furthermore, it will be subject to additional analysis before the final text of the Draft Law on Amendments and Supplements to the Criminal Procedure Code enters into the national legislative procedure.

The adoption of the Law on Amendments and Supplements to the Criminal Procedure Code is planned for the 1st quarter 2026.

Ministry of Health

In accordance with the activities set out in the NPAA, the bearer of activities for the preparation of the Drug Strategy is the Office for the Fight against Drugs.

In this regard, the Ministry of Health will send an initiative to the Office for the fight against drugs to, in accordance with the Regulation on the establishment of the Office for the fight against drugs and the competences of the Office, implement an operational process for the development of a strategy, which includes the establishment of a working group, the development of a strategy proposal and obtaining the opinion of competent institutions for the implementation of the strategy. After the process is completed and the final proposal of the strategy is drawn up, the Ministry of Health will implement the strategy adoption procedure.

Ministry of Interior

There are no notable changes to the contributions compared to those submitted for the previous Subcommittee meeting, in March 2025.

Previously, in 2017, for the first time, the Ministry of the Interior initiated the amendment of the Criminal Procedure Act in the part related to the destruction of confiscated psychoactive controlled substances. This initiative still has not been adopted, the challenge is the complicated and slow procedure for amending the law.

The last Strategy for Drug Abuse (2014 – 2021) was expired in the end of 2021. The aforementioned Operational plan is temporary solution and after that a working group will be established to develop a new Strategy in the field of drug abuse prevention for 2027-2031, and it is expected that the draft document will be completed by the end of 2026.

- Please inform on the efforts made to step up the fight against illicit drug trafficking, especially with the active participation in actions of the EMPACT CCH and SYN/NPS Operational Action Plan.

Ministry of Interior

Serbia actively participates in the six points of EMPACT that concern the fight against drug trafficking. In the activity 2.2 Balkan cartel, participates as a collider.

In the activities in which CEPOL is the leader, Serbia will make its contribution as a participant, bearing in mind the multi-year work of organizing trainings in NC "Mitrovo Polje", which a team of trainers from Serbian police successfully implements both with colleagues from Serbia and with foreign police officers who work on the line of combating drug trafficking.

Serbian National Forensic Center performs indirect participation in EMPACT, by making contributions in chemical analysis and identification of synthetic drugs and NPS, thus enhancing tailoring of the further activities within the EMPACT programme.

8.2. Trafficking in human beings

- Please provide an update on steps taken to improve Serbia's track record of investigations and prosecutions for trafficking in human beings, in particular for the purpose of sexual and labour exploitation. Please update the statistics collected through the e-platform.

Supreme Public Prosecution Office

During 2025, for criminal act Trafficking in human beings under Article 388 of the CC, public prosecutions commenced investigations/evidentiary actions against 29 persons, indictments were filed against 32 defendants, convictions were rendered by courts against 29 defendants.

E-platform will be update by 30 June 2026.

In order to improve track records of investigation and prosecution for trafficking in human beings during 2025, public prosecutors designated as contact persons for cases of trafficking in human beings attended various seminars, conferences and workshops:

- EU4FAST, Workshop on the use of special evidentiary measures and financial investigations in human trafficking and smuggling cases, 14-16.01.2025, Arandjelovac
- UNODC, Workshop "System Analysis and Planning for Suppression of Networks Involved in Migrant Smuggling, Human Trafficking and Drug Trafficking on the Balkan Route", 11-13.03.2025, Belgrade
- IOM, Training on Conducting Digital Investigations in Cases of Human Trafficking and Smuggling of Migrants, 24-26.03.2025, Niš
- EU4FAST, Roundtable for Prosecutors on Migrant Smuggling and Human Trafficking, 27-28.03.2025, Divčibare
- IOM and EU4FAST, 4th Regional Meeting of Task Forces and Key Stakeholders in the Fight against Migrant Smuggling and Human Trafficking, 07-08.04.2025, Budva, Montenegro
- Judicial Academy and Council of Europe, HELP Online Course on Human Trafficking, 22.04-22.06.2025
- EU4FAST, round table for prosecutors on migrant smuggling and human trafficking, 27-28.05.2025, Sokobanja,
- ASTRA, discussion forum "Position and rights of victims of human trafficking in criminal proceedings", 05.06.2025. Belgrade
- ATINA, Seminar "Neuroscience in the Service of Investigation and Trial: Communication with Potential Victims of Human Trafficking", 10, 12 and 17.06.2025, Belgrade
- Eurojust, EU4FAST, Meeting of the Focus Group of Prosecutors and Judges on Combating Trafficking in Human Beings, Subgroup Western Balkans, 11-13.06.2025, Sarajevo, Bosnia and Herzegovina
- EU4FAST, Workshop: Human Trafficking, with Special Reference to the Liability of Legal Entities, 25.06.2025, Belgrade

- Ministry of Labour, Employment, Social and Veteran Affairs, training “Recognizing cases of trafficking in human beings and support for victims”, 30.07.2025, Belgrade
- EU4FAST, round table for contact points for trafficking in human beings on the topic “Conducting financial investigations”, 25.09.2025, Belgrade
- EU4FAST, study visit on migrant smuggling and trafficking in human beings, 13-17.10.2025, Eisenstadt, Austria
- EU4FAST, Regional Workshop on Strengthening Cooperation and Best Practices on Child Begging and Child Trafficking, 28.10.2025, Tirana, Albania
- UNODC, Regional Training on Advanced Digital Investigative Techniques on Human Trafficking for Sexual Exploitation, 04-05.11.2025, Sarajevo, Bosnia and Herzegovina
- Judicial Academy, EU4FAST, Workshop "Strengthening the Response to Human Trafficking for Labour Exploitation", 17-18.11.2025, Belgrade
- CEPOL Webinar "Detecting and Investigating Child Trafficking for Exploitation by Criminal Networks", 27.11.2025
- Europol, EU4FAST, European Forum against Trafficking in Human Beings - Fight against Organised Crime and Protection of victims, 03-04.12.2025, Stockholm, Sweden

Ministry of Labour, Employment, Veterans and Social Affairs

The Labour Inspectorate carries out regular, extraordinary, control and supplementary inspections in all sectors, and in high-risk sectors where human trafficking for the purpose of labour exploitation can be expected (construction, agriculture, hospitality, hotel industry, services), enhanced inspections are organized and carried out, both independently and with other inspectorates and authorities, in order to determine the possible existence of human trafficking for the purpose of labour exploitation. The Labour Inspectorate organizes and implements enhanced extraordinary inspections in a specific sector and in a specific territory, both during regular working hours, at night and on weekends and holidays, often according to the principle of the so-called "rotation" of labour inspectors, which actually means that inspectors also carry out inspections in the territory where they do not normally work.

Since March 2017, the Labour Inspectorate has been actively participating in the project "Preventing and Combating Trafficking in Human Beings in Serbia" - a joint support program of the European Union and the Council of Europe for the Western Balkans and Türkiye.

Within the project, basic and advanced trainings for labour inspectors were implemented, as well as a HELP course organized by the Council of Europe on the topic of combating trafficking in human beings for the purpose of labour exploitation.

The trainings held within the framework of this project covered almost all labour inspectors, with the exception of labour inspectors who established an employment relationship during 2025, with advanced training and introduction to examples of good practice. Owing to these trainings, labour inspectors acquired knowledge and became familiar with the indicators of trafficking in human beings for the purpose of labour exploitation, on the basis of which they can preliminarily identify victims of human

trafficking and inform the relevant authorities and services (Centre for the Protection of Victims of Human Trafficking, Ministry of Interior, Prosecutor's Office, etc.) in order to provide the necessary assistance and care for the victim, as well as adequately sanction the perpetrators of human trafficking.

Of the greatest importance for the Labour Inspectorate were activities aimed at combating human trafficking for the purpose of labour exploitation and strengthening cooperation between authorities and services dealing with human trafficking in Serbia, which strengthened the cooperation of the Labour Inspectorate with the police (criminal, border), the Centre for the Protection of Victims of Human Trafficking, the Office for the Coordination of Activities in the Fight against Human Trafficking, the Prosecutor's Office and non-governmental organizations, the Ombudsman, the market inspection.

Of great importance for labour inspectors is the Guide for Labour Inspectors on the Detection and Preliminary Identification of Victims of Human Trafficking, which was developed within the framework of this project, and which provides clear and concise guidelines for labour inspectors on how to recognize potential risks of human trafficking and how to approach determining decisive facts.

In order to improve coordination between the labour inspection, members of the Ministry of Interior and public prosecutors' offices in detecting victims of human trafficking and prosecuting those responsible, a Protocol on Cooperation in Combating Human Trafficking was signed in June 2018 between the Ministry of Labour, Employment, Veteran and Social Affairs, the Ministry of Interior and the Republic Public Prosecutor's Office.

Labour inspectors participated in trainings, workshops, conferences organized by the IOM, Ministry of Interior, Office for Coordination of Activities in Combating Trafficking in Human Beings, ESAP project, where experience and good practices, etc. were exchanged.

In accordance with the activities within the Action Plan for the Implementation of the Program for Combating Human Trafficking 2024–2026, joint and coordinated inspections of labour inspectors and police officers were carried out, primarily at construction sites, in order to potentially detect labour exploitation.

At the expert consultation of the Labour Inspectorate held in September 2024, a total of 100 labour inspectors participated in training on the topic of combating human trafficking. A representative of the Republic Institute for Social Protection held the training: Detection of Human Trafficking for the Purpose of Labour Exploitation and Identification of Victims.

In order to strengthen the capacity of labour inspectors to supervise the implementation of the Law on the Employment of Foreigners, given that foreign workers represent a more vulnerable category of employees when it comes to human trafficking for the purpose of labour exploitation, at the consultations organized by the Labour Inspectorate in 2023 and 2025 and attended by about 200 labour inspectors, training was held on the topic of the Law on the Employment of Foreigners and the Law on Foreigners - the latest amendments to the Laws, as well as on the topic of implementing

acts with special reference to the work and temporary stay in the Republic of Serbia of foreign nationals in asylum and asylum seekers.

The Labour Inspectorate paid special attention to the existence of possible indicators of human trafficking in inspections during which foreign nationals were found working.

In 2024, during 289 inspections carried out, labour inspectors found a total of 7,482 foreign nationals at work, of whom 611 did not have a work permit in the Republic of Serbia. 338 foreign nationals were found working as undeclared, without a concluded employment contract and/or without a compulsory social security application. In 2024, in the field of employment of foreigners, in the field of labour relations and in the field of occupational safety and health, the Labour Inspectorate filed a total of 140 requests for initiating misdemeanour proceedings against employers that hired foreign nationals and 1 criminal complaint against responsible persons in the field of occupational safety and health, and issued a total of 61 decisions with 135 orders to eliminate identified irregularities, 28 decisions on the prohibition of work at the workplace, 64 orders entered into 47 minutes, 13 indications and warnings and 24 notifications to the Ministry of Interior, Directorate for Aliens. During the inspections carried out, no indicators of labour exploitation were identified.

In the period January - November 2025, during 199 inspections, labour inspectors found a total of 1,886 foreign nationals at work, of whom 253 did not have a work permit in the Republic of Serbia, while 292 foreign citizens were found working informally, without a concluded employment contract and/or without submitted application for compulsory social insurance.

During the inspections, labour inspectors also determined that 1,048 foreign nationals, or 56% of the total of 1,886 foreign nationals found working, were employed by a foreign employer in a foreign country, that, in the sense of the Law on the Employment of Foreigners, posted them to work for an employer registered in the Republic of Serbia for which they perform contracted work, while 838 foreign nationals found (44%) were hired by employers registered in the Republic of Serbia.

In the period January - November 2025, the labour inspection filed a total of 104 requests for the initiation of misdemeanour proceedings against employers who hired foreign nationals, in the field of employment of foreigners, in the field of labour relations and in the field of occupational safety and health, 1 criminal complaint against responsible persons in the field of occupational safety and health and 1 criminal complaint against responsible persons in the field of labour relations, and issued a total of 48 decisions with 102 orders to eliminate identified irregularities, 21 decisions on the prohibition of work at the workplace, 58 orders entered into 46 minutes, 31 indications and warnings and 15 notifications to the Ministry of Interior, Directorate for Aliens.

In 2024 and in the period January-November 2025, during *ex officio* supervisions, labour inspectors did not find any persons in a state or circumstances that would indicate the existence of indicators of human trafficking for the purpose of labour exploitation. In these periods, in several cases, the actions of labour inspectors in this matter were initiated by submissions, and during the supervisions carried out, no indicators of human trafficking for the purpose of labour exploitation were determined.

Ministry of Interior

At the session of the Council for Combating Trafficking in Human Beings, held on December 25, 2023, a Conclusion was adopted, based on which two measures were proposed relating to the development of a new planning document in the field of combating trafficking in human beings with an accompanying action plan and the development of a law in the field of combating trafficking in human beings.

Following the Council's decision in 2024, a new planning document, the Program for Combating Trafficking in Human Beings in the Republic of Serbia for the period 2024-2029, with an accompanying Action Plan for the period 2024-2026, was adopted.

The key reform activity defined by the Program is the adoption of a special law that will regulate the field of trafficking in human beings in a systematic and comprehensive manner. The adoption of the Law on Combating Trafficking in Human Beings in the Republic of Serbia is foreseen by the Reform Agenda for the Western Balkans, i.e. the Indicative Reform Plan for the Republic of Serbia.

The aim of the law is to comprehensively regulate the area of combating trafficking in human beings. The draft law stipulates the establishment of a National Institutional Mechanism for the Prevention and Suppression of Human Trafficking and the Protection of Victims of Human Trafficking, including the entities that make up the mechanism and their competence, preventive activities in preventing human trafficking, the rights of victims of human trafficking, the procedure for identifying victims of human trafficking, as well as other issues of importance for the prevention and suppression of human trafficking and the protection of victims of human trafficking. The draft law also stipulates the duties of the National Coordinator for Combating Trafficking in Human Beings and the National Rapporteur in the Area of Human Trafficking, as well as the Council for Combating Trafficking in Human Beings.

The draft law regulates the records and processing of data related to victims of trafficking in human beings, as well as the processing of statistical data.

The draft law transposes the provisions of Directive 2011/36 of the European Parliament and of the Council on preventing and combating trafficking in human beings and protecting its victims and Directive 2024/1712 amending and supplementing Directive 2011/36, except for the part relating to criminal offences and sanctions, which is transposed when preparing amendments to the Criminal Procedure Code and the Criminal Code.

By the decision of the Minister of the Interior of August 14, 2024, a Special Working Group for the Implementation, Monitoring, Reporting and Evaluation of the Programme for Combating Trafficking in Human Beings in the Republic of Serbia for the Period 2024-2029 was established, which is composed of representatives of state bodies, organizations and civil society organizations. The President of the Working Group is the National Coordinator for the Fight against Human Trafficking and the Head of the Office for Coordination of Activities in the Fight against Human Trafficking. The participation of civil society organizations in full capacity was ensured in the aforementioned Working Group. The special working group held two meetings (October 23, 2024. and February 27, 2025).

At the last meeting (February 27, 2025), the Report on Implemented Activities for 2024 was adopted, where 95.31% of the activities planned to be implemented in 2024 from the Action Plan were implemented. All 27 activities in which the Ministry of Interior was designated as the state body responsible for the implementation of activities in 2024 were implemented. Information is being collected for the preparation of the Annual Report on the implementation of activities from the Action

Plan for 2025. It is planned that the meeting of the Special Working Group for the Implementation, Monitoring, Reporting and Evaluation of the Program for Combating Trafficking in Human Beings in the Republic of Serbia for the period 2024-2029 will be held after the report is prepared.

During 2025, the Ministry of the Interior implemented the following key activities in the field of combating human trafficking:

- A Draft Law on Preventing and Combating Human Trafficking and Protecting Victims was developed, which went through a public debate and received a positive opinion from the European Commission. The draft law is now in the Cabinet of the Minister of the Interior and should be submitted to state authorities for their opinion. After obtaining the opinion of state authorities, the law will enter the adoption procedure in the Government and the Parliament of the Republic of Serbia.
- Trainings were implemented on the topic of: digital investigations, which were attended by representatives of the police and prosecutor's office (about 20 participants); liability of legal entities, which were attended by representatives of the police and prosecutor's office (about 30 participants); financial investigations, which were attended by representatives of the police and prosecutor's office (about 30 participants); identification of potential victims of human trafficking among the migrant population, which was attended by 15 officers of the Border Police and the Asylum Office;
- A round table was held on the topic of providing free legal aid for lawyers, police representatives, civil society organizations and officials of local government units working in the field of providing free legal aid (about 25 participants);
- Activities related to the "Find Me" system are continuously being implemented;
- The Employers' Network for Preventing Human Trafficking for the Purpose of Labor Exploitation was established in order to strengthen social responsibility and ethical business in the Republic of Serbia, with the task of improving the exchange of knowledge, experiences and examples of good practice among employers, as well as encouraging the adoption of mechanisms for early recognition and prevention of labor exploitation. The purpose of the Network is to provide a platform to support employers in implementing responsible business practices and respecting international labor standards, with a particular focus on the principle of due diligence in supply chains and employment. With this approach, employers systematically assess the risks of human trafficking, take preventive measures and ensure that their business and relationships with partners comply with laws and ethical norms by creating a work environment in which respect for human rights, dignity of employees and legality of business are core values.
- The Local Anti-Trafficking Team in Prokuplje was established.
- The Annual Meeting of Local Anti-Trafficking Teams was held, attended by 60 representatives of local anti-trafficking teams, where examples of good practice were presented, as well as the activities of local teams in the previous year.
- Two trainings were implemented in Zrenjanin and Kraljevo for members of local teams for combating human trafficking, attended by around 25 participants.
- An initiative was launched to sign bilateral protocols on cooperation in the field of preventing and combating human trafficking with Slovenia, Bosnia and Herzegovina, Bulgaria and Hungary.
- A course on detecting, preventing and combating human trafficking was implemented for 15 police officers with the status of authorized officials who perform or will perform tasks of detecting, preventing and combating human trafficking.

- Please inform about the steps taken in the past year to address the recommendations of GRETA's assessment of the 3rd evaluation round report focusing on access to justice and effective remedies for victims of trafficking in human beings. Please also inform about GRETA's assessment calling for proactive and thorough investigation of allegations of trafficking for labour exploitation. Please inform about measures/steps taken to address all recommendations from this evaluation round and future plans.

Ministry of Interior

The answer has already been given in the above response.

- Please inform about the focus on women and children during the implementation of the latest strategy and about the steps taken to further reinforce Serbia's legal and institutional responses aimed at the protection of and support to victims of trafficking in human beings.

Ministry of Interior

The Program for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029 is an inter-sectorial planning document that comprehensively establishes goals and measures for combating human trafficking in the Republic of Serbia. The Program aims to promote respect for and protection of human rights and ensure a continuous comprehensive response of society to the problem of human trafficking through an improved system of prevention, timely identification, assistance and protection of all victims of human trafficking, including women and children.

The program envisages four specific objectives that will contribute to a more effective suppression of human trafficking through the improvement of the regulatory framework, investigation and prosecution of perpetrators of the crime of human trafficking, whether they are natural or legal persons, with a special focus on a proactive approach, specialization, strengthening of competencies and expanding the circle of trained subjects for recognizing the crime of human trafficking and appropriate action in all aspects of criminal prosecution, as well as access to justice and effective protection of victims of human trafficking in all phases of investigation and criminal prosecution, in order to prevent the exposure of victims of human trafficking to secondary victimization; achieving a higher level of quality of protection of victims of human trafficking through improving the efficiency of the procedure for identifying victims of human trafficking, both preliminary and formal; raising the level of awareness and knowledge to recognize human trafficking and recognize signs that a specific situation may develop into human trafficking, as well as about available protection options, as well as further developing a system that will respond to the specific requirements of preventing and combating human trafficking for the purpose of labour exploitation; continuing to strengthen partnerships and horizontal and vertical linkages in responding to human trafficking at the local, national and international levels, through ensuring intensive cooperation between state bodies, organizations and institutions with local self-government bodies, civil society organizations, the academic community, international partners and all stakeholders.

- Please inform about the implementation of the programme for the fight against human trafficking (2024-2029) and first action plan for 2024-2026. Please inform about steps taken to increase national coordination efforts against trafficking.

Ministry of Interior

The answer has already been given in the above response.

By the decision of the Minister of the Interior of August 14, 2024. a Special Working Group was established for the implementation, monitoring, reporting and evaluation of the Program for Combating Trafficking in Human Beings in the Republic of Serbia for the period 2024-2029., which is composed of representatives of state bodies, organizations and civil society organizations. The President of the Working Group is the National Coordinator for Combating Trafficking in Human Beings and the Head of the Office for Coordination of Activities in Combating Trafficking in Human Beings. The participation of civil society organizations in full capacity was ensured in the aforementioned Working Group. The Special Working Group held two meetings (October 23, 2024. and February 27, 2025).

At the meeting (February 27, 2025), the Report on the implemented activities for 2024 was adopted. According to the Action Plan for the Implementation of the Program for Combating Trafficking in Human Beings in the Republic of Serbia for the period 2024-2026, in 2024, out of the planned 64 activities, 61 activities were implemented, which is 95.31% of the implemented activities.

Regarding the implementation of the activities from the Action Plan for the Implementation of the Program for Combating Trafficking in Human Beings in the Republic of Serbia, which are planned to be implemented during 2025, the Ministry of the Interior sent letters to the state bodies responsible for the implementation of the activities, as well as to the partners in the implementation of the activities, to submit contributions in order to compile a report on the implemented activities in 2025.

After processing the material, the Ministry of the Interior will compile an Annual Report on the Implementation of Activities in 2025. It is planned that the meeting of the Special Working Group for the Implementation, Monitoring, Reporting and Evaluation of the Program for Combating Trafficking in Human Beings in the Republic of Serbia for the period 2024-2029 will be held after the report is drafted.

It is planned to form a Working Group in January 2026 to draft a new Action Plan for the period 2027-2029, with the aim of timely planning of activities and resources.

- Please inform about the adoption/plans for the implementation of the new Law on suppression and prevention of trafficking in human-beings, which is a step in Serbia's Reform Agenda.

Ministry of Interior

By decision of the Minister of the Interior in October 2024, a Working Group was established to draft a law on combating human trafficking.

The Working Group held 12 one-day working meetings and one three-day workshop. On March 31, 2025, the Working Group adopted the text of the Draft Law.

A public debate process was implemented from May 22 to June 10, 2025. The draft law was publicly available on the e-consultation portal and the website of the Ministry of Interior, after which the text of the Draft Law was harmonized with the proposals from the public debate. The report on the implementation of the public debate was published on the e-consultation portal.

In November 2025, the European Commission received a positive opinion on the Draft Law, which fulfilled the condition for the Draft Law to enter the further legislative procedure for adoption.

The Draft Law is now in the Cabinet of Ministers and should be submitted to state authorities for their opinion. After obtaining the opinion of state authorities, the Law will enter the adoption procedure in the Government and the Parliament of the Republic of Serbia.

Subsidiary regulations will be adopted within six months from the date of entry into force of the Law on Preventing and Combating Trafficking in Human Beings and Protecting Victims.

- Please inform about the steps taken to combat trafficking in human beings effectively at national and regional level by: ensuring victim identification and support, prevention activities, breaking the business model of traffickers and cooperation with countries of origin.

Ministry of Interior

The Republic of Serbia is implementing a series of systematic measures to effectively combat human trafficking at both the national and regional levels. These efforts are carried out through activities outlined in the Action Plan for the Implementation of the Program for Combating Human Trafficking in the Republic of Serbia.

Ministry of Labour, Employment, Veterans and Social Affairs

Our system for identifying victims of human trafficking, following the social path identification model, has advantages over others, because its implementation prevents assistance to victims from being directly or indirectly conditioned by their participation in criminal proceedings and provides the opportunity for persons to be identified even in cases where it is not possible to conduct an investigation, find the perpetrator, or when they do not want any cooperation with the law enforcement system. This system was praised in the OSCE publication “Putting victims first: The ‘social path’ to identification and assistance” and presented as an example of good practice at numerous international expert meetings, including the OSCE conference in Vienna in 2023, the ODIHR conference in Warsaw in 2024, and the Interpol global conference in Belgrade in 2024.

In all identification procedures, the professional procedure was carried out in accordance with defined standards, based on the use of existing professional knowledge, international and domestic regulations and existing identification indicators (indicators of the International Labour Organization, UNODC, IOM, specially created indicators within the Service, List of indicators for rapid screening of the risk of human trafficking for refugee/migrant children in mixed migrations) while respecting the principles of victim protection. Since 2021, lists of indicators for formal identification, specially created for the needs of the Centre, have also been used. All victims in the identification procedure are informed about their rights and types of support, as well as possible providers of certain services. During identification, we also consult the Guide for Writing Findings and Opinions, which was developed by a group of experts and in which the Centre's professional staff are referred not only to recommendations for writing reports, but also to the identification process itself, the method of collecting and analysing data, recognizing

specific forms of human trafficking, using a gender and culturally sensitive approach, and distinguishing certain forms of exploitation from other similar forms of abuse.

This process is comprehensive and complex and is based on an extensive identification interview, analysis of data collected from multiple sources, and professional assessment, so it is much more than simply checking indicators on a list.

With the adoption of the Regulation on the Identification and Coordination of the Protection of Victims of Human Trafficking, a 3-step urgent response system upon a report was introduced, which means that within 24 hours of receiving the report, whenever possible:

1) the victim is contacted to inform him/her about his/her rights and assess his/her urgent needs for the purpose of his/her protection,
2) all relevant institutions and services are alerted (police departments, prosecutor's offices, centres for social work, healthcare institutions, etc.)
3) a decision is made to initiate the identification procedure, thereby providing all the rights guaranteed to victims. The functioning of this system entails the existence of 24-hour on-call work of professional workers.

The result of this approach is a constant increase in the number of identified victims of human trafficking. ***71 victims of human trafficking were formally identified, which is an increase for the fourth year in a row.***

During 2024, the percentage of victims of sexual exploitation among identified persons was 32%, the percentage of victims of labour exploitation was 26%, the percentage of victims of forced begging was 19%, 14% of victims were forced to commit criminal acts, 5% were exploited through forced marriage, and we also identified victims of forced participation in war conflicts (1%) and illegal adoption (3%).

During 2024, support was provided to 537 persons, which is the largest number since the establishment of the institution. This number includes victims identified during the year (71), victims identified earlier but still in need of support (281) and persons not identified as victims but assessed as at risk (185).

The principle of organizing a multidisciplinary and cross-sectoral meeting for each victim has also been introduced, as well as the creation of a support network consisting of all relevant institutions and organizations from the state and NGO sectors. A coordination system is also defined, whereby members of this support network, together with survivors of human trafficking, will develop a protection plan. The Centre will monitor and evaluate the implementation of the plan, and will ensure regular exchange of information and resolution of problems in the implementation of activities.

The Centre for the Protection of Victims of Human Trafficking, with the support of the International Organization for Migration, has developed an **app for the preliminary identification of victims of human trafficking**. The application is intended for employees in social protection and in the Commissariat for Refugees and Migration, and the healthcare system.

Users of the app, which is available on Google Play and can be used on mobile phones, computers and similar devices, can use officially adopted indicators for preliminary

identification, which are divided into two lists – for children and adults, which are gender and culturally sensitive and cover all forms of exploitation. When they check the indicators they have noticed, they receive a notification informing them of the level of risk of human trafficking and brief instructions on how to proceed. They have the option to then send a report to the Centre's software through the app, as well as to later monitor the Centre's actions on the report and receive feedback from experts from the Centre.

All of this resulted in the fact that in 2025 we received the largest number of reports of suspicions of human trafficking since the Centre was founded – 227 reports. This is the 5th year in a row that the number of reports has increased.

8.3. Fight against firearms trafficking

- Please inform about the adoption/implementation of the new strategic document and accompanying Action Plan (2025-2030) for the control of small arms and light weapons (SALW) in line with the provisions of the revised Regional SALW Roadmap for Western Balkans.

Ministry of Interior

The new strategic document and accompanying Action Plan (2025-2030) for the control of small arms and light weapons (SALW) in line with the provisions of the revised Regional SALW Roadmap for Western Balkans was adopted by the Government on December 26, 2025.

- Please inform about the state of play as regards the revision of the arms control legislation (Law on Weapons & Ammunition, Law on Testing, Marking, Tracing & Deactivation, Law on precursors, Law on Export and Import of Dual-Use Items**)** in order to further harmonise Serbian national legislation with the EU *acquis* as well as the Criminal Code to effectively criminalise the trafficking of firearms.

Ministry of Justice

The Draft Law on Amendments and Supplements to the Criminal Code was sent to the European Commission along with Table of Compliance for an expert opinion in August 2024. In mid - November 2024, the comments of the EU experts were submitted to the Ministry of Justice. In the period from 1 October to 1 November 2024, four round tables were organized and an inclusive public debate process was held, in which judges, prosecutors, lawyers and professors participated. As a result of the interest of the general public, it was decided to organize another round of public debate. The public debate was held in the period from 10 September to 1 October 2025. The Draft Law on Amendments and Supplements to the Criminal Code was sent to the European Commission for comments on 15 October 2025. The clarification requests were sent by the European Commission on 11 November 2025 and the Ministry of Justice submitted all replies on 14th January 2026.

Article 74 of the Draft Law introduces new criminal offences into the Criminal Code, namely: Unauthorised Carrying of Disabled Firearms and Cold Weapons in Public (Article 347a), Unconscientious possession of firearms (Article 347b), and Training a minor person to use firearms (Article 347c), aimed at ensuring public safety and reducing potential danger. By prescribing the criminal offence of Unauthorised Carrying of Disabled Firearms and Cold Weapons in Public, the misdemeanour from Article 48, paragraph 1, item 4) of

the Law on Weapons and Ammunition is repealed, indicating a stricter approach from the legislator towards this type of behaviour, considering the need to protect public order and safety, as well as to prevent the possibility of disabled firearms being misused in public places, which could provoke fear or endanger public security. At the same time, by prescribing these criminal offences, complete alignment with Directive (EU) 2021/555 on control of the acquisition and possession of weapons is achieved.

Article 75 of the Draft Law, in accordance with the provisions of the Protocol against the Illicit Manufacturing of and Trafficking in Firearms, their Parts and Components and Ammunition , supplementing the United Nations Convention against Transnational Organized Crime, establishes as criminal offences the following: Illegal Possession and Carrying of Firearms, Ammunition and Explosive Substances (Article 348), Illegal Production of Firearms, Ammunition, and Explosive Substances (Article 348a) and Illegal Trade and Smuggling of Firearms, Ammunition and Explosive Substances (Article 348b).

Additionally, Article 76 of the Draft Law prescribes criminal offences such as Unauthorised Testing, Stamping or Marking of Firearms, Devices and Ammunition (Article 348c) and Counterfeiting Stamps or Markings for Testing, Stamping and Marking of Weapons, Devices and Ammunition (Article 348d), which were previously stipulated in Articles 40 and 41 of the Law on Testing, Stamping and Labelling of Weapons, Devices and Ammunition ("Official Gazette of the RS", no. 87/18), thus integrating these criminal offences into the Criminal Code. The provisions of Articles 59 and 60 of the Draft Law, in addition to the aforementioned UN protocol, are also harmonized with Directive (EU) 2021/555 on control of the acquisition and possession of weapons.

The adoption of the Law on Amendments and Supplements to the Criminal Code is planned for the 1st quarter 2026.

Ministry of Interior

During III and IV quarter 2025, an Interdepartmental working group has finalized the draft of the law. The consultative process with civil society organizations is ongoing through this working group.

Following a public debate and potential updates based on feedback, the document will be presented to the European Commission for their opinion.

Previously, in early 2025, an internal working group at the Ministry of the Interior drafted the initial text of the Draft Law on Weapons and Ammunition. In collaboration with an international expert in the field, they also prepared a table of concordance with the acquis regarding EU Directive 2021/555.

Then, an Interdepartmental working group was being established to develop a Draft law on weapons and ammunition, along with amendments to the Law on Testing, Marking, and Identification of Weapons, Devices, and Ammunition. It is essential to ensure horizontal harmonization between the provisions of these two laws and align them with the Criminal Code, considering the interconnectivity of the regulations. This is particularly important since the Republic of Serbia has recently become the thirteenth member of the International Firearms Testing Commission (C.I.P.), necessitating revisions to the relevant texts accordingly.

The drafting the Law was also affected by Government measures implemented in response to the tragic events in Elementary School Vladislav Ribnikar, from May 2023. These measures include tightening the conditions for possessing and carrying weapons and instituting a two-year moratorium on issuing permits for short firearms and hunting weapons. This moratorium has been extended until December 31, 2025, by Government Decision 05 No. 210-5660/2025, from May 29, 2025.

- Please inform about efforts to step up the fight against firearms trafficking, especially with the active participation in actions of the EMPACT Firearms Operational Action Plan, the exchange of information through SIENA and iARMS, the increase of investigations against the threat and the engagement and operational cooperation with Europol, Frontex, INTERPOL and at bilateral level with EU Member States.

Ministry of Interior

All mechanisms firearms trafficking are being continuously improved, ranging from strengthening the role of the Firearms Focal Point – FFP, to detecting and arresting organized criminal groups (OCGs), enhancing cooperation within EMPACT, as well as bilateral cooperation. The FFP is fully operational and has played a proactive role in detecting and arresting the first OCG exclusively engaged in firearms trafficking. The individuals have been prosecuted, and this case has already been judged in the first instance. Additionally, the FFP is connected to the SIENA channel for more efficient data exchange. In the previous period, notable is also the good bilateral cooperation with the Bulgarian police regarding threats arising from convertible firearms. Furthermore, a direct exchange of ballistic data within the same system – Evofinder – was carried out with the Slovenian police.

Cooperation within EMPACT firearms is increasing year by year. For the next cycle, that is, for OAP 2026-2028, the Serbian Ministry of Interior has applied and has been initially accepted to participate in 15 operational actions, which is a record so far (previously, there were 9).

In addition to the most significant OAs within the OAP FA FIX, we have also applied for activities related to explosives, K9 units etc, in order to achieve complete progress in all areas. At this moment, we are waiting for COSI to formally approve it as well. At the same time, the number of FA FIX actions represents the highest number of actions applied for within any EMPACT OAP.

During 2025, a total of 606 messages were exchanged via Europol's SIENA channel, 413 messages were received and 193 messages were sent. Regarding *iARMS*, 25 messages were received, 5 were responded to, 12 are in progress, while 8 are pending processing. Additionally, messages were exchanged with Interpol through the 24/7 channel: 28 incoming and 16 outgoing.

Since the two most significant operations were not carried out in the past year (JAD and Conversus), participation took place in the Armstrong operation, when no weapons were seized in postal traffic, but the Ministry of Interior of the Republic of Serbia included Customs and the largest postal operator, "Public Company Post of Serbia," which conducted intensive control of both domestic and international traffic.

- Could you please share statistics on firearms, ammunitions and explosives seized in 2025, as well as steps taken to ensure the destruction of surrendered/seized SALW?

Ministry of Interior

In 2025, a total of 1,010 criminal offenses were committed under Article 348 of the Criminal Code – Unlawful production, possession, carrying, and trafficking of weapons and explosive materials, in relation to 989 criminal charges were filed against 1,025 perpetrators.

In order to ensure the destruction of surrendered/seized small arms and light weapons (SALW), as one of the most important forms of control, MoI RS has two commissions: one for the surrender of weapons and one for the classification of weapons. Both commissions have been working intensively and have determined the quantities for destruction, initially 3,500 units, and now over 10,000 units. So far, these amounts have not been destroyed considering the costs of destroying individual weapons and ammunition. In this process, we are cooperating closely with SEESAK, which provides support and is trying to find a solution for the destruction of the determined quantities. All other national procedures in this regard have been completed.

- Could you please inform about measures being implemented to enhance the secure storage and oversight of arms and ammunition within police stations, particularly in light of the recent theft of 500 weapons/ammunition in early October 2025? Additionally, what steps are being taken to prioritise the destruction of weapons and ammunition to prevent such incidents and improve overall security compliance?

Ministry of Interior

In order to increase the capacity of the Ministry of Interior in the field of physical security for stock management as well as uniform treatment in all facilities or parts of facilities (warehouses) intended for acceptance, manipulation, placement and storage of weapons from the procedures, as well as the implementation of protection and control measures according to a unique methodology, at all levels, binding guidelines were given to all organizational units of the Ministry of Interior.

In this regard, among other things, all warehouses that are not secured by video surveillance, all doors that are not secured with a security code or bars are required provided with grids and the control and comparison of census lists and electronic records of the listed weapons with the weapons that are in the actual condition in the warehouse in the dynamics in accordance with the quantities that are in the warehouse were ordered. In the following period, periodic control of the warehouse will be carried out in order to determine the execution of the ordered measures.

8.4 Asset Recovery Office (ARO)

- Please inform about progress regarding the official establishment of ARO and the steps taken to make ARO fully operational. What further steps are required?

Ministry of Interior

The establishment of ARO within the Financial Investigation Unit is in its final phase. The implementation of the remaining phases involves - preparation of a decision/conclusion of the Government as a basic prerequisite for establishing the ARO system in the Republic of Serbia and sending a notification letter to the European Commission will be implemented

after the adoption of the Law on Amendments and Supplements on Law on Seizure and Confiscation of Proceeds from Crime.

- Please inform on whether an Asset Management Office has been set up alongside the Asset Recovery Office.

Ministry of Justice

The Directorate for the Management of Confiscated Assets commenced operations on 1 March 2009, based on the first Law on the Confiscation of Assets, which was adopted by the National Assembly of the Republic of Serbia in 2008 and whose implementation began on 1 March 2009. From its establishment to the present day, the Directorate for the Management of Confiscated Assets has been an authority within the Ministry of Justice.

In accordance with the Law, the Directorate:

1. manages temporarily and permanently confiscated assets derived from criminal offences, assets temporarily seized by order of a public prosecutor (Article 24), instrumentalities of criminal offences (Article 87 of the Criminal Code), pecuniary gain obtained through criminal offences (Articles 91 and 92 of the Criminal Code), assets provided as bail in criminal proceedings, and items temporarily seized in criminal proceedings, as well as assets whose disposal is restricted in accordance with decisions of the United Nations and other international organizations of which the Republic of Serbia is a member;
2. assesses the value of confiscated assets derived from criminal offences;
3. stores, safeguards, and sells temporarily confiscated assets derived from criminal offences and manages the proceeds obtained in accordance with the law;
4. keeps records of the assets it manages and of court proceedings in which decisions have been made on the confiscation of assets derived from criminal offences;
5. participates in the provision of international legal assistance and manages assets derived from criminal offences confiscated on the basis of a decision of a foreign authority;
6. participates in the training of civil servants in matters related to the confiscation of assets derived from criminal offences;
7. performs other tasks in accordance with the law.

The tasks referred to in paragraph 1 of this Article are also performed by the Directorate in relation to pecuniary gain derived from economic offences or misdemeanors, in accordance with the law.

- Considering the fact that the databases AROs must have access to, from November 2026 onwards, are listed in Article 6 of Directive 2024/1260 on asset recovery and confiscation - Directive - 2024/1260 - EN - EUR-Lex, could you please clarify which databases you have been able to connect to and which not?

Ministry of Interior

The Financial Investigation Unit, in addition to the data from the database of the basic Information System of the Serbian Ministry of Interior has direct access to the electronic

databases of the following state bodies, organizations and public services on the territory of the Republic of Serbia:

- Database of the National Bank of Serbia,
- Database of the Business Registers Agency,
- Database of the Republic Geodetic Institute,
- Database of the Tax Administration, Ministry of Finance of the Republic of Serbia,
- Database of Local Tax Administrations,
- Database of the Republic Pension and Disability Insurance Fund,
- Database of CROSO - data of registry offices from registry books (birth certificate, marriage certificate, death certificates, Serbian citizen registry books) and data on applications for mandatory social insurance,
- Database of Public utility company "Infostan Tehnologije" Belgrade,
- Database of Public utility company "Informatika" Novi Sad.

- Please inform about the work of the Ministry of the Interior's financial investigation unit being designated to carry out the functions of Serbia's ARO that are related to the exchange of police data in line with the EU *acquis*. Is ARO sufficiently staffed and with enough resources to fulfil its tasks?

Ministry of Interior

The conditions, procedures, and authorities responsible for discovering, seizing, and managing the property of individuals and legal entities obtained through criminal offenses are governed by the Law on Seizure and Confiscation of Proceeds from Crime.
The Financial Investigation Unit, a specialized department within the Service for Combating Organized Crime of the Criminal Police Directorate at the Ministry of Interior of the Republic of Serbia, is responsible for identifying property acquired from criminal activities. This unit performs various tasks according to the law and was established in 2009.

The Financial Investigation Unit performs tasks within its jurisdiction: *ex officio or upon the decision of the competent public prosecutor or court.*
The Financial Investigation Unit consists of two departments:

1. Department for Conducting Financial Investigations of Organized Crime,
2. Department for Coordination and Planning of Financial Investigations, with departments in:

- *Belgrade*
- *Novi Sad*
- *Šabac*
- *Niš*
- *Kraljevo*
- *Kragujevac*
- *Užice*

The Financial Investigation Unit as an organizational unit is part of the Service for Combating Organized Crime, Criminal Police Directorate of the Serbian Ministry of Interior.
The Financial Investigation Unit is a specialized organizational unit of the Service for Combating Organized Crime, Criminal Police Directorate of the Ministry of Interior of the Republic of Serbia. At the request of the Public Prosecutor or ex officio, the Financial Investigation Unit, in accordance with the Law on Seizure and Confiscation of Proceeds from Crime, collects the necessary evidence on the property, lawful income, lifestyle and

expenses of the defendant, the defendant's associate or the decedent, evidence on the property inherited by the legal successor, or evidence on the property and the fee for which the property was transferred to a third party.
The Rulebook on Internal Organization and Job Classification in the Ministry of Interior, from 2018 and its amendments from April 2019, it is stipulated that the work of the Asset Recovery Office is carried out by the Financial Investigation Unit.
Pursuant the mentioned Rulebook, activities related to handling requests for inspections and exchanging information with AROs of foreign countries will be carried out by all criminal investigators/police officers of the Financial Investigation Unit for reasons of efficiency and urgency in handling.
Moreover, all criminal investigators/police officers of the Financial Investigation Unit possess all legal powers to handle requests for inspections within the framework of international operational police cooperation.
Currently, the unit has sufficient human resources to respond to all challenges, but there is always room for strengthening human capacity to deal with cooperation with other AROs.

9.1 Cybercrime

- Please inform about the state of play regarding development of a new strategy and action plan for the fight against cybercrime, including the timeline for its adoption.

Ministry of Interior

The Ministry of the Interior, with the support of the Council of Europe and the OSCE Mission to Serbia, has begun the development of the Programme for combating Cybercrime in Serbia for the period 2026-2030, with the accompanying Action Plan for the period 2026-2028, and the Draft Programme.

The mentioned document was available to the interested public from 9 to 23 October. During the consultation process, there were no comments or objections relating to the content of the document. The remaining activities are related to the assessment of financial effects, final public debate, and submission to EC for opinion, after which the Program and Action plan will be officially adopted, expected in the first quarter of 2026.

- Please inform about the operational capacity of the special prosecutor's office for cybercrime.

Prosecution Office for High-tech Crime

As part of the amendments to judicial and public prosecution legislation initiated by the constitutional amendments, in 2022 the Special Prosecution Office for High-Tech Crime submitted an initiative to the Ministry of Justice to amend the Law on the Organisation and Jurisdiction of State Authorities for Combating High-Tech Crime and the related legislation, such as the Law on Public Prosecution. The aim was to establish a Special Prosecution Office for Combating High-Tech Crime as a prosecution service with special jurisdiction operating at full capacity, instead of the previous hybrid model in place since 2005, under which this prosecution office was, in organisational terms, structured in a form falling between a special prosecution office and a department of the Higher Public Prosecution in Belgrade.

The initiative was prompted by a sharp annual increase in the number of cases. According to the proposal of the Special Prosecution Office for High-Tech Crime, the required administrative capacity would consist of the Special Prosecutor for High-Tech Crime, 10 public prosecutors, 10 prosecutorial assistants, and 20 administrative staff (10 typists, 5 registry clerks, 2 administrative-technical secretaries, 2 drivers, and 1 courier).

However, although a new Law on Public Prosecution was adopted and the Law on the Organisation and Jurisdiction of State Authorities for Combating High-Tech Crime was amended, these changes did not address the initiative to establish the Special Prosecution Office for Combating High-Tech Crime as a fully-fledged prosecution service with special jurisdiction, nor the requested administrative capacity.

On the contrary, representatives of executive and legislative power launched in late 2025 initiative to further decrease legal and operational capacities of the Special Prosecution Office for High-Tech Crime by changing of the respective Law with abolishment of the prosecution office and instead of it forming only a department with these competences within the structure, organisation and management of the Higher Public Prosecution Office in Belgrade.

At present, in addition to the Special Prosecutor for High-Tech Crime, this Prosecution Office has 4 public prosecutors, 7 prosecutorial assistants, and 2 trainees of the Judicial Academy. Compared to mid-2024, when 10 public prosecutors were working in this Prosecution Office, the number of prosecutors has been significantly reduced by 60%.

Supreme Public Prosecution Office

- Following spyware attacks attempts against staff of the Belgrade Centre for Security Policy and the Center of Contemporary Policy in November 2023, as well as the findings in Amnesty International's reports regarding the subsequent use of spyware and forensic extraction tools against journalists and activists, please inform about any further developments, including whether criminal proceedings have been launched. *[Please also see agenda point 3.4 as regards personal data protection aspects]*

Prosecution Office for High-tech Crime

As previously reported, on December 24, 2024 the "SHARE" Foundation filed, on behalf of the Group of Civil Society Organizations, a criminal complaint to the Special Prosecution for Cybercrime, against unknown persons, for the criminal act of Unauthorized Collection of Personal Data under Article 146 of the Criminal Code, Creation and Introduction of Computer Viruses under Article 300 of the Criminal Code and Unauthorized Access to a Protected Computer, Computer Network and Electronic Data Processing under Article 302 of the Criminal Code, due to the existence of grounds for suspicion that unknown persons, whom the applicant suspects to be official persons, during 2024 violated protection measures, unauthorizedly accessed the mobile phones of the aggrieved parties – journalist Slaviša Milanov and activists Nikola Ristić and Ivan Bjelić, as well as an unidentified representative of the Krokodil association, and installed a malicious computer program into the aggrieved

parties' devices whose function was to collect personal and other data from the devices and automatically deliver it via the Internet to an unknown person.

In order to determine the criminal act, identify the perpetrator and collect evidence necessary for conducting criminal proceedings, the Special Prosecution for Cybercrime submitted a request for gathering necessary information on December 25, 2024 to the police officers of the RS Ministry of Interior, the Technical Directorate, and the Service for Suppression of Cybercrime. Police report is still pending.

Furthermore, based on the motion of the Special Prosecution for Cybercrime, the High Court in Belgrade issued order on February 6, 2025 to locate the place from which communication was carried out via IP addresses. Report on information upon this order is still pending.

On 30 May 2025, a supplement to the criminal complaint submitted by Program Director of the Belgrade Centre for Human Rights, was received by email, relating to the criminal complaint filed by the SHARE Foundation on 24 December 2024.

The said supplement to the criminal complaint was forwarded, together with a request for the collection of the necessary information, to the Ministry of Interior of the Republic of Serbia – Police Directorate – Directorate for Technology – Service for Combating High-Tech Crime.

On 18 November 2025, the Prosecution was provided with a report by the Ministry of Interior of the Republic of Serbia – Police Directorate – Directorate for Technology – Service for Combating High-Tech Crime.

On 3 December 2025, a new request for the collection of the necessary information was sent to the Ministry of Interior of the Republic of Serbia – Police Directorate – Directorate for Technology – Service for Combating High-Tech Crime.

- Please inform about the human resource capacities for investigations of credit card, e-commerce, and e-banking abuses and for combating illicit and harmful content on the internet.

Ministry of Interior

When it comes to human resource capacities for investigations of credit card, e-commerce, and e-banking abuses, the specialized Section for combating abuse of payment instruments and internet fraud within the Service for combating High-Tech crime has 5 positions, while the specialized Department for combating harmful and illegal content on the internet within the same Service has 12positions, of which only 6 is for investigations of online child sexual abuse.

- Please inform about the state of play with regards to judicial cooperation on electronic evidence, in particular the measures that were adopted to comply with the obligations of the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence (Budapest Convention).

Ministry of Justice

The Ministry of Justice has received initiatives from several government authorities highlighting potential issues in the implementation of obligations under the Second Additional Protocol to the Convention on Cybercrime on enhanced cooperation and disclosure of

electronic evidence (Budapest Convention). In this regard, the Ministry of Justice will prepare an analysis of the obligations envisaged by the Additional Protocol in order to determine which laws need to be amended for its implementation. This will also cover the specific responsibilities of the government authorities competent for the implementation of this Protocol and the coordination of their actions.

- Could you please update the e-platform as regards the number of investigations, indictments, final court rulings and convictions related to cybercrime for 2025?

Prosecution Office for High-tech Crime

Bearing in mind that the e-platform presents consolidated data covering various criminal offences in the field of high-tech crime, including criminal offences against the security of computer data and criminal offences against sexual freedom, be informed that, according to the data available to date, in relation to criminal offences against the security of computer data, evidentiary actions (investigations) were conducted against 6 persons during 2025. Data concerning criminal offences against sexual freedom are provided in the response to point 9.2.

E-platform will be update by 30 June 2026.

Supreme Court

Regarding court decisions, we provide data – statistics by persons, obtained from the Higher Court in Belgrade, for the period of January 1, 2025 until December, 31, 2025, as following:

- criminal cases of cybercrime (KPO3): resolved 107, convictions 86, final judgment 67, final convictions 57;

- plea agreements (SPKPO3): resolved 12, convictions 9, final judgment 10, final convictions 9;

- total: resolved 119, convictions 95, final judgment 77, final convictions 66.

Regarding the criminal offense „Showing, obtaining and possessing pornographic material and exploiting a minor for pornography“ (Article 185 of the Criminal Code), we provide the following statistics:

- criminal cases of cybercrime (KPO3): resolved 46, convictions 41, final judgment 30, final convictions 28;

- plea agreements (SPKPO3): resolved /, convictions /, final judgment /, final convictions /;

- total: resolved 46, convictions 41, final judgment 30, final convictions 28.

These are preliminary data, since Annual Report on Work of Courts has not been finalized yet. The e-platform will be entered in accordance with previously agreed schedule, by 30 June 2026.

- Please inform about international cooperation through Europol and Eurojust in order to effectively address cybercrime.

Prosecution Office for High-tech Crime

As regards international cooperation through Eurojust, one JIT with Germany is underway.

- Please inform about human resource capacities strengthening, e.g. through trainings in the area of cybercrimes, high-tech crime and cyberattacks.

Ministry of Interior

Strengthening of the Human resource capacity in the fields of cybercrime and cyberattacks has been continuously supported through a wide range of regional and international training initiatives. In particular, substantial efforts have been undertaken through projects and programs implemented by the Council of Europe and the OSCE.

These initiatives have provided specialized training, workshops, and practical exercises for law enforcement officers, prosecutors, and other relevant professionals. The training focuses on areas such as cybercrime investigation techniques, digital forensics, electronic evidence handling, international cooperation, and responses to cyberattacks. They are designed to enhance both technical expertise and legal knowledge, in line with international standards and best practices.

Judicial Academy

In 2025, Judicial Academy conducted 6 two-day workshops in Niš, Belgrade, Vrnjačka Banja and Sremska Kamenica on the topic: "Methods of managing electronic devices, electronic evidence and electronic evidence carriers" for a total of 64 participants. Moreover, Judicial Academy continuously includes this topic in other trainings related to evidence collection, forensic analysis and evaluation of evidence.

Prosecution Office for High-tech Crime

During 2025, public prosecutors and prosecutorial assistants attended various seminars and training courses in the fields of preventing violence against women on the internet and the protection of intellectual property and copyright online.

- Please inform about Serbia´s participation in the IPA-III regional programmes “EU Support to Cybersecurity Capacity Building in the Western Balkans” and “Project on enhanced action on cybercrime and electronic evidence in South-East Europe and Türkiye – CyberSEE”.

Supreme Public Prosecution Office

In 2025, the Supreme Public Prosecution Office of the Republic of Serbia participated in the Steering Committee meetings of the CyberSEE project, held on 6 June 2025 in Strasbourg and 9 December 2025 in Sarajevo and participated/ organized the participation of the representatives of the Public Prosecution Office of the Republic of Serbia in the following activities of the project:

Objective 1. Legislation and policy framework

1. **Program for combating cybercrime for period 2026-2030, with the Action Plan for 2026-2028**

- Workshops supporting drafting of the Program (15-16.05.2025 Belgrade, Serbia, 22-23.09.2025 Vrdnik, Serbia)

2. **Second Additional Protocol to the Cybercrime Convention on enhanced cooperation and disclosure of electronic evidence:**
    - Introductory national multi-agency meeting on Second Additional Protocol to the Cybercrime Convention, 27.05.2025, Belgrade, Serbia
    - International workshops:
        - Workshop for practitioners on cooperation under Second Additional Protocol to the Cybercrime Convention, 20-21.01.2025, The Hague, The Netherlands
        - Eurojust-Council of Europe workshop on Second Additional Protocol to the Cybercrime Convention, 29-30.09.2025, The Hague, The Netherlands
        - SEEDIG 10-11.11.2025, Athens, Greece
        - Regional workshop on implementation of Second Additional Protocol to the Cybercrime Convention in Western Balkans and European Union, 10-11.12.2025, Sarajevo, Bosnia and Herzegovina
3. **Council of Europe Cybercrime Convention Committee (TCY) plenary meetings:**
    - 32. Plenary, 02-03.06.2025, Strasbourg, France
    - 33. Plenary, 11-15.11.2025, Strasbourg, France

Objective 2. Capacity building on investigation, prosecution, and adjudication of cybercrime offences and the use of electronic evidence

- Regional judicial training on electronic evidence, 01-04.04.2025, Sarajevo, Bosnia and Herzegovina
- Regional Judicial Training of Trainers, with CYBERCOP, 23-25.09.2025, Tirana, Albania
- Regional Conference on Cyberviolence against Women, 23-24.10.2025, Budva, Montenegro
- Digital Forensics Conference, 04-05.11.2025, Belgrade, Serbia

Objective 3. Enhanced cooperation with cybersecurity institutions, international cooperation and cooperation with the private sector

- Workshop on cryptocurrencies, e-evidence and cooperation with service providers, with EUROJUST, 08-09.04.2025, Warsaw, Poland
- Octopus Conference, 04-06.06.2025, Strasburg, France
- High-level Cybersecurity Conference, 02-03.07.2025, Podgorica, Montenegro

In 2025, in total 143 participants from different state authorities of the Republic of Serbia participated in 31 activities organized/ supported by the CyberSEE project, which is the biggest number of participants among the project beneficiaries in the South East Europe and Turkey.

The Office for Information Technologies and eGovernment (ITE)

The Office for Information Technologies and eGovernment (ITE) contributes to relevant **IPA III regional programs** in the field of cybersecurity and cybercrime as a **partner institution and/or final beneficiary** (as it does not have an IPA unit within its organizational structure), in line with its competences in the areas of digitalization, cybersecurity and eGovernment.

IPA III programs:

The Office for IT and eGovernment participates, within its mandate, as a partner institution and/or final beneficiary in the following programs:

- Within the program **"EU Support to Cybersecurity Capacity Building in the Western Balkans"**, the Office for IT and eGovernment contributes as a partner institution and final beneficiary, primarily through cooperation with competent institutions, participation in activities aimed at capacity building, and provision of technical expertise related to state IT platforms and secure digital services.
- The Office for IT and eGovernment also contributes to the project **"CyberSEE – enhanced action on cybercrime and electronic evidence"**, through institutional cooperation with other competent authorities (the Ministry of Interior, the Public Prosecutor's Office and the judiciary), particularly in areas related to eGovernment systems, digital infrastructure and data protection, within its competences.

9.2 Child sexual abuse, including online

- Concerning showing, procuring and possession of pornographic material and minor person pornography, please inform, for the year 2025, on how many investigations/evidentiary actions were commenced against X persons, how many indictments were filed against X defendants, and how many convictions were rendered by courts against X defendants.

Prosecution Office for High-tech Crime

During 2025, Special Public Prosecution Office for High-tech Crime commenced investigations/evidentiary actions against 9 persons, indictments were filed against 28 defendants, and convictions were rendered by courts against 17 defendants.

- Please inform about the numbers of investigations commenced, indictments, final court decisions and convictions in cases related to child sexual abuse, child sexual exploitation, child pornography and solicitation of children for sexual purposes.

Prosecution Office for High-tech Crime

Please note that the presented data refer to various criminal acts against sexual freedom and also to traficking in human beings against a minor victim committed for the purpose of prostitution, sexual exploitation or in pornographic purposes.

During 2025, in cases related to child sexual abuse, child sexual exploitation, child pornography and solicitation of children for sexual purposes, public prosecutions of general jurisdiction commenced investigations/evidentiary actions against 73 persons, indictments

were filed against 62 defendants, court decisions were rendered against 78 defendant, out of which 71 defendants were convicted.

Furthermore, the Public Prosecution for Organized Crime, after conducted investigation, filed indictment against 3 defendants for criminal act Trafficking in human beings against child victims.

- Please inform about steps taken to address recommendations of the Lanzarote's committee.

Ministry of Family Welfare and Demography

In line with the agreement with the Secretariat of the Lanzarote Committee, the recommendations were officially published on 15 November 2025 and sent to the relevant institutions on 16 November 2025.

- Please inform about measures taken to ensure the prevention, identification and assistance to child victims of sexual abuse and child pornography.

Ministry of Information and Telecommunications

The National Contact Center for Children's Safety on the Internet was formed within the Smart and Safe platform by the Ministry of Information and Telecommunications in 2017 in Belgrade. Through this Center, the Ministry conducts counseling for children, parents, students and teachers, and all other citizens, about the advantages and risks of using the Internet and safe ways to use new technologies. It is also possible to receive reports of harmful, inappropriate, and illegal content and behavior on the Internet, which is, reporting a violation of the rights and interests of the child.
The National Contact Center for Children's Safety on the Internet aims to unify and link all relevant institutions in one place. In that way, the procedure for resolving submitted and forwarded cases, depending on whether illegal content or behavior violates the physical or psychological integrity of the child, violates the rights, health status, well-being, and general integrity of the child, or poses the risk of creating dependence on the use of the Internet, is simplified.
Reporting illegal or dangerous content for children may be done 24/7.
The hotline accepts anonymous reports from citizens who have accidentally discovered child sexual abuse images or any harmful online content to children. The reporting person may choose to remain anonymous or provide contact details. When contact details are provided, the sender of the report is informed about the action taken on the report.
Our Center deals with providing advice, education, and transmission of reports of internet violence to the relevant institutions.
The main goal of the operator and contact center counselor is to advise parents, guardians, and teachers to talk to children and to point them to the dangers of any kind.
Since the establishment of the National Contact Center for Online Safety on the Internet, a total of 48935 communications have been registered through telephone calls, email, the website, and social networks. The Contact Center for Child Safety on the Internet is continually educating students, parents, and teachers in primary schools throughout Serbia.
Since the establishment of the Centre, citizens have reported cases related to online sexual exploitation and abuse of children (OSEAC), including:

- 99 reports of child sexual abuse material (CSAM),
- 138 reports of sextortion,
- 104 cases of online grooming by sexual predators
- 303 cases involving sexting.

For several years, the National Contact Centre has been implementing educational workshops for children, parents, and teachers in primary and secondary schools across the Republic of Serbia, aimed at strengthening knowledge and practical competencies related to online risk awareness, prevention, and appropriate response to situations involving threats to safety and rights in the digital environment.
So far, 880 presentations have been held in 327 primary and high schools for 40316 students and 10937 parents.

Supreme Public Prosecution Office

Public prosecution are taking all measures envisaged by the law to ensure assistance to all victims of crime, especially child victims.

The CPC envisages general and special measure that could be implemeted stating that the authority conducting proceedings may *ex officio*, at the request of parties or the witness himself, designate as an especially vulnerable witness a witness who is especially vulnerable in view of his age, experience, lifestyle, gender, state of health, nature, the manner or the consequences of the criminal offence committed, or other circumstances.

An especially vulnerable witness may be examined only through the authority conducting the proceedings, which will treat the witness with particular care, endeavoring to avoid possible detrimental consequences of the criminal proceedings to the personality, physical and mental state of the witness. Examination may be conducted with the assistance of a psychologist, social worker or other professional, which will be decided by the authority conducting proceedings.

If the authority conducting proceedings decides to examine an especially vulnerable witness using technical devices for transmitting images and sound, the examination is conducted without the presence of the parties and other participants in the proceedings in the room where the witness is located.

An especially vulnerable witness may also be examined in his place of living or other premises or in an authorized institution professionally qualified for examining especially vulnerable persons. In such case the authority conducting proceedings may order application of these measures.

An especially vulnerable witness may not be confronted with the defendant, unless the defendant himself requests this and the authority conducting proceedings grants the request, taking into account the level of the witness's vulnerability and rights of defense.

If there exist circumstances which indicate that by giving testimony or answering certain questions a witness would expose himself or persons close to him to a danger to life, health, freedom or property of substantial size, the court may authorize one or more measures of special protection by issuing a ruling determining a status of protected witness.

The measures of special protection include questioning the protected witness under conditions and in a manner ensuring that his identity is not revealed to the general public, and exceptionally also to the defendant and his defense counsel.

The measures of special protection ensuring that the identity of a protected witness is not revealed to the public are excluding the public from the trial and prohibition of publication of data about the identity of the witness.

The measure of special protection whereby data about the identity of a protected witness is withheld from the defendant and his defense counsel may be ordered by the court exceptionally if after taking statements from witnesses and the public prosecutor it determines that the life, health or freedom of the witness or a person close to him is threatened to such an extent that it justifies restricting the right to defence and that the witness is credible.

In accordance with the Law on Juvenile Criminal Offenders and Criminal Protection of Juveniles, when conducting proceeding for criminal offences committed against juveniles, authority conducting proceedings shall treat the victim with care, having regard to his age, character, education and living circumstances, particularly endeavouring to avoid all possible prejudicial consequences of the proceeding on his character and development. Questioning of a child or juvenile shall be conducted with the assistance of psychologist, pedagogue or other qualified person.

If a juvenile is questioned as witness who is victim of a specified criminal acts, the questioning may be conducted at most twice, and exceptionally more if necessary to achieve the purpose of criminal proceeding. If the juvenile is questioned more than twice, the judge shall particularly have regard for the protection of personality and development of the juvenile.

If, due to the nature of the criminal offence and the juvenile's character the judge considers it necessary, he shall order questioning of the juvenile with the aid of technical devices for transmitting of image and sound, and the questioning shall be conducted without presence of the parties and other participants in the proceeding in the room where the witness is located, so that parties and persons entitled to ask question may do so through the judge, psychologist, pedagogue, social worker or other qualified person.

Juveniles may be questioned as witness/victims in their apartment or other premises and/or authorised institution – organisation that is professionally qualified for questioning of minors. The record of his/her testimony shall always be read at the main hearing or a recording of the questioning heard.

If a juvenile is questioned as witness, who due to the nature of the criminal offence, consequences or other circumstances is particularly vulnerable or is in a particularly difficult mental state, confrontation between him and the defendant is prohibited.

A juvenile who is a victim shall have a legal representative from the first questioning of the defendant. If the juvenile does not have a legal representative, he shall be appointed by the President of the Court from the ranks of attorneys with special skills in the field of the rights of the child and criminal and legal protection of juveniles. The costs of representation shall be borne by the Court budget.

If recognition of the defendant is done by a juvenile who is a victim, the Court shall proceed with particular care and shall conduct such recognition in all phases of the proceeding in a manner that completely prevents the defendant from seeing the juvenile.

Ministry of Education

Pursuant to the Law on the Foundations of the Education System[12], all forms of violence are prohibited, including sexual violence and the sexual exploitation of children, as well as digital and online sexual violence. The most recent amendments to the Law also addressed the following issues: the improvement of procedures for action in the field of protection from violence, with a specific
focus on the planning and implementation of preventive activities with students, the more effective implementation of educational and disciplinary procedures, the regulation of the use of mobile devices during educational and upbringing activities, an increase in the number of professional associates in schools, the improvement of cooperation with and accountability of parents and the strengthening of the educational role of schools.
For the purposes of prevention, early identification and protection of children, the Rulebook on the Protocol for Response in Institutions to Violence, Abuse and Neglect provides detailed procedures for reporting, defines the manner of action of employees, establishes the obligation of urgent notification of competent authorities, prescribes measures of protection and support for the child, and regulates cooperation between schools and other institutions aimed at the timely identification and provision of assistance to children who have experienced violence.
In addition to the above, since the very beginning of the operation of the National Platform "I Protect You" („Чувам те“) in 2021, the Ministry of Education has been working on the development of informational and educational content and training programmes for employees, parents and students. At present, the Platform contains 23 training programmes, and more than 450 informational and educational materials have been published and made available to the wider public in the field of the prevention of violence, discrimination and risky behaviours among children.
Some of the training programmes related to the constructive and safe use of information and communication technologies (ICT) and the prevention of sexual violence include the following:

- "Prevention of Sexual and Digital Violence" – completed by 580 students during 2025;
- "Safe Use of Digital Technology – Prevention of Digital Violence" – completed by 2,627 employees during 2025;
- "How to Protect Myself and Others on the Internet" – completed by 1,264 students during 2025;
- "Safe Use of Digital Technology and the Role of the Family" – attended by 142 parents during 2025.

Since 2023, every citizen of the Republic of Serbia has been able to report situations of violence involving children through the National Platform "I Protect You" („Чувам те“). From the beginning of the operation of the Platform in 2021 until November 2025, a total of 30,508 students have been registered on the Platform, while the number of training programmes completed by students amounts to 23,968.
With the aim of ensuring the continuous professional development of teachers and professional associates, the Catalogue of Professional Development Programmes for the school years 2025/2026, 2026/2027 and 2027/2028 (https://zuov.gov.rs/katalog-programa-strucnog-usavrsavanja-za-skolsku-2025-2026-2026-2027-i-2027-2028-godinu/) includes 112 programmes related to the field of protection from all forms of violence and discrimination.

[1] *Official Gazette of the Republic of Serbia*, No. 88/17, 27/18 – other laws, 10/19, 6/20, 129/21, 92/23, 19/25.

Additionally, with the aim of empowering parents to address the challenges present in the digital environment, the publications "Digital Literacy," "Social Networks," and "Artificial Intelligence" were published in 2025. The brochures contain explanations of key concepts and practical guidance, pointing to existing risks as well as to the potential of social networks and artificial intelligence tools, and highlighting the importance of digital literacy, https://prosveta.gov.rs/kategorija/publikacije/.

10. Law enforcement

10.1 Update on the draft law on internal affairs

- Considering the fact that in the Reform Agenda, Serbia has committed to adopt the new Law on Internal Affairs by June 2025 addressing the issue of police autonomy from the Ministry of the Interior during pre-investigation and investigation phases and recommendations from the Committee for Prevention of Torture, could you please inform about steps taken and planned steps and timeline with regards to the drafting of this law, including consultations with civil society?

Ministry of Interior

A draft law has been prepared. After consultations and public debate, the document will be submitted to the European Commission for its opinion.

The adoption of the Law on Internal Affairs is currently under the jurisdiction of the Ministry of Interior. A working group was established on May 22, 2025, to further refine the provisions of the law, building on the initial draft created by a previous working group formed in October 2024.

The current draft, which is still being coordinated with the Ministry of Interior, representatives of trade unions, and the Criminal Police University, includes several important provisions for the European Commission. These provisions focus on ensuring the operational independence of the police and implementing the standards set by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT). Additionally, it incorporates recommendations from the fifth evaluation cycle of the Group of States against Corruption of the Council of Europe (GRECO).

The working group meets once a week to finalize the draft law as quickly as possible. The aim is to submit this working version to the European Commission for review, along with an explanatory memorandum, while also initiating the consultation process and subsequent public debate.

Related to the adoption, following the commitments defined within the Reform Agenda, the deadline will be postponed to June 2026.

When it comes to the consultation with the CSOs, the Ministry of the Interior officially addressed the National Convention on the European Union which consists of civil society organizations, with a proposal to organize consultations for drafting a new Law in the second half of August. On August 14, NCEU responded by suggesting that the meeting should be postponed to September, contingent upon our willingness to elevate standards and practices related to the prohibition of torture, accountability guarantees, and the operational independence of the police to the highest level.

In its response, NCEU proposed a specific date for the meeting in September. Following this, we sent a new document to NCEU indicating our readiness to hold the meeting in

September. However, NCEU again declined, stating that it does not wish to participate in the meeting and will only engage once the law is in the public debate phase.

- Please inform about steps taken and plans to address the recommendation of the European Commission's annual reports to make the police fully autonomous from the Ministry of the Interior and fully accountable only to the Prosecutor's Office during pre-investigation and investigation phases.

Ministry of Interior

In carrying out its duties, the police have complete autonomy in relation to the Ministry.Nevertheless, the autonomy of the police has been strengthened in a new law that will regulate the field of internal affairs.
In addition to the term POLICE, the relationship between the Police, the public prosecutor, and the court is defined, as well as the organization of the Police, the competencies of the General Police Directorate, Special and special police units, Police Intervention Units, Organizational Units for Work Coordination, as well as Management and Responsibility in the General Police Directorate.

Pursuant to Article No 22 of the Law on Police, the General Police Directorate is established for performing police and other internal duties.
The General Police Directorate comprises organizational units within its headquarters– departments, centers, units, the special unit, and specialized police units, and outside itsheadquarters–the City of Belgrade Police Department, regional police departments, and police stations.
The Special Anti-Terrorist Unit shall be a special police unit.
Specialized police units within the headquarters of the General Police Directorate are the Gendarmerie, Helicopter Unit, and Unit for the Protection of Specific Persons and Facilities, whereas at the City of Belgrade Police Department, it is the Police Brigade.
For the purpose of performing policing and other duties in line with the specificities of particular areas, internal organizational units may also be established for the coordination of the work of police departments and police stations in the territories for which they are established.
Notwithstanding the act referred to in Article 9(2) of this Law, the organization and scope of work of the special unit and the specialized police units, the classification, types, i.e., status and description of jobs held by its members, the special equipment, tools, and armament used in policing within the purview of such units shall be prescribed by the Government

Pursuant to Article No. 24 of the Law on police, the General Police Directorate is responsible to:
1. develop the strategic public security assessment
2. adopt the strategic plan of the Police
3. participate in the development of the human resources plan, as well as in the development of professional training and capacity building programs in cooperation with the organizational unit in charge of human resources management
4. coordinate and guide the work of police departments and organizational units within the headquarters
5. perform oversight and instructional activity in the work of police departments and organizational units within the headquarters

6. participate directly in the performance of certain more complex tasks within the purview of police departments
7. ensure the implementation of international police cooperation agreements and other international acts within its purview
8. perform activities relating to international operational police cooperation;
9. create the required conditions for maintaining and improving the Police capabilities and preparedness for acting in situations of increased risk, emergencies, states of emergency and war;
10. carry out administrative tasks relating to citizens' status issues and issuance of public documents within its purview;
11. contribute to security-police and educational-instructional activities in police work

10.2. International and regional police cooperation, including participation in the European Multidisciplinary Platform Against Criminal Threats (EMPACT) and cooperation with CEPOL and Europol

- Please inform about developments in Serbia's participation with EMPACT framework and its Operational Action Plans.

Ministry of Interior

The Ministry of the Interior has active and successful cooperation with Europol, EU Member States and Third Parties – strategic and operational partners of Europol, as well as other partners concerning the activities envisaged by the Operational Action Plans within the EMPACT Cycle.

Engagement in EMPACT activities involves participation in expert meetings, which take place in physical and online format, planning and implementation of operational actions and coordination with partner services in the region and EU Member States, timely exchange of information via SIENA, including information on new modi operandi and new smuggling routes, trainings in all areas and strengthening capacities as an adequate response to new forms of organised crime as well as participation in joint action days. Moreover, the activities within joint investigation teams, established by Eurojust have been positively assessed.

The best indicators of the successful participation of the Serbian police in the operational actions (OAs) envisaged by EMPACT OAPs are the participation in the operational task forces (OTFs), within which high value targets (HVTs) are defined, the growing number of parallel international investigations, the results of participation in international operations and the statistics on the number of arrested persons and seizures as a result of cooperation with foreign partners within EMPACT activities.

With a view to greater operationally, the working group which was established for better coordination of the Serbian police's participation in EMPACT activities has been revised and a new decision has been adopted by virtue of which the name of the working group has been changed and its name now is the Working Group for the Harmonisation with the Instruments of Police Cooperation in the European Union through the Implementation of the EMPACT Platform and the SOCTA (abbreviated to the EMPACT Working Group), one of whose main responsibilities, apart from coordination of the participation in OAs, will be the preparation, drafting and adoption of the national SOCTA. What has been achieved through the revision of the EMPACT Working Group is that apart from the representatives of the relevant units of the Ministry of the Interior (Minister's Cabinet – the

Secretariat, Sector for Logistics and the Division for International Cooperation and Cooperation with the EU, Police Directorate, Criminal Police Department, Department for Technology, Department for Analytics, Border Police Department), its members are also the representatives of the Ministry of Finance of the Republic of Serbia, namely of the Tax Administration and the Customs Administration.

The responsible units regularly submit monthly reports on the activities carried out, so as to facilitate the monitoring of its implementation, while a reporting template has been drafted so that the reporting would be uniform and that the participants in the activities would have joint guidelines for reporting.

In the EMPACT Cycle 2024-2025, the organisational entities of the Ministry took part in the total of 76 OAs within the total of 11 OAPS, in 72 of which they were engaged as participants and in 4 of which they took part as OA co-leaders, namely in the following activities: OA 8.4 – Western Balkans within OAP High Risk OCGs, OA 2.2 Balkan Cartel within OAP CCH and OA 8.2 and OA 8.5 – Trainings for the neighbouring countries in co-leadership with CEPOL, the former being within OAP CCH and the latter being within OAP SYD/NPS.

What should be mentioned as a good example of the participation of Serbia in the previous EMPACT Cycle is the participation in OA 2.2 (Balkan Cartel) within OAP for CCH, in which eight persons who were organisers and member of the OCG which acted as a part of the Balkan Cartel were arrested in Belgrade, Niš, Novi Sad, Kikinda and Sremska Mitrovica by the end of November 2024 following several months' long joint investigation conducted with the police officers of Croatia and Bosnia and Herzegovina. Another good example is the participation in several international operations and joint action days, in which good results were achieved.

As for the forthcoming EMPACT Cycle 2026-2027, the Serbian police applied for the participation in the total of 76 OAs within all 12 OAPS sent to it for consideration. It applied for participation in 4 OAs as an OA co-leader, namely for OA 2.2 within OAP for CCH and OA 2.3, OA 4.1 and OA 6.1 within OAP for Migrant Smuggling. Alongside this, the Serbian police proposed an operational action for the first time., which it will be the OA leader of, in cooperation with Hungary and Austria, which accepted to participate in this OA as OA co-leaders. The action is question is OA 2.3 (Scam Centres in EU & Western Balkans) with OAP for Online Fraud Schemes.

Please find below the table with the number of OAs by OAP the Serbian police applied for:

OAP	OA	AL	Co-AL	P
1. MTCNI	12	0	0	12
2.1 Cyber Attacks	3	0	0	3
2.2 Online CSE	3	0	0	3
2.3 Online Fraud Schemes	3	1	0	2
3.1 CCH	8	0	1	7
3.2 SYD/NPS	4	0	0	4
4.1 Migrant Smuggling	10	0	3	7

4.2 THB	6	0	0	6
5. Firearms and Explosives	14	0	0	14
6. Environmental Crimes	3	0	0	3
7.1 VAT (incl. MTIC) fraud	1	0	0	1
7.3 IPCCGC	9	0	0	9
TOTAL	76	1	4	71

The Serbia police plans to proceed with its active participation in EMPACT activities and the use of Europol tools and products (e.g. LVG or HVG, mobile office etc.), while it will continue its intensive cooperation with the EU funded projects, which offer support to Serbia in its active participation. Furthermore, the National EMPACT Coordinator will continue to attend NEC meetings regularly.

- Please inform about the state of play of cooperation with the European Union Agency for Law Enforcement Training (CEPOL).

Ministry of Interior

In 2025, a total of 25 webinars were conducted, attracting 55 participants from the Republic of Serbia. This included 36 representatives from the Ministry of the Interior, 18 from the Public Prosecutor’s Office, and 1 representative from the Customs Administration of the Ministry of Finance.

A total of five online courses were conducted, attended by nine participants from the Republic of Serbia, including three representatives from the Ministry of the Interior and six representatives from public prosecutor's offices.

Under the "CEP" exchange program, three participants from the Ministry of the Interior of the Republic of Serbia took part in the initiative. The following activities were implemented as part of this program:

Within the General Exchange Programme, a delegation from Portugal visited the Jagodina Police Department from June 9 to June 13, 2025. The return visit by the Jagodina Police Department to Portugal occurred from July 21 to July 25, 2025.

From June 30 to July 4, 2025, representatives from the Police Directorate – Belgrade Police Department visited Portugal to discuss leadership, training, skills development, higher education and research, public order and prevention, and fundamental human rights. During the same period, another representative from the same department travelled to Italy. Both groups returned for follow-up visits from September 15 to 19, 2025.

As part of the second phase of the regional project "Western Balkans Partnership Against Crime and Terrorism (WB PACT II)", several activities were undertaken:

1. Two police officers completed a regional training cycle focused on fraud, economic, and financial crimes. They are required to conduct at least one cascade training session, which is scheduled for October/November 2025.
2. Two police officers also completed a regional training cycle on drug trafficking. They have already conducted a cascade training session at the Mitrovo Polje Training Centre

in Goč, which was attended by 46 participants from the Ministry of Interior, thus fulfilling their project-related obligations.

The regional training cycle on Counter-Terrorism: Anticipate was completed by three police officers, who are expected to deliver at least one cascade training session in 2026. Similarly, the regional training cycle on high-risk criminal networks was completed by two police officers, who are also expected to conduct a cascade training session in 2026.

Additionally, from September 21 to September 26, 2025, a mentor visit was conducted in Budapest, Hungary, as part of the Mentoring Programme focused on combating drug trafficking. This visit was attended by two police officers. Following this, from October 27 to October 31, 2025, a mentor from Hungary participated in another visit related to the same Mentoring Programme.

Furthermore, from March 25 to March 27, 2025, a scientific research conference on the topic "Confronting the World of High-Risk Criminal Networks" took place in Ostia, Italy, with one representative from the University of Criminal Investigation and Police Studies in attendance.

Lastly, from April 24 to April 25, 2025, an EMPACT Support Network workshop was held in The Hague, Kingdom of the Netherlands, attended by three police officers.

From May 21 to May 22, 2025, a meeting within the Mentorship Programme focused on drug trafficking was held in Budapest, Hungary. Two police officers attended this meeting.

On June 18 and 19, 2025, a regional conference titled “Combating Environmental Crime in the Western Balkans through Cross-Border Cooperation” took place in Ohrid, North Macedonia, with one police officer in attendance.

From July 7 to July 11, 2025, a regional course on “Financial Crime, Money Laundering, and Asset Recovery: New Tools and Technologies” was organized in Bucharest, Romania. This course had five participants from the Republic of Serbia: two representatives from the Ministry of Interior, two from the Ministry of Finance (the Customs Administration and the Administration for the Prevention of Money Laundering), and one representative from the Public Prosecutor’s Office.

Simultaneously, from July 7 to July 11, 2025, a regional course on “Online Radicalisation: Detection, Investigation, and Prosecution” was held in Vienna, Austria. Five participants from the Republic of Serbia attended this course, consisting of three representatives from the Ministry of Interior and two from the Public Prosecutor’s Office.

Lastly, on September 16 and 17, 2025, the conference “EUCrimACon2025” took place in The Hague, Kingdom of the Netherlands, with one representative from the Ministry of the Interior in attendance.

From September 18 to 19, 2025, a SOCTA workshop took place in The Hague, Kingdom of the Netherlands, attended by three representatives from the Ministry of the Interior.

Additionally, on September 10, 2025, the Western Balkans Criminal Justice Project (WBCJ) organized a training course in Alicante, Spain, focused on criminal offenses related to intellectual property, which was attended by three police officers.

From October 7 to 9, 2025, the event “Industry Days Dedicated to Combating Cross-Border Crime through Technological Solutions” was held in Zagreb, Croatia, with the participation of two police officers.

From November 17 to 21, 2025, a residential course titled "Social Networks, Public-Private Partnerships, and Influence in Counter-Terrorism Activities" was conducted in Budapest, Hungary, attended by one police officer.

Finally, on November 24 and 25, 2025, a study visit on environmental crime took place in Paris, France, with the involvement of one police officer.

From December 14 to 19, 2025, two police officers participated in a Mentoring Program focused on combating drug trafficking and visited their mentor in Budapest, Hungary.

On December 18, 2025, an online meeting took place to discuss the improved OTNA methodology, which included a representative from the Department for Cooperation with CEPOL and E-Learning.

Between October 30 and December 11, 2025, representatives from the Police Training Directorate and the National Forensic Centre collaborated on developing a Handbook on Document Checks for Basic Training through an online platform.

- Please inform about the state of play of cooperation with Europol, including on access to and use of SIENA.

Ministry of Interior

The Serbian police cooperates with Europol intensively through its International Operational Police Cooperation Division (Section for Cooperation with Europol) of the Criminal Police Department, which represent the Single Point of Contact (SPOC), thus implementing the Agreement on Operational and Strategic Cooperation signed with Europol in 2014. As a third party operational partner, the Serbian police coordinates and directly participates in carrying out criminal and operational actions organised by Europol through its National Contact Point (NCP).

The areas in which there is the most intensive cooperation are the crime areas defined as the priorities of the Serbian Police as well as the priorities of the EU in line with the EU Policy Cycle, which are at the same time the subject of the national Serious Organised Crime Threat Assessment (SOCTA), which was drafted based on the earlier methodology of Europol, while the new methodology will be applied in the drafting of the following national SOCTA.

Cooperation with Europol can be assessed as extremely significant in the fight against various forms of serious organised crime. Progress is noticeable in all crime areas, but mostly in the fight against high profile organised criminal groups responsible for Mafia-like murders, drug trafficking, migrant smuggling, trafficking in firearms and terrorism. Based on cooperation with Europol, Serbia achieves remarkable results, which can be witnessed through the number of activities, including the great number of EMPACT operational actions, it takes part in, as well as through the constant increase in the number of exchanged messages via SIENA, which would not be possible with a huge support offered by Europol.

Over the past years, it has been observed that the number of exchanged messages on an annual level is constantly growing by approximately 20%, with the exception of 2025, in which this number was somewhat smaller. The constant rise point to the implementation of Directive (EU) 2023/977, which prescribes that SIENA should be the main channel for information exchange. It has also been observed that the number of requests for cooperation initiated by the Serbian police towards Europol and foreign police services is growing

among the messages exchanged, which the result of the positive experience is dating from previous and greater confidence of foreign partners.

Moreover, cooperation which was initiated via SIENA by the Serbian police resulted in very successful joint investigations which led to the identification and arrest of and gathering important intelligence on the members of Serbian OCGs which are active in Europe and beyond, especially in trafficking in drugs and firearms and smuggling migrants, but it also led to further identification and the arrest of the members of an internationally active OCG responsible for several extremely violent murders, abductions and other serious organised criminal offences, among whom the members of law enforcement authorities were also identified through further work, which contributed to the fight against corruption and abuse of office.

Table - the number of exchanged messages via SIENA

Year	2021	2022	2023	2024	2025
Received	4924	5681	6528	9483	12332
Sent	3615	2937	3570	4189	3783
Total	7539	8618	10098	13672	12332

The Serbian police uses increasingly various types of support Europol offers to its partners, above all the Secure Information Exchange Network Application (СИЕНА), кwhich the Serbian police has had direct access to since April 2012, while it was still Europol strategic partner. It also uses Europol Platform for Experts, and its associated LFE platform, which enables the secure exchange of large files.

Apart from that, the Serbian police uses with great success many other Europol tools and products, such as indirect checks through Europol Information System, various strategic and operational reports, the most significant of which for Serbia are cross-match results and operational analysis reports. Furthermore, our police utilises the expert support offered by Europol in the form of forensic expertise, which proved to be very useful in several operations which related to forged money and documents.

Various forms of Europol support in the field are also used, such as the mobile office, which enables direct checks through Europol databases on the spot, an internet-based application for efficient and secure information exchange in real time (so called VCP or virtual command post), the Universal Forensic Extraction Device (UFED), support in dismantling illegal laboratories and print shops, coordination of joint operations and many other.

The Serbian police is associated to the total of 15 Europol Analysis Projects (12 within SOC and 3 within CT).

Active steps are taken toward the SIENA roll-out, and thus apart from NCP, eight organisational entities within Criminal Police Department have been given direct access to SIENA (the Division for Combating Organised Drug Smuggling, the Section for Operational Support, the Division for Combating General Organised Crime and the Financial Investigation Unit or the future ARO within the Service for Combating Organised

Crime, Focal Firearms Point, the Service for Combating Terrorism, which has access to CT Siena, the Service for Combating Drugs and the FAST Team), while the enabling of direct access to SIENA to police officers of the PCC at the border crossing between Serbia and North Macedonia is currently in progress.

Logistic and financial support of Europol, which enables direct cooperation and participation in numerous operational meetings, joint investigation teams and OTFs, which are crucial in cooperation aimed at combating organised crime and terrorism, is also actively used.

The Serbian police will continue to act duly upon all information received from Europol and to inform Europol regularly of all new findings it comes to as a result, all with a view even stronger joint fight against organised crime and the most serious criminal offences, i.e. disrupting violent organised groups, which pose a threat to the entire Europe and above, considering their proliferation.

Serbian police will also proceed with strategic activities at national level aimed at raising awareness and sharing knowledge of products and services Europol offers its partners among all organisational entities in charge of prevention and suppression of serious forms of crime.

10.3 Information exchange

- Please inform about the establishment of a Single Point of Contact (SPOC) to serve as the central entity responsible for coordinating and facilitating cross-border information exchange in accordance with the requirements of Directive 2023/977.

Ministry of Interior

The Serbian SPOC is structurally represented by the International Operational Police Cooperation Division of the Criminal Police Department of the Police Directorate of the Ministry of the Interior of the Republic of Serbia. The SPOC consists of the following divisions: INTERPOL NCB Belgrade, Europol NCP Serbia, 24/7 Front Desk and Data Processing Section, Section for International Cooperation in Combating Terrorism, and Section for International Cooperation in Combating Organized Crime. The latter two sections were established in the IOPCD during the restructuring of the Ministry in 2023, when the idea was to centralize the power and efforts of the police in fighting terrorism and organized crime and thus become more efficient.

In 2010, the Ministry of the Interior, the Ministry of Justice, and Ministry of Finance of the Republic of Serbia signed the Agreement on the Establishment of a Joint Body for the Improvement of International Cooperation in the Field of Crime Suppression, based on which the SPOC was established as the Agreement, which is still in force, stipulates the establishment of the International Law Enforcement Coordination Unit (ILECU) operating on a 24/7 basis.

The agreement reflects provisions of the Directive (EU) 2023/977 prescribing SPOC's organisation and composition in such a manner that it can carry out its main tasks in an efficient and effective manner, as it is inscribed that ILECU is responsible for communication and information exchange with international institutions, namely: INTERPOL, Europol, Frontex, OLAF, SIRENE bureau, SIS, SECI Centre (SELEC), as well as liaison officers and police of other states, based on the agreement on international police cooperation in the field of crime suppression, from the scope of the Ministry of the Interior. The agreement provides the legal framework for the national law enforcement

authorities to exchange information with foreign stakeholders and gives the reference to the practical and technical requirements. It stipulates that the exchange of information shall take place through secure channels established for that purpose.

Furthermore, the Instructions on the Operation of the Joint Body for the Improvement of International Cooperation in the Field of Crime Suppression were adopted by the Minister of the Interior the same year and they contain general and basic rules regulating the manner of exchange of operational information on the international level. The prescribed provision in the above-mentioned instruction is that operational information on the international level is exchanged on the basis of a written request and some mandatory elements for the information request are listed.

Moreover, the 24/7 operation of the Serbian SPOC has been duly ensured since 2014 when the Front Desk was established. The SPOC officer have access to multiple national registers and databases for information relevant to daily work.

Nevertheless, there is a need to establish a national SIRENE bureau, to correspond to the requirement embedded in Article 15 of Directive (EU) 2023/977. Before the aforementioned restructuring of the Ministry in 2023, the SPOC used to be the International Operational Police Cooperation Department of the Police Directorate and it was composed of our four divisions, one of which (the Division for Other Forms of International Police Cooperation) was projected to develop in the SIRENE bureau.

This division was abolished by the restructuring, when the SPOC was degraded from the level of an independent department of the Police Directorate to the level of the division within the Criminal Police Department, and there is currently no unit which could develop into the SIRENE bureau. Thus, new restructuring is awaited which would allow for the establishment of a unit to develop into a SIRENE Bureau and the extension of SPOC with more work posts envisaged for the future officers of the SIRENE Bureau to follow the recommendations from the Roadmap drafted under the EU funded Twinning Project “The Support in the Preparation of the Establishment of the SIRENE Bureau”.

- In terms of processing of travel information, please inform about establishing the system for receiving, protecting and exchanging passenger information (advance passenger information (API) and passenger name record (PNR)) and establishing a processing system, in accordance with the EU API/PNR framework, notably Directive 2004/82/EC, Directive (EU) 2016/681, Regulation (EU) 2025/12 and Regulation (EU) 2025/13.

Ministry of Interior

A strategic document of the Ministry of Interior for the development of ICT has been adopted, which is focused on interoperability with European Union systems in the field of internal affairs.A strategic document of the Ministry of Interior for the development of ICT has been adopted, which is focused on interoperability with European Union systems in the field of internal affairs.

The findings and guidelines from this document are used when making decisions on how to implement the ICT system reforms in such a way that the IT system of the Republic of Serbia is ready to connect the systems to the EU systems on the day of accession.

The roadmap for API/PNR is foreseen by the European Union technical assistance project, and an initial meeting with experts has been organized. The development of a status analysis is currently underway. In parallel, consultations were held with the French company IDEMIA regarding potential support for the introduction of these systems.

- Please inform about the establishment of biometric databases of suspects and convicted persons, as a pre-requisite for the Prüm automated exchanges in accordance with the Prüm II Regulation (EU) 2024/982.

Ministry of Interior

There were no significant activities related to this field.

The Serbian Ministry of Interior uses the AFIS database, which contains biometric data of suspect individuals.

The DNA profile database was established at the Ministry of Interior, the National Forensics Center, within the Department for DNA Expertise, and the National DNA Registry, following the Law on the National DNA Registry adopted in 2018. The DNA Registry contains collections of DNA profiles of suspects and convicted persons, as well as DNA profiles that fall into other categories.Moreover, in the coming period, it is planned to adopt amendments to the Law on the National DNA Registry.

Automated exchange of DNA profiles and fingerprint data in accordance with the Prum Decision has not yet been established, since not all the technical conditions have been met.met.

11. Anti-money laundering

11.1. Update on the implementation of the legislation and of Moneyval recommendations

- Could you please provide an updated number for the full year of 2025 as regards motions filed by the Serbian Business Registers Agency (SBRA) against legal entities that failed to provide information about their beneficial owner? What are the legal obstacles identified in ensuring accuracy of the data?

Serbian Business Registers Agency

Total number of motions filed by the SBRA against legal entities that failed to provide information about their beneficial owner on December 22nd, 2025 is 2,647 motions.

By adopting the new Law on Central Records of Beneficial Owners (in force from October 1st, 2025), Republic of Serbia further straitened existing legal framework which was, in the 6th round of Evaluation rated LC for Rec 24. And PC for Rec 25, regardless of the new law (which as mentioned is in force after the on site Moneyval visit and therefore could not be taken into consideration for MER adopted in Plenary, this December).

We emphasize that the MER mentioned also states that the measures implemented by the SBRA, banks, NBS and the Tax Police are cumulatively and overall effective in ensuring the availability of adequate, accurate and up-to-date basic and beneficial ownership (BO) information.

Although SBRA does note perform any risk based checks, Risk-based checks carried out by the Tax Administration and the Tax Police and National Bank risk based supervision, logically flow from high level tehnological and automated cooperation framework which very much involves SBRA.

Namely, Serbia implemented a **comprehensive system of measures** based on a **multi-pronged approach** to the collection and verification of information on the ownership and control structures of legal persons. The general architecture of our **Multi-Pronged Approach** consists of two interconnected layers which consist of many sublayers

Primary Circuit of Automated Verification

The primary circuit of automated verification implies cooperation between SBRA and many other state authorities and is underpinned by strong technological solutions. Further, in the incorporation stage, the SBRA and the Tax Administration operate as a single system through a one-stop-shop web service. Incorporation is immediately followed by the opening of a bank account. After incorporation, data bases of these stakeholders stay interconnected, and high level technology enabels stakeholders to know everything that is happening in their data bases 24/7.

This cooperation will be further improved based on the 2025-2030 Strategic-operational plan, which envisioned activities, such as:
6.3.1 Enhance the risk-based approach for identification of fictitious economic entities by the Tax Administration and integrate into supervisory programme,
6.3.2 Further develop and expand the Market Inspection's direct supervisory programme of legal entities for compliance with BO requirements, considering risk indicators for fictitious economic entities,
6.3.3 Train Tax Administration staff about BO issues to ensure identification of BO breaches as part of TA's tax audits,
6.3.4 Develop coordination arrangements between the Market Inspection and the Tax Administration about risk-based supervision of legal entities for BO compliance,
6.6.1 Train APML analysts, supervisors, SRBA and law enforcement on typologies of misuse of legal persons,
6.8.1 Conduct an analysis of the lifecycle of various types of legal entities that may be involved in ML from the moment of registration, opening of accounts, documentation related to monitoring of business and keeping of business books (Tax Administration, Tax Police, SBRA, supervisors).

Secondary Circuit of Risk-Based Controls

The secondary circuit comprises at least five complementary processes for checks and risk-based supervision.

1. The Tax Administration verifies basic and BO information at the initial stage of a legal person's existence and subsequently conducts in-depth controls based on assessed risk. The Tax Police conduct risk-based supervision of the highest-risk cases, in line with their strategic priorities.
2. The role of the NBS and banks is significant bearing in mind obligation for each and every legal person to have the bank account. This is considered a key strength of Serbia's multi-pronged approach.
3. In addition, on-site inspections by the Market Inspection and the Tax Administration further enhance the collective effort to prevent the misuse of legal persons.
4. This framework is complemented by cooperation between the APML and the Tax Police in relation to suspicious transaction reports (STRs).

5. he final element closing this circuit—effectively creating a continuous feedback loop—is the system of discrepancy reporting.

All of these elements, function as mutually reinforcing measures introduced and further developed to fully implement the multi-pronged standard.

At last, we would like to emhasize that the new Law fully transposes the requirements of Recommendation 25, ensuring a centralised and publicly accessible records of beneficial ownership information for trusts and other foreign legal arrangements with sufficient link to Serbia. It also introduces annual verification, centralised discrepancy reporting to the SBRA, and the SBRAs publicly available list of high-risk entities.

- Could you please provide an update on the progress related to tackling money laundering in sectors most at risk, including measures related to preventative control? Please clarify what steps are being taken to ensure effective supervision of DNFBPs (lawyers, accountants, casinos, real estate intermediaries, notaries) and reinforce supervisory powers in these sectors.

The Administration for Prevention of Money Laundering

As noted in the most recent mutual assessment report – MER (adopted in December 2025) Serbia has achieved a high level of AML/CFT policy coordination and demonstrates capability to devise good quality plans and strategies to target identified risks. The National Coordinating Body (NCB) and the network of coordinators effectively monitor the implementation of the national AML/CFT action plans. Over the review period (2019-2024) numerous legislative and operational reforms took place and improved Serbia's AML/CFT regime. Better alignment and prioritisation of anti-corruption measures is required (MER 2025). Competent authorities are taking measures and align their operational activities to target the ML/TF risks to which Serbia is exposed. According to the 2025 MER, further action will be required to target some of the high-threat predicates and ensuing ML, while the Chamber of Notaries and the Bar Chamber need to step up their risk-based AML/CFT supervisory efforts.

Therefore, overall, the general assessment of risk mitigation, coordination and cooperation in Serbia is that substantial level of effectiveness has been achieved and that only moderate improvements are needed.

Concerning the preventive controls, Serbia has a comprehensive legal and institutional framework in place for licensing and registration of FIs and VASPs. Fit and Proper (F&P) checks systematically cover all sectors and include verification of criminal associations. License refusals and withdrawals in the banking, leasing, insurance, and VASP sectors have been used to prevent unsuitable persons from entering the market.

Regarding DNFBPs, Serbia has established a licensing and registration regime for all sectors, with responsibilities shared among multiple authorities. At a market entry level and on an on-going basis fitness and propriety controls are applied (with more room for improvement in the Bar Association – the supervisor for lawyers).

All financial supervisory authorities articulate well their sectoral ML/TF risks (NBS in particular), especially within the banking sector, and this is consistent with the level of

materiality and risk exposure attributed to it. The Securities Commission and the APML possess a fairly well-developed and evolving understanding of ML/TF risks, aligned with the materiality and risk exposure of the sectors under their respective mandates. Resource allocation and supervisory planning are generally adequate.

For notaries and online casinos, considered also as heavily important sectors, ML/TF risk understanding by the Notary Chamber and the Games of Chance Administration (GCA) is adequate and the most developed. The Market Inspection and the APML demonstrated a reasonably good understanding of sectoral and individual ML/TF and their evolution over time. Bar Association is an area for improvement in this regard.

The authorities continue reviewing the overall adequacy of risk understanding and risk assessments within these sectors, to better align between individual risk ratings and sectoral risk ratings.

As noted in the December 2025 MER, Serbia is overall effective in ensuring the availability of basic and beneficial ownership (BO) data and rendering this accessible through various registries and other means. The controls undertaken by the various authorities are cumulatively and overall effective in ensuring the availability of adequate, accurate and up-to-date basic and BO information. Further improvements will be made reduce the overreliance on Banks' and the Tax Police' measures and to ensure that BO data is accurate and up-to-date.

The Administration for Prevention of Money Laundering (APML) plays a central role in the AML/CFT framework, with broad access to financial and other relevant information. It produces quality analytical and intelligence products that have contributed to both new and ongoing ML and predicate offence investigations (MER 2025). Action is already taken at the APML to formalise its internal processes and to improve reporting from other higher-risk sectors (as suggested by MER).

- Please inform about the effective implementation of Serbia's AML/CFT framework. This mainly refers to statistics in relation to investigations, prosecution, final convictions and confiscations.

Supreme Public Prosecution Office

Statistical data for 2025 has not yet been collected and processed.

The Public Prosecutor's Office for Organized Crime

In 2025 Public Prosecutor's Office for Organized Crime is conducting investigations against 38 suspects who perpetrated criminal offense of money laundering and raised indictments against 17 defendants.

Supreme Court

According to data of provided by Higher Courts - four special departments for suppression of corruption and Special Department for organized crime with regard to money laundering (Art. 245 of the Criminal Code) during 2025 there were 76 final convictions for money laundering. These are preliminary data, since Annual Report on Work of Courts has not been finalized yet.

- Could you please provide an update on the implementation of the 2025-2029 action plan accompanying the national anti-money laundering/countering the financing of terrorism strategic-operational plan? What were the main results of the previous strategy which expired in 2024?

The Administration for Prevention of Money Laundering

The 2025-2029 AML/CFT Strategy ("Strategic-Operational Plan") is being implemented as planned, with one important activity ahead of us i.e. the update of the AML/CFT Strategy to incorporate the 2025 MER findings and recommendations in an appropriate form therein.

Regarding the implementation of the previous strategy, please consult the attached full report which you can download here:

Report on implementatio of Ac

- Please inform about developments on Serbia´s reporting back to Moneyval on progress to strengthen its implementation of anti-money laundering and counter-terrorist financing measures.

The Administration for Prevention of Money Laundering

Serbia was the **second** MONEYVAL country (after Latvia) and the **fourth** globally to undergo a mutual evaluation in the new round (after Latvia, Malaysia, and Belgium). The on-site visit took place in May 2025, with plenary discussion taking place in Strasbourg in December 2025 at the 70th MONEYVAL Plenary.
In light of the 2025 findings, Serbia is invited to report back to MONEYVAL in three years (2028) as part of the regular follow-up (compared to 2015 when it was in enhanced follow-up and ended up on the FATF grey list).
Serbia **is generally satisfied** with the results: **7 Substantial** ratings, **4 Moderate**, with **no Low** ratings. For comparison, we should mention that Serbia in 2016 MER had **8 Moderate** and **3 Low** ratings.
The table below gives a more detailed comparative overview of the progress Serbia achieved in the AML/CFT/PF area compared to the 2016 MER findings.

The ratings testify that the AML/CFT/PF regime in Serbia, compared to the 2016 MER is like 'night and day' as several MONEYVAL delegations put it at the MONEYVAL December Plenary.
When it comes to Technical Compliance (legislation, institutions), the progress is substantial: **2015** MER concluded that Serbia was compliant (**C**) with **3** Recommendations; largely compliant (**LC**) with **20**; partially compliant (**PC**) with **16**; and non-compliant (**NC**) with **1**. Based on these results, Serbia was placed in enhanced follow-up procedures and an ICRG review.
In the 2025 MER, Serbia has **13 C, 23 LC**, and only **4 PC**, with no NC ratings.

Effectiveness[13] & Technical Compliance[14] Ratings

Effectiveness Ratings	2016 MER	2025 MER
IO.1 Risk, policy and coordination	ME	SE
IO.2 International cooperation	ME	SE
IO.3 Supervision	ME	SE
IO.4 Preventive measures	ME	ME
IO.5 Legal persons and arrangements	ME	SE
IO.6 Financial intelligence	ME	ME
IO.7 ML investigation & prosecution	LE	SE
IO.8 Confiscation	ME	SE
IO.9 FT investigation & prosecution	ME	ME
IO.10 FT preventive measures & financial sanctions	LE	ME
IO.11 PF financial sanctions	LE	SE

HE	High level of effectiveness – The Immediate Outcome is achieved to a very large extent. Minor improvements needed.
SE	Substantial level of effectiveness Immediate Outcome is achieved a large extent. Moderate improvements needed.
ME	Moderate level of effectiveness - Immediate Outcome is achieved to some extent. Major improvements needed.
LE	Low level of effectiveness – The Immediate Outcome is not achieved or achieved to a negligible extent. Fundamental improvements needed.

[13] **Effectiveness:** 11 Ratings that reflect the extent to which a country's measures are effective. The assessment is conducted on the basis of 11 immediate outcomes, which represent key goals that an effective AML/CFT/CPF system should achieve. The ratings scale :

- High level of effectiveness (HE) The Immediate Outcome is achieved to a very large extent. Minor improvements needed.
- Substantial level of effectiveness (SE) The Immediate Outcome is achieved to a large extent. Moderate improvements needed.
- Moderate level of effectiveness (ME) The Immediate Outcome is achieved to some extent. Major improvements needed.
- Low level of effectiveness (LE) The Immediate Outcome is not achieved or achieved to a negligible extent. Fundamental improvements needed.

[14] **Technical Compliance (TC)**: 40 ratings that represent the extent to which the country as established the laws, regulations and operational framework required by the FATF. These are the building blocks for a robust framework to combat money laundering, and the financing of terrorism and proliferation. The ratings scale:

- Compliant (C) There are no shortcomings.
- Largely compliant (LC) There are only minor shortcomings.
- Partially compliant (PC) There are moderate shortcomings.
- Non-compliant (NC) There are major shortcomings.
- Not applicable (NA) A requirement does not apply, due to the structural, legal or institutional features of the country

Technical Compliance Ratings

AML/CFT Policies and coordination

R.1	PC	LC
R.2	LC	LC

Money laundering and confiscation

C	Compliant	
LC	Largely compliant - There are only minor shortcomings.	
PC	Partially compliant - There are moderate shortcomings.	

Money laundering and confiscation

R.3	LC	LC
R.4	LC	PC

PC	Partially compliant – There are moderate shortcomings
NC	Non-compliant – There are major shortcomings.
N/A	Not applicable – A requirement does not apply, due to the structural, legal or institutional features of the country

Terrorist financing and financing of proliferation

R.5	LC	LC
R.6	PC	LC
R.7	NC	LC
R.8	PC	PC

Preventive measures

R.9	LC	C
R.10	PC	LC
R.11	LC	C
R.12	PC	C
R.13	PC	C
R.14	LC	C
R.15	LC	LC
R.16	PC	LC
R.17	C	C
R.18	PC	C
R.19	PC	C
R.20	C	C
R.21	C	C
R.22	PC	LC
R.23	PC	LC

Transparency and beneficial ownership of legal persons and arrangements

R.24	LC	LC
R.25	PC	PC

Powers and responsibilities of competent authorities and other institutional measures

R.26	PC	C
R.27	LC	C
R.28	PC	LC
R.29	LC	C

R.30	LC	LC
R.31	LC	PC
R.32	LC	LC
R.33	LC	LC
R.34	LC	LC
R.35	PC	LC
Cooperation with other jurisdictions		
R.36	LC	LC
R.37	LC	LC
R.38	LC	LC
R.39	LC	LC
R.40	PC	LC

- Please inform on steps taken to ensure that Serbia's legislation is closely aligned with Directive 2018/1673 of 23 October 2018 on combating money laundering by criminal law and Regulation 2023/1113. How do the amendments of the Criminal Code contribute to alignment?

Ministry of Justice

The legislative amendment process entails not only the revision of the Criminal Code but also the revision of other laws. Regarding the competence of the Ministry of Justice, the Law on Amendments and Supplements to the Law on Seizure and Confiscation of the Proceeds from Crime have been prepared. A public debate has been conducted on the aforementioned law, and it has been sent to the European Commission for an expert opinion. Following the comments submitted by the European Commission to the Draft Law on Amendments and Supplements to the Law on Seizure and Confiscation of the Proceeds from Crime on 15 October 2025, certain amendments were made to the aforementioned Draft Law. In accordance with the request of the European Commission, that version was resubmitted to the Commission on 17 December 2025, and the Commission's response is awaited so that the law may be sent into the national legislative procedure. Additionally, on January 12th, 2026, the Ministry of Justice provided the European Commission with updated table of compliance.

11.2. Suspicious transactions

- Could you please provide an update about the number of suspicious transactions reports submitted by the FIU in 2025 and follow-ups?

The Administration for Prevention of Money Laundering

In 2025, up to 29 December 2025, obliged entities reported 2.531 Suspicious Activity Reports (SARs). Below is an overview of the SARs by obliged entity:

Obliged entity	Number of SARs
Banks	1.565
Entrepreneurs and legal persons providing accounting services	7
Auditing companies and independent auditors	11
Insurance companies	16
Factoring firms	3
Broker-dealer companies	6
Postal operators	27
Real estate trade and lease agents	4
Lawyers	3
Notaries public	191
Payment institutions	352

Authorized currency exchange offices	142
Organisers of special games of chance in casinos	33
Organizers of special games of chance using electronic communication	103
Financial leasing providers	26
E-money institutions	11
VASPs	20
Voluntary pension fund management companies	0
Investment fund management companies	12
Central Securities Depository and Clearing House (CSD)	3

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-

As for follow-up, overall, *APML disseminations have proven useful to LEAs, supporting investigations and convictions […]*, as found by the 2025 MER.
A detailed overview of feedback for the 2025 SARs is to be performed in the first quarter of 2026.

12. Countering terrorism and violent extremism

12.1. Implementation of the new Joint Action Plan on Preventing and Countering terrorism and Violent Extremism for the Western Balkans

- Could you please provide an update on preparation of the national Roadmap and any plans concerning its implementation?

Ministry of Interior

The National Coordination Body for the Prevention of and Fight against Terrorism has established an inter-ministerial Working Group to draft the National Roadmap for the Republic of Serbia. This roadmap aims to implement the Joint Action Plan for preventing and countering terrorism and violent extremism in the Western Balkans for the period of 2025-2030. The Working Group commenced its activities in December 2025, with a deadline to complete the National Roadmap by the end of January 2026.

During its first meeting on December 18, 2025, the Working Group agreed on its working modalities and allocated tasks and responsibilities for the submission of inputs needed to prepare the draft National Roadmap.

Recognizing that the roadmap's development requires enhanced inter-sectoral coordination and institutional cooperation, as well as the involvement of various stakeholders to create a comprehensive societal approach in addressing radicalization and violent extremism that could lead to terrorism, the decision establishing the Working Group allows it to engage and consult representatives from other state bodies and institutions.

Consequently, a meeting was held on December 29, 2025, with representatives from bodies not officially appointed to the Working Group, to ensure their support for the group's efforts and the drafting of the National Roadmap.

It is anticipated that a working version of the National Roadmap will be prepared and submitted to the European Commission by January 13, 2026.

- Please provide an update about the timeline for the adoption of the new Counter-Terrorism –Preventing/Countering Violent Extremism (CT-P/CVE) strategic document and accompanying action plan. As the European Commission shared comments related to policy and legal alignment with the EU's approach and on tackling of threats stemming from violent extremism, could you please inform about how you intend to follow up on these comments?

Ministry of Interior

The process of aligning the documents with the comments submitted by the European Commission is currently underway. Once this alignment process is complete, which is the third round of revisions, the document will be resubmitted to the European Commission for approval. After receiving approval from the European Commission, the document will be forwarded for the procedures leading to its adoption during a Government session, as well as for formal approval.

12.2 Protection of critical infrastructure

- Please provide an update on the process of identifying critical infrastructure and on planned steps related to the legislative framework on critical infrastructure. Has progress been made on the necessary by-laws? In the comments shared on the new strategic document on CT and CVE, the European Commission highlighted the need to start working on alignment with the new legal framework on Critical Entities Resilience EU/2022/2557; could you please inform on whether there are plans in this respect, considering also the assistance provided by the EU in the framework of a IPA regional project on protection of critical infrastructure and public spaces?

Ministry of Interior

There are no notable changes or activities compared to the previously submitted contribution. Further work on the improvement and finalisation of the document will be fully based on the results, recommendations, and expert support delivered through this project, to achieve full alignment with European Union standards and policies.

13. EU Action Plan on the Western Balkans, migration management, asylum and border management

13. EU Action Plan on the Western Balkans, migration management, asylum and border management

13.1. Migration management, including readmission and return management capacities

- Please provide an update on Serbia's efforts in hosting and accommodating third country nationals and other integration measures.

Commissariat for Refugees and Migration

Accommodation third country nationals - The Commissariat for Refugees and Migrations ensures material reception conditions for asylum seekers in organized accommodation facilities, including shelter, food, clothing and cash allowances for personal needs. All centres in Serbia are open type.

The current accommodation capacities of the Republic of Serbia, managed by the Commissariat for Refugees and Migration, amount to 3,895 places in 12 asylum and reception centres (at this moment 6 are open and 6 are on stand-by mode), with duty teams available 24/7. Registration system, accommodation, food, identification, referral of vulnerable categories, free legal assistance, access to social and healthcare services and compulsory education for children are available in all centres. Currently, six reception and asylum centres are operational — Sjenica, Bujanovac, Principovac, Obrenovac, Vranje and Preševo. In addition, six asylum and reception centres—Tutin, Banja Koviljača, Pirot, Bosilegrad, Sombor and Subotica—are currently on standby. These centres can become fully operational, with a total capacity of 1,330 beds, within 72 hours if the need arises, i.e. in the event of an increased number of migrants.

Regarding accommodation standards all centres have separate sleeping spaces and common areas, dining rooms and areas for various recreational, educational and informal activities. To ensure family privacy there are centres designated for families and centres for accommodating singles. A special centre is designated for the accommodation of unaccompanied minors. The standards related to the provision of information and counselling have been significantly improved with the establishment of a system of mandatory information sessions where beneficiaries receive all necessary information about their rights and obligations. Information sessions are thematically divided and all individuals are provided with additional individual counselling. All individuals accommodated in the centres are provided with healthcare including mandatory screening upon admission. Healthcare in the centres is provided through the relevant health centres. The Commissariat for Refugees and Migration in cooperation with the Ministry responsible for education and local school authorities continuously enrols children into the regular education system in the municipalities where asylum seeker accommodation centres are located.

According to the Commissariat for Refugees and Migration (KIRS), a total of 9.757 migrants passed through the reception and asylum centers in 2025. The length of the average stay was almost the same (14 days compered to 15 in 2024) and the average number of people hosted in government centers on any one day decreased from 697 in 2024 to 349 in 2025.

Integration measures - A legal, institutional and financial framework has been established to support the integration of persons granted international protection.

The integration program of beneficiaries of international protection in the Republic of Serbia lasts one year. The program includes housing assistance, Serbian language classes, cultural orientation, legal assistance, assistance in accessing the labour market, support in education for children and facilitating access to health care.

The cost of direct benefits to users, which include twelve months of financial support for housing, 300 hours of Serbian language courses, 30 hours of cultural orientation, and a one-time financial aid, is about 8,000 EUR. Considering that the number of positive cases in the past two years a total of 14 asylum protections have been granted — 7 in 2024 and 7 in

2025, current administrative and financial capacities are sufficient. In addition, UNHCR provides complementary support both to beneficiaries through different benefits and to competent institutions through coordination and capacity building.

One of the support activities provided by the Commissariat, in cooperation with the language school "Academy Oxford," is the Program of Free Serbian Language and Script Classes. Between January 2024 and November 2025, a total of 12 individuals granted international protection attended these classes.

Another form of support is the Program for Familiarization with Serbian History, Culture, and the Constitutional System (SICU), defined by the Regulation on the Inclusion of Asylum-Granted Persons in Social, Cultural, and Economic Life. This program is implemented in cooperation with the Center for Crisis Policy and Response (CRPC), and between January 2024 and November 2025, 3 individuals participated. In addition, regarding financial integration support provided by the Commissariat, financial assistance for housing was granted, with 8 applications approved. The Commissariat also provides one-time financial aid to all persons granted protection who are currently in difficult material or health conditions. Between January 2024 and November 2025, 2 applications for this type of assistance were submitted, both approved and disbursed.

- Please provide an update on any recent developments on legal migration, including efforts to prevent exploitation of labour migrants.

Ministry of Labour, Employment, Veterans and Social Affairs

The latest amendments to the Law on the Employment of Foreigners in July 2023, which entered into full force on 1 February 2024, introduced a new, more flexible concept of employing foreigners, while protecting the domestic labour market, which allows foreigners to exercise their right to temporary residence and the right to work in a faster and easier way.

The aforementioned Law stipulates the principle of equal treatment of foreign workers, thus guaranteeing foreign nationals employed in the Republic of Serbia the same rights and obligations in terms of work, employment and self-employment as that of the nationals of the Republic of Serbia. These rights, among other things, include the right to adequate wages, occupational safety and health, healthcare, as well as the right to other forms of protection enjoyed by the nationals of the Republic of Serbia.

These legal amendments introduced a single residence and work permit, which is issued as a single document in the employment of foreigners, as well as the complete digitalization of the procedure for issuing a single residence and work permit (electronic submission of applications for residence and work, as well as for a visa) through the Portal for Foreigners.

The Labour Inspectorate controls the implementation of the Law on the Employment of Foreigners. The Labour Inspectorate paid special attention to the existence of possible indicators of human trafficking in inspections during which foreign nationals were found working.

In 2024, during 289 inspections carried out, labour inspectors found a total of 7,482 foreign nationals at work, of whom 611 did not have a work permit in the Republic of Serbia. 338 foreign nationals were found working as undeclared, without a concluded employment contract and/or without a compulsory social security application. In 2024, in the field of employment of foreigners, in the field of labour relations and in the field of occupational safety and health, the Labour Inspectorate filed a total of 140 requests for initiating misdemeanour proceedings against employers that hired foreign nationals and 1 criminal

complaint against responsible persons in the field of occupational safety and health, and issued a total of 61 decisions with 135 orders to eliminate identified irregularities, 28 decisions on the prohibition of work at the workplace, 64 orders entered into 47 minutes, 13 indications and warnings and 24 notifications to the Ministry of Interior, Directorate for Aliens. During the inspections carried out, no indicators of labour exploitation were identified.

In the period January - November 2025, during 199 inspections, labour inspectors found a total of 1,886 foreign nationals at work, of whom 253 did not have a work permit in the Republic of Serbia, while 292 foreign citizens were found working informally, without a concluded employment contract and/or without submitted application for compulsory social insurance.

During the inspections, labour inspectors also determined that 1,048 foreign nationals, or 56% of the total of 1,886 foreign nationals found working, were employed by a foreign employer in a foreign country, that, in the sense of the Law on the Employment of Foreigners, posted them to work for an employer registered in the Republic of Serbia for which they perform contracted work, while 838 foreign nationals found (44%) were hired by employers registered in the Republic of Serbia.

In the period January - November 2025, the labour inspection filed a total of 104 requests for the initiation of misdemeanour proceedings against employers who hired foreign nationals, in the field of employment of foreigners, in the field of labour relations and in the field of occupational safety and health, 1 criminal complaint against responsible persons in the field of occupational safety and health and 1 criminal complaint against responsible persons in the field of labour relations, and issued a total of 48 decisions with 102 orders to eliminate identified irregularities, 21 decisions on the prohibition of work at the workplace, 58 orders entered into 46 minutes, 31 indications and warnings and 15 notifications to the Ministry of Interior, Directorate for Aliens.

In 2024 and in the period January-November 2025, during *ex officio* supervisions, labour inspectors did not find any persons in a state or circumstances that would indicate the existence of indicators of human trafficking for the purpose of labour exploitation. In these periods, in several cases, the actions of labour inspectors in this matter were initiated by submissions, and during the supervisions carried out, no indicators of human trafficking for the purpose of labour exploitation were determined.

During the inspections, labour inspectors did not identify any cases where foreign nationals who were posted to work for an employer registered in the Republic of Serbia, for which they performed contracted work, and who were covered by inspections, had fewer rights than those prescribed by the Labour Law of the Republic of Serbia, i.e. that they did not have the same rights in the field of labour as nationals of the Republic of Serbia.

In the period January - November 2025, the labour inspection filed a total of 104 requests for the initiation of misdemeanour proceedings against employers who hired foreign nationals, in the field of employment of foreigners, in the field of labour relations and in the field of occupational safety and health, 1 criminal complaint against responsible persons in the field of occupational safety and health and 1 criminal complaint against responsible persons in the field of labour relations, and issued a total of 48 decisions with 102 orders to eliminate identified irregularities, 21 decisions on the prohibition of work at the workplace, 58 orders entered into 46 minutes, 31 indications and warnings and 15 notifications to the Ministry of Interior, Directorate for Aliens.

In the field of occupational safety and health, labour inspectors issued 33 decisions with a total of 84 measures ordering to eliminate the identified irregularities, as well as 21 decisions on the prohibition of work at the workplace. Due to the identified violations in the field of occupational safety and health, labour inspectors filed 23 requests for the

initiation of misdemeanour proceedings and 1 criminal complaint against responsible persons in the field of occupational safety and health.
In the field of labour relations, labour inspectors issued 9 decisions with 12 measures and 31 orders entered into 19 minutes to eliminate the identified irregularities, as well as 31 indications and warnings. Due to the identified violations in the field of labour relations, 40 requests for the initiation of misdemeanour proceedings against employers were also filed.
Based on the identified irregularities in the implementation of the Law on the Employment of Foreigners, labour inspectors issued 6 decisions with 6 imposed measures, 27 orders entered into 27 minutes, and submitted 41 requests for the initiation of misdemeanour proceedings.
Labour inspectors also sent 15 notifications to the Ministry of Interior - Directorate for Aliens regarding foreign nationals found working for whom the employer had not provided a work permit.
The identified irregularities in the application of the Law on the Employment of Foreigners related to the employment of foreign nationals found, including foreign nationals employed by a foreign employer in a foreign country, that, within the meaning of the Law on the Employment of Foreigners, posted them to work for an employer registered in the Republic of Serbia for which they perform contracted work, without previously obtaining a single permit for temporary residence and work in the Republic of Serbia.
Irregularities identified in the area of labour relations related to the employment of persons found without concluded employment contracts and without submitted application for compulsory social insurance, as well as to the failure to keep the employment contract or its copy at the place where the employee works, the failure to provide wage calculations to employees and the failure to pay due unpaid wages, the arrangement of working hours within the working week and the amendment of employment contracts in terms of job descriptions, wage amounts and duration, the payment of compensation for unused annual leave, as well as for transportation.

Irregularities identified in the field of occupational safety and health related to the adoption, as well as to the amendment of risk assessment acts, the organization of occupational safety and health activities, the examination of working environment conditions and the inspection and testing of work equipment by a licensed legal entity, the inspection of electrical installations, the referral of employees working in workplaces with increased risk to previous and periodic medical examinations, the training of employees for safe and healthy work and additional training of employees, the professional training of employees for work with work equipment they use at the workplace, the provision of instructions for use and maintenance of equipment, as well as instructions for safe and healthy work with work equipment, the training of an appropriate number of employees in providing first aid and the provision of first aid equipment, the determination of rights, obligations and responsibilities in the field of occupational safety and health, the adoption of employee training programs for safety and health at work, keeping prescribed records in the field of occupational safety and health, implementing prescribed preventive occupational safety and health measures at the employee's workplace (proper securing of unprotected free edges of staircases, as well as free unprotected edges of buildings under construction, implementing prescribed measures for safe and healthy work using work equipment, etc.), issuing personal protective equipment and equipment to employees for use at work in accordance with the risk assessment act, concluding a written agreement on the implementation of prescribed occupational safety and health measures with employers sharing the workplace.

In 2024 and in the period January-November 2025, within the framework of ex officio supervisions, as well as within the framework of supervision carried out upon submitted reports, which included employed foreign nationals, labour inspectors did not find any persons in a state or circumstances that would indicate the existence of indicators of human trafficking for the purpose of labour exploitation.

Ministry of Interior

At the end of 2025, the total number of foreigners residing in the Republic of Serbia is as follows:

- 111.710 foreigners with approved temporary residence on various grounds, mostly citizens of the Russian Federation, China, India, Turkey and Nepal.
- 18.559 foreigners with approved permanent residence, mostly citizens of the Russian Federation, China, Romania, North Macedonia and Ukraine.

Following the provisions of the Law on Amendments to the Law on Foreigners, as well as the Law on Amendments to the Law on the Employment of Foreigners ("Official Gazette of the Republic of Serbia" No. 62/2023), during 2025 the following bylaws was adopted:

1. Regulation on the electronic submission of visa applications and visa approval ("Official Gazette of the Republic of Serbia" No. 12/25), which regulates in more detail the method of submitting visa applications electronically (via the e-consulate service, which is available on the single portal for foreigners *welcometoserbia.gov.rs*). In addition to the above, this regulation also regulates in more detail the conditions for visa approval, as well as the appearance and content of the invitation letter.
2. Regulation on the layout of the form and detailed conditions for issuing a visa in electronic format ("Official Gazette of the Republic of Serbia" No. 31/25), which prescribes the layout of the visa form in electronic format, as well as detailed conditions for its issuance.

Following the international obligations, the Republic of Serbia has notified the International Air Transport Association (IATA) about the possibility of issuing visas in electronic form to foreign citizens who require a visa to enter Serbia, and changes to the documents required for international travel and requirements for entry into Republic of Serbia, have been entered into the TIMATIC database. (Travel Information Manual Automatic).

The electronic visa form contains a Border check - QR code, which can be scanned to check its validity at transit airport. By electronic reading displays the data from the visa form in electronic format, as well as electronic signature. A visa in electronic format contains the electronic seal of the Ministry of Foreign Affairs, which confirms the integrity of the visa data in electronic format and the identity of the visa issuer.

It also contains a two-dimensional barcode (*Validity QR code*) that contains a website where it is possible to check the validity of the digital travel permit. Verification of the validity of the data of the issued visa in electronic format and the authenticity of the electronic seal is also ensured via the appropriate web address indicated on the visa form in electronic format.

Entering the TIMATIC database, it is notified that this document, in accordance with national legislation, allows the holder to legally enter the Republic of Serbia. Also, the method of checking the authenticity of the digital document, by scanning the Border check - QR code at transit airports prevents the possibility of abuse in the use of a visa in electronic form for entry into the Republic of Serbia, as well as traveling through transit airports.

The layout of the form of visa in electronic format, name and security features are aligned with the international standard i.e – technical Manuel for Machine Readable Travel Documents of the International Civil Aviation Organization (ICAO) and *Machine*

Readable Travel Documents Technical Report – Digital Travel Authorization Authorization.

When a foreigner entering to Republic of Serbia at the border crossing point a checks of fulfillment of the general conditions for the entry are made, including a check of the validity of the visa in electronic form. On this occasion, the travel document with which is used for crosses the state border of the Republic of Serbia is read. The data entered to the travel document (including number of travel document) are entered on the visa in electronic form issued to the foreigner. While checking a travel document at border crossing point, the validity of the issued visa is automatically checked as well. The checks are made through the information system of the MOI, in the database of submitted, approved and rejected visas for entry into the Republic of Serbia. In this way, by matching the data from the electronic visa in information system of MOI, validity of issued visa has been checked automatically.

Issuing visas in electronic format is in initial phase and currently being issued exclusively to persons who have applied for a short -stay visa (C visa).

An electronic visa is issued exclusively in cases where a low risk of illegal migration has been determined, and only to citizens of countries for which a previous analysis has determined that their citizens did not abuse visas and that they entered and exited the Republic of Serbia legally, within the period of validity of the visa.

The effects of issuing visas in electronic form are continuously assessed. If it is determined that there has been misuse of issued visas, the possibility of suspending the issuance of visas in electronic format for citizens of those countries is envisaged.

From mid-April, when issuing visa in electronic form has been provieded, until the end of 2025, a total of 460 visas in electronic format were issued by the diplomatic and consular missions of Republic of Serbia.

Both the amendments to the Law on Foreigners and the Law on the Employment of Foreigners, which were implemented during 2023, were largely aimed at implementing the institute of a single residence and work permit for foreigners, in accordance with European legislation in this area.

The application for a single permit (residence and work) is processed in a single procedure, and the prescribed authorities responsible for carrying out checks (the Ministry of Interior and the National Employment Service), each within its own authoryty, check whether the legal requirements for granting a single permit have been met. The procedure for issuing a D visa based on employment (witch is a residence and work permit in the Republic of Serbia for 180 days from the date of issuance), is identical.

During the checks carried out by the National Employment Service in 2025, it was noticed that in a certain number of visa applications, falsified documentation was submitted, namely: falsified a Report on the conducted labor market test (document issuing by National Employment Service); falsified documents drawn up by the employer (employment contract, systematization act, invitation letter...), as well as falsified other documents (most often a diploma of the achieved level of education).

When acting on requests, National Employment Service by the place of arrival of the foreigner, after determining that any of the submitted documents is forged, submit to the Ministry of Interior an assessment that the applicant does not meet the conditions for issuing a D visa based on employment, with the explanation that forged documentation was submitted with the request.

Due to the submission of falsified documentation, the National Employment Service filed 8 criminal charges with the competent prosecutor's office during 2025. The above represents an activity that is carried out continuously.

Additionally, even if a visa is issued, at the border crossing upon entry into Serbia, police officers conduct additional checks, and if it is determined that foreinger does not meet the conditions for entering the country, even though he has been issued a visa, police refuse him/her entry into the country, in accordance with the law.
During 2025, there were 156 foreign citizens who held C or D visas, for whom after additional chechs, determined that there is a risk of illegal migration after entering into Srbia. Due to this for them was refused entering into Srbia at air border crossings, no matter issued visa.
In details, for 78 foreign citizens who held a D visa (Bangladesh - 61, Nepal - 5, Kenya - 4, Egypt - 3, India and Ghana - 2 each, as well as 1 citizen of Pakistan) were refused entering into Serbia. Most often, D visas were issued at the Embassy of the Republic of Serbia in New Delhi (68).
For 78 foreign citizens who held a C visa (Iraq - 38, Guinea - 7, Congo and Cameroon - 5 each, DR Congo, Nigeria and Egypt - 4 each, Bangladesh - 3, Pakistan, Senegal and Togo - 2 each and Algeria and Gambia 1 each) were refused entering into Serbia. Most often, C visas were issued at the Embassy of the Republic of Serbia in Baghdad (37).
This activitys prevent secondary migration to EU countriest, and also posiible exploitation of foreign workers, at the same time.
On March 24, 2024, the Government of the Republic of Serbia adopted the Program for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029, with the accompanying Action Plan for the period 2024-2026.
The Program, through four Specific Objectives, elaborates on the measures that need to be taken in order to improve the efficiency of state bodies in combating human trafficking. The first specific objective includes measures to improve investigations and prosecution, and the third specific objective includes measures to prevent and detect various forms of exploitation, with an emphasis on labor exploitation.
Different state bodies were identified as stakeholders, with an emphasis on the role of the Ministry of Interior, the Ministry of Justice, and the Ministry of Labor, Employment, Veterans and Social Affairs.
Investigations and prosecutions involve specialization and training of police and prosecutors in dealing with cases of human trafficking, as well as training of inspectors from the Labor Inspectorate to detect victims of human trafficking for the purpose of labor exploitation.
In this regard, during 2025, the police, in cooperation with the competent prosecutor's offices, filed 19 criminal charges for the criminal offense of Human Trafficking under Article 388 of the Criminal Code (23 criminal charges were filed in 2024). Of the above number, two were filed due to suspicion of labor exploitation of foreign workers - one Indian citizen and one Uzbek citizen.
The Labor Inspectorate controls the implementation of the Law on the Employment of Foreigners.
In 2024, the Labor Inspectorate carried out 289 inspections, during which a total of 7.482 foreign workers were found at work. In 2025, it carried out 199 inspections, during which a total of 1.886 foreign citizens were found at work.
When conducting inspections in which foreign citizens were found to be engaged in work, special attention was paid to the existence of possible indicators of human trafficking and labor exploitation.
During 2024/2025, the Labor Inspectorate did not record any cases that would possibly indicate human trafficking for the purpose of labor exploitation.

- Please inform about steps taken to ensure that legal pathways developed for third country nationals entering Serbia prevent secondary movements to the EU.

Ministry of Interior

The Serbian Ministry of the Interior has recognized the need to take more specific measures to prevent and stop spill overs from regular into irregular migration.

At the end of 2025, a new Strategic Assessment of Public Security for the period 2026-2029 was adopted. In this strategic document activities in the aim to prevent and suppress irregular migration were defined as one of the priorities. All activities are specifically defined and given as a task to all organizational units of Police Directorate of MOI, due to prevent and suppress the spill overs of regular to irregular migration.

Also, one of the measures that is being taken continuously is a detailed check of the validity of submitted visa applications for Serbia. In this regard, of the total number of visa applications processed in 2025 (113.861), about 60% (66.836) were rejected. For comparison, in 2024, this percentage was about 44% (of 48.010 processed - 21.160 visa applications rejected).

One more step in efforts to prevent secondary movements towards the EU is detailed border checks that have been intensified upon entry into the Republic of Serbia of foreigners coming from high-risk migration countries. In this regard, during 2025, a total of 156 foreign citizens who had previously been issued a visa were denied entry (explained in details in question 2 of this document).

A significant novelty is prescribed by the provisions of the Law on Amendments to the Law on Foreigners. That novelty is prescribing an obligation of the inviter, after foreigner comes to Serbia on his invitation.

Beside obligation of inviter to bear the costs of forced removal if it occurs, the inviter additionally undertakes obligations regarding migrant workers, such: obligation to register the worker's place of residence, register for mandatory social insurance, as well as the obligation to obtain a travel ticket to return to the country of origin after the end of the work engagement. In case of failure to comply with this obligation, misdemeanour liability is prescribed.

Prescribing the obligations that the inviter of a foreigner must undertake upon entering Serbia, indirectly prevents the possible exploitation of foreign workers and protects the rights of migrants. This also contributes to safer and more secure movements of migrant workers, with an emphasis on respecting their human and employment rights. This legally prescribed measure, also indirectly contributes to reducing secondary migration.

In order to prevent secondary migration, measures are being taken against citizens who do not require a visa to enter in Serbia. Among this category, the most numerous are Turkish citizens. Since the beginning of the year - 1.438 Turkish citizens have been refused entry at border crossings points of the Republic of Serbia (during 2024 – 2.355 Turkish citizens were refused entry).

The measure of returning foreigners who no longer meet the conditions for residence in the Republic of Serbia has also been intensified.

Since the beginning of 2025, a total of 336 foreign citizens have been escorted from Detention centres (operating by MIO) to the border crossing point in the Republic of Serbia in the aim of returning to their country of origin, i.e. previous entry. Compared to the same

period in 2024, the number of persons escorted to the border crossing point in the return procedure represents an increase of 84%.

Commissariat for Refugees and Migration

Taking into account the competences of Commissariat for Refugees and Migration (KIRS) we provide regular information sessions for migrants in asylum/reception centers on available options which include asking for international protection in Serbia or entering the program of AVRR.

- Could you please inform about how Serbia investigates criminal labour agencies and enterprises which abuse the visa system by charging excessive fees for foreign workers coming to Serbia for the issuance of letters of confirmation?

Ministry of Labour, Employment, Veterans and Social Affairs

The Law on Employment and Unemployment Insurance (Official Gazette of the Republic of Serbia, No. 36/09, 88/10, 38/15, 113/17 - other law, 113/17 and 49/21) prescribes the conditions for the establishment and operation of employment agencies. In the legal system of the Republic of Serbia, the responsible parties for employment are the National Employment Service and employment agencies. Employment agencies, as private providers of employment services in the Republic of Serbia, are subject to a licensing system (obtaining a work permit), issued by the Ministry of Labour, Employment, Veteran and Social Affairs in a complex procedure in which the spatial and technical conditions and professional qualifications of employees are checked, as well as other conditions, in direct cooperation with inspection services and other competent authorities, depending on the specific case.
The aforementioned Law prescribes penal provisions for providers of employment services if they perform them contrary to the provisions of this Law.

In accordance with the Law on Employment and Unemployment Insurance, the Ministry of Labour, Employment, Veteran and Social Affairs issues work permits to employment agencies. After obtaining a permit, the agency is entered in the register of the competent authority, after which it can begin its work. The list of registered employment agencies is published on the Ministry's website.
A List of business entities that carried out employment activities without a permit and a List of revoked work permits for employment agencies (criteria, etc.) are also available on the Ministry's website, which is in accordance with the provision of the Law on Employment of Foreigners, which stipulates that an agency cannot be established nor employment activities can be carried out by a person who is the founder of an agency whose permit to carry out employment activities has been revoked (within three years from the date of revocation of the permit), nor by the founder of an agency that has been determined by an act of the competent inspection body to carry out employment activities as an unregistered economic entity (within three years from the date of adoption of that act).
Also, based on the request of the Ministry of Labour, Employment, Veteran and Social Affairs, the Ministry of Internal and Foreign Trade, the Market Inspection Sector, supervises economic entities, including employment agencies, as well as individuals who engage in employment services without a work permit.

In 2025, this Ministry did not issue any decisions to revoke the work permit of a temporary employment agency pursuant to Article 7, paragraph 2, in connection with paragraph 1, item 3) of the Law on Agency Employment, due to the violation of the rights of assigned employees, or continuous violation of the provisions of this Law, because there was no proposals from the labour inspection to act pursuant to the aforementioned provisions of the Law on Agency Employment.

In 2024, the Labour Inspectorate carried out 16 inspections of temporary employment agencies over the implementation of the Law on Agency Employment, of which 15 inspections were to determine whether the spatial and technical conditions for the operation of a temporary employment agency were met based on submitted requests, as well as 1 control inspection. The inspections covered 11 employees.

The inspections carried out based on 15 submitted requests determined that the prescribed conditions were met and 15 decisions were issued that the prescribed conditions for the operation of a temporary employment agency were met.

The performed control supervision determined that the employer did not act in accordance with Article 35, paragraph 1 of the Law on Agency Employment, because the employer sent the employees to work for another employer, and therefore the labour inspector filed 1 request for initiating misdemeanour proceedings against the legal entity and the responsible person in the legal entity.

Also, in 2024, the labour inspection conducted 1 supervision over the implementation of the aforementioned Law at the user employers for which, under their supervision and management, assigned employees in an employment relationship with a temporary employment agency temporarily performed work in accordance with the Law on Agency Employment. The supervision was carried out upon an employee's submitted representation. The performed inspection supervision covered 1 assigned employee.

During the inspection carried out at the user's employer upon submission of the complaint, labour inspectors did not identify any irregularities.

In the period January-November 2025, the Labour Inspectorate carried out 17 inspections of the implementation of the Law on Agency Employment in temporary employment agencies, of which 14 inspections were to determine the fulfilment of the spatial and technical conditions for the operation of a temporary employment agency based on submitted requests, as well as 3 based on submitted reports. The inspections covered 24 employees.

The inspections carried out based on 14 submitted requests determined that the prescribed conditions were met and 13 decisions were made on the fulfilment of the prescribed conditions for the operation of a temporary employment agency. In addition, 1 decision was made to eliminate the identified irregularities, and 1 request was submitted to initiate a misdemeanour procedure.

In the period January-November 2025, the Labour Inspectorate carried out 7 inspections of the implementation of the aforementioned Law at user employers where, under their supervision and management, assigned employees in an employment relationship with a temporary employment agency temporarily performed work in accordance with the Law on Agency Employment. One inspection was carried out *ex officio*, while 6 inspections were carried out upon a submitted report. The performed inspection included 39 assigned employees.

During the inspections carried out in the period January-November 2025 at the user employers, labour inspectors did not identify any irregularities.

Ministry of Interior

In 2025, there were no recorded cases of prosecution of agencies or employers in Serbia for overcharging for invitation letters. Individual cases of falsified invitation letters were recorded, with the perpetrators being unknown individuals who misused the data of active or inactive business entities.

Several cases have been recorded where invitation letters were forged, or false. It was determined that the invitation letters were not sent by the employers whose business name was stated in the invitation letter, but by unknown persons who randomly misused the business name of certain business entities. These actions were carried out without the participation of the employees of concrete business entity. In this way, unknown persons tried to deceive foreign workers into paying them money in order to supposedly confirm that foreign workers were been invited to work.

In those cases we have situation that invitation letter is false (confirmed during a checks with the alleged inviter), workers did not come to Serbia, although they paid unknown persons invitation letter. In this situation makes investigations in this issued very difficult, bearing in mind that is hard to determinate jurisdiction for prosecution (the foreign worker - the injured party remains in his country, and the individual - the suspect who committed the criminal act remains in Serbia), and beside that suspect is unknown.

Such cases rarely reach our diplomatic and consular missions abroad, because the entire plot is fictitious, and the reporting of a criminal act often depends solely on the report of the injured party in the country of origin. It follows that the initiative for a joint investigation should actually come from the migrant's country of origin, where the injured migrant worker should file a report that he/she has been defrauded or otherwise injured.

The last case in which individuals were prosecuted for forged invitation letters in the Republic of Serbia dates back to 2023, when, as part of an international operational action initiated by Spain, in which MOI of the Republic of Serbia participated. Several suspects were deprived of liberty on the territory of several countries, including the Republic of Serbia, for smuggling Cuban citizens who came to Serbia, as a transit country, by using forged invitation letters (operation called Gran Salto).

The system of licensing and supervision of employment agencies in Republic of Serbia is regulated by the Law on Employment and Unemployment Insurance and the Law on Agency Employment. In the legal system of the Republic of Serbia, the bearers of employment affairs are the National Employment Service and employment agencies.

Employment agencies, as private providers of employment services in the Republic of Serbia, are subject to a licensing system (obtaining a work permit for working), which is issued by the Ministry of Labour, Employment, Veterans and Social Affairs in a complex procedure that involves checking spatial and technical conditions and the professional qualifications of employees, as well as checking other conditions, which is carried out in direct cooperation with inspection and other competent authorities, depending on the specific case.

Law prescribes penal provisions for those responsible for employment if they perform their duties contrary to the provisions of Law on Employment and Unemployment Insurance.

In accordance with the Law on Employment and Unemployment Insurance, the Ministry of Labour, Employment, Veterans and Social Affairs issues operating permits to employment agencies.

After obtaining the permit, the agency is entered into the public register of Ministry available on website, after which it can begin operating.

The List of Registered Employment Agencies, the List of business entities that performed employment activities without a license, and the List of employment agencies with revoked work permits are published and regularly updated on the website of the Ministry of Labour, Employment, Veterans and Social Affairs.

The Law on Agency Employment ("Official Gazette of the Republic of Serbia" No. 86/2019), among other things, regulates operating conditions agencies for temporary employment, the manner and conditions of employee referrals, the relationship between the agency who referral worker and the user employer, as well as the obligations of the agency who referral worker and the user employer towards worker.

The law stipulates that the Ministry of Labour, Employment, Veterans and Social Affairs, issues a work permit to agencies for temporary employment, while supervision of the procedure for determining whether agencies for temporary employment meet the requirements for work is carried out by the labour inspectorate.

In 2025, the Labour Inspectorate carried out 14 inspections of the implementation of the Law on Agency Employment, in agencies for temporary employment (there were 16 in 2024). In 2025, the Labour Inspectorate did not determine any grounds for revoking the work permits to agencies for temporary employment.

Also, labour inspection is during 2025 carried out 7 control inspections, one ex officio and 6 upon application by the employee who were referral by agency for temporary employment. The inspection covered 39 referral employees and no irregularities were found on that occasion.

Bearing in mind all mention, joint activities of competent state bodies and available information, MOI in order its competences actively cooperates with diplomatic and consular missions and other authorities in exchanging information on observed abuses and one of the measures is a high percentage of rejected visa applications in 2025, as we noticed previously.

- Could you please update the following paragraph for the entire year 2025? “According to the Commissariat for Refugees and Migration (KIRS), a total of 19.483 migrants passed through the reception and asylum centres in 2024 which represents a sharp decrease in comparison with 2023 (108.828). The length of the average stay almost the same -15 days (16 in 2023) and the average number of people hosted in government centres on any one day decreased from 2.886 in 2023 to 697 in 2024.”

<u>Commissariat for Refugees and Migration</u>

“According to the Commissariat for Refugees and Migration (KIRS), a total of 9.757 migrants passed through the reception and asylum centers in 2025 which represents a sharp decrease (51,77%) in comparison with 2024 (19.453). The length of the average stay almost the same -14 days (15 in 2024) and the average number of people hosted in government centers on any one day decreased from 697 in 2024 to 349 in 2024”

- Please inform about the review of the national response plan/ contingency plan to cope with flows scenarios, including through enhanced coordination with different authorities.

Commissariat for Refugees and Migration

For the purpose of preventive planning and providing an appropriate response in the areas of reception and registration, in April 2025 the Response Plan for an Increased Number of Migrants in 2025 was adopted. All relevant authorities involved in migration management participate in the preparation of the Response Plan, while the Plan and its amendments are prepared by the Commissariat for Refugees and Migration. The Plan provides for coordinated support to migrants and asylum seekers, including accommodation, healthcare, education, and other services, as well as the protection of local communities and the state border. The Plan is aligned with the standards of the EU Agency for Asylum (EUAA). Indicators are regularly updated in cooperation with the EUAA, and there are plans to also include indicators used by Frontex.

- Could you please provide updated numbers on Ukrainian and Russian citizens residing in Serbia and under which status?

Ministry of Interior

Ukraine - At the end of 2025 on the territory of the Republic of Serbia there are 660 citizens of Ukraine with approved permanent residence, and 1.086 citizens of Ukraine with approved temporary residence, on various grounds.

In 2025, a decision was made for 356 citizens of Ukraine granting temporary protection, while a decision was made for 817 citizens of Ukraine extending temporary protection.

Russia - At the end of 2025 on the territory of the Republic of Serbia 6.033 citizens of Russian Federation with approved permanent residence, and 54.817 citizens of Russian Federation reside in Serbia with approved temporary residence, on various grounds.

- Could you please inform about how many Russian citizens have received Serbian citizenship since 2022? How many under accelerated procedure (Art 19 of the Citizenship Law) and how many under ordinary procedure? Of those, how many in 2025, also in each of the two procedures? How many applications are pending under each procedure? Could you please provide further information on the grounds under which they were granted citizenship and what security screening measures were in place?

Ministry of Interior

In 2025[15] a total of 1.082 persons who previously held citizenship of Russian Federation were granted citizenship of the Republic of Serbia. Of this number 437 persons were granted citizenship on the basis of Article 19 Law on Citizenship, while 645 persons were granted citizenship on the basis of other legal grounds.

Also, in 2025, 85 persons were granted citizenship on the basis of Article 19 Law on Citizenship, and 49 persons on the basis of other legal grounds.

[15] Decembar 29, 2025

Based on Article 19 Law on Citizenship, the procedure for verifying the fulfillment of the conditions for admission to citizenship is ongoing for 255 Russian citizens, while the procedure for verifying the fulfillment of the conditions is ongoing for 1,021 persons on the basis of other legal grounds.

An application for citizenship of the Republic of Serbia shall be submitted to the Interior body at the place of residence or stay of the applicant, and may also be submitted through the competent diplomatic or consular mission of the Republic of Serbia. An application for citizenship may be submitted in person or through an authorized representative.

In addition to the necessary documentation for citizenship, the most important document is a recommendation or proposal with justification for the admission to citizenship a foreigner, whose admission to citizenship of the Republic of Serbia would be in the interest of the Republic of Serbia. Relevant ministry submit recommendation to the Cabinet of Ministery of the Interior.

The Government of the Republic of Serbia decide on the admission to citizenship under Article 19 Law on citizenship.

The Serbian Ministry of the Interior carries out the procedure of verifying the fulfillment of the conditions for admission to citizenship in terms of cheking the documentation submitted by the applicant, obtains the opinion of the Security and Information Agency on the existence or absence obstacles for admission to citizenship of Serbia, performs checks through the available INTERPOL databases and technically drafts a proposal of decision for admission citizenship under Article 19 Law on Citizenship. Draft of decision for admission citizenship of Republici of Serbia, together with the recommendation letter of the competent authority and other documents, is forwarded to the Cabinet of Ministers for further processing, and delivering to the Government for deciding.

- Please inform about numbers/status of Turkish citizens in Serbia.

Ministry of Interior

At the end of year 2025, 350 citizens of the Republic of Turkey resided on the territory of the Republic of Serbia with approved permanent residence. Also, 6.096 citizens of the Republic of Turkey with approved temporary residence, on various grounds reside in Serbia.

- Please provide an update about ongoing efforts in negotiating readmission agreements and arrangements or improving practical cooperation on readmission with countries of origin.

Ministry of Interior

On March 13, 2025, the Readmission Agreement with Kazakhstan was ratified.

By initiating activities related to cooperation with countries of origin, the Republic of Serbia contributes to the implementation of the goals set by one of the pillars of the Western Balkans Action Plan, which relates to further improving cooperation with countries of origin. This activity also contributes to the fulfillment of the transitional benchmarks from Chapter 24, Subchapter Migration, which relates to improving cooperation with countries of origin of migrants.

During 2025, as a continuation of the activities, within the framework of the Project "Western Balkans Readmission Capacity Building Facility (WBCAP)", a meeting was held

with representatives of Bangladesh in May 2025 regarding the presentation of the Draft Memorandum between the Government of the People's Republic of Bangladesh and the Government of the Republic of Serbia on migration and mobility with standard operating procedures between Serbia and Bangladesh for the identification and return of illegally staying persons.

The competent authorities of Pakistan and Turkey have not yet responded to the previosu sent initiatives for concluding readmission agreement.

- Could you please update this paragraph for the entire year 2025? "In 2022, Serbia submitted 1 657 requests to foreign authorities for the readmission of third country nationals, of which 1 585 requests were approved and 191 individuals were returned from Serbia."

Ministry of Interior

In 2025, the authorities of the Republic of Serbia submitted 130 requests for the readmission of third-country nationals to foreign governments. Out of these requests, 84 were approved, 43 were denied, one request was suspended, and the procedures for two requests are still ongoing.

A total of 80 third-country nationals were returned from the Republic of Serbia to neighbouring countries under readmission agreements, with the majority being sent back to the Republic of Bulgaria (58 individuals).

- Could you please provide an update about ongoing measures to strengthen Serbia's capacity to provide voluntary return support as well as reintegration of irregular migrants?

Commissariat for Refugees and Migration

In 2025, significant progress was achieved in the process of institutionalizing the Assisted Voluntary Return and Reintegration (AVRR) Programme to the country of origin, as reflected in the following key aspects:

- A new Regulation establishing the Programme for Support to the Voluntary Return of Foreigners for the period 2026–2029 was adopted by the Government, providing the legal basis for the continuity and sustainability of activities in the field of voluntary return.
- The regular organization of information sessions in Reception Centres for Foreigners was initiated, with the aim of promoting the AVRR programme.
- Through the application of a mentoring approach, implemented by officers of the International Organization for Migration (IOM) using the "shadowing" methodology, individual counselling on voluntary return is jointly conducted.
- Training was provided to an additional group of officers of the Commissariat for Refugees and Migration of the Republic of Serbia for voluntary return counselling, thereby strengthening human resource capacities for the implementation of the AVRR programme.
- A working version of a Memorandum of Cooperation in the field of the AVRR programme between the Commissariat for Refugees and Migration and the International Organization for Migration was drafted, serving as a basis for further strengthening operational cooperation.

- Regular cooperation was established with ICMPD on supporting and strengthening national AVRR system.

Ministry of Interior

The Ministry of the Interior actively participates in the assisted voluntary return process for foreigners. This includes essential preparatory actions such as issuing return decisions, registering foreigners, collecting biometric data to establish identity for travel document issuance, and communicating with diplomatic and consular missions of the migrants' home countries. As a result, foreigners detained in detention centers can return to their countries of origin by utilizing the benefits of assisted voluntary return (AVRR).

In 2025, a total of 29 foreign citizens were removed from detention centers through the AVRR program facilitated by the Ministry of the Interior.

Furthermore, the Action Plan for the Implementation of the Integrated Border Management (IBM) Strategy for the period 2025-2027, adopted on December 26, 2025, sets specific objective 8.3—"Improvement of the Assisted Voluntary Return System." This objective outlines activities to be carried out by the Ministry of Interior in partnership with the Commissariat for Refugees and Migration.

Additionally, in collaboration with the International Organization for Migration (IOM) office in Belgrade, training sessions were conducted in 2025 for 25 police officers from the Border Police Directorate. These sessions focused on providing information to migrants undergoing return procedures in detention centers.

This initiative enhanced the knowledge and skills of police officers regarding the assisted voluntary return process for detainees. It is worth noting that this training was also recommended by FRONTEX as part of efforts to strengthen overall return capacity.

- Please inform about the negotiations and agreements with countries of origin, including Morocco and Bangladesh. Do the latest conclusions with Egypt and Uzbekistan on Labour Mobility also include (formal or informal) agreements on orderly migration and return and readmission (as COM has encouraged)?

Ministry of Interior

These memorandums aim to improve security upon the arrival of foreign workers, but also to establish a mechanism for the return of persons who do not, or no longer meet the conditions for legal stay in the territory of the Republic of Serbia. In this regard, when negotiating the conclusion of these agreements, the existence of provisions regarding return is insisted on.

As one of the steps to improve cooperation in the previous period, the text of the Memorandum of Understanding between the Republic of Serbia and Bangladesh in the field of migration and labor mobility continued to be harmonized. Annex 1 regulates the procedures and mutual relations of the return of Bangladeshi citizens to their country of origin. Annex 1 is a part of the MOU. The whole text is in line with similar MOUs that are in force between the EU and Bangladesh in the field of return and identification of persons who stay illegally.

Considering that the issues regulated by the draft Memorandum are in the jurisdiction of several state bodies (the Ministry of Labour, Employment, Veterans and Social Affairs, the

Ministry of Interior, and the Ministry of Foreign Affairs), work is underway to harmonize the text of the Memorandum, which will continue throughout 2026.
In 2025, a Memorandum of Understanding was concluded between the Ministry of Labour, Employment, Veterans, and Social Affairs of the Republic of Serbia and the Migration Agency under the Cabinet of Ministers of the Republic of Uzbekistan in the field of labour migration. The memorandum regulates cooperation in monitoring and implementing the legislation of the two countries in the field of labor migration, exchange of experience and knowledge in the field of employment, as well as the protection of the rights of foreign workers in the field of combating illegal employment.
At a bilateral meeting held at the end of 2025 with representatives of the Embassy of the Republic of Uzbekistan in Belgrade was submitted to MOI a draft Agreement between two countries, which, in addition to issues related to labor mobility contains provisions related to the return procedure of citizens of the two countries who do not meet or no longer meet the conditions for legal residence in the territory of the other contracting party.
Considering that the issues regulated by the draft Agreement fall within the competence of several state bodies (the Ministry of Labor, Employment, Veterans, and Social Affairs, the Ministry of Interior, and the Ministry of Foreign Affairs), work is underway to harmonize the text of the Agreement submitted by the Uzbek side.
With the Kingdom of Morocco, in 2025, there were no bilateral meetings on the topic of drafting a memorandum of understanding or standard operating procedures for the return of citizens of the Kingdom of Morocco who stay illegally on the territory of the Republic of Serbia to their country of origin.
In order to prepare a future cooperation document in this area, the Republic of Serbia participated in a workshop organized by ICMPD in May 2025, led by EU experts in the field of return from ICMPD, the Netherlands, Slovenia, and FRONTEX.
The workshop produced a Draft Standard Operating Procedures between Serbia and Morocco in the field of return, modeled on the document developed by the EU within the framework of cooperation in the field of return with Morocco.
The Ministry of Interior does not know that the Republic of Serbia signed a Memorandum or other document on labor mobility with Egypt in 2025.

- Could you please update this paragraph for assisted voluntary returns for the entire year 2025? “In 2022, 130 people were returned to their country of origin, of which 53 to India, 13 to Cuba, 10 to Tunisia, 10 to Jordan, 8 to Pakistan and 6 to Iraq”.

Commissariat for Refugees and Migration

“In 2025, 75 people were returned to their country of origin, of which 13 to India, 10 to Bangladesh, 9 to Nepal, 6 to Jordan, 5 to Syria, 4 to Iraq, 4 to Morocco and 4 to Russia”.

Ministry of Interior

In 2025, a total of 29 foreign citizens were assisted in returning to their countries of origin from detention centres for foreigners under the Ministry of the Interior. The breakdown is as follows:

- Bangladesh – 7
- India – 7
- Nepal – 6
- PR of China – 3
- Morocco – 2

- Sri Lanka – 2
- Russian Federation – 1
- Turkey - 1

  This marks a 90% increase compared to 2024, when 18 foreign nationals were returned from the detention center through the Assisted Voluntary Return and Reintegration (AVRR) program.

- Could you please provide the number of forced returns in 2025 from Serbia?
  - Overland to EU Member States
  - Overland to neighbouring countries
  - By air to countries of origin. Of which, how many involved Serbian escort officers flying with the returnee to the country of origin?

Ministry of Interior

a) In 2025, a total of 69 third-country nationals were forcibly returned by land from the detention center for foreigners to Bulgaria, an EU Member State, as part of the implementation of the Readmission Agreement with the EU. Additionally, two individuals were forcibly removed from the detention center for foreigners to land border crossings with EU member states, irrespective of the Readmission Agreement. This included one citizen from Austria and one from Hungary.
b) In 2025, there were a total of 4 foreign citizens forcibly removed and returned to borders with neighboring countries that are not members of the European Union. Specifically, 1 individual was returned to the border with Montenegro, and 3 individuals were returned to the border with Bosnia and Herzegovina.

c) In 2025, a total of 235 foreign citizens were escorted from the detention center for foreigners to the border crossing to carry out return decisions and leave Serbia. Of these individuals, 219 were taken to Nikola Tesla Airport, while 16 were escorted to Niš Airport. The majority of those leaving were citizens of China, totaling 152. Other notable nationalities included Nepal and India, each with 11 citizens, and Turkey and Sri Lanka, with 9 citizens each.The foreign citizens departed from the Republic of Serbia without a police escort.

- Please inform about the number of forced returns (by air or land) in 2025 which were monitored by the Ombudsman (Art. 82 Law on Foreigners).

Ministry of Interior

In 2025, a representative from the Office of the Ombudsman supervised the forced removal procedure in two cases. The Ombudsman's oversight occurred during the escort of foreign nationals from the detention center for foreigners in Padinska Skela and Plandište to the border crossing point. A total of seven foreign citizens were returned in these two cases: five from China and two from Israel.

Ombudsman

In 2025 (as of 25 December), the NPM carried out five monitoring activities of forced returns. This year, the NPM's focus was on the forced removals of women, so out of a total of 10 foreigners whose removal was monitored, 8 were women.

In two cases, the NPM monitored forced returns from the Reception Centres for Foreigners (Padinska Skela and Plandište) to Belgrade Nikola Tesla Airport. In these cases, a total of 7 foreign nationals, all women, were returned – two citizens of the State of Israel and five citizens of the People's Republic of China. In other three cases, the NPM monitored forced returns of two citizens of the Republic of Croatia, one of them woman, from the Police Department for the City of Belgrade by road transport to the border crossing with the Republic of Croatia and one citizen of Montenegro from the Police Department for the City of Belgrade by road transport to the border crossing with the Republic of North Macedonia.

The monitoring activities included interviews with foreign nationals subject to forced return regarding the conduct of officials towards them during deprivation of liberty, their stay in the facility, and the respect for their rights, as well as a review of the individual case files maintained in the reception centres or police department and monitoring of procedures preceding the forced return.

The NPM subsequently monitored the transport of foreign nationals to border crossing points and, in cases of road returns, the handover of foreign nationals to officials of the receiving State. In cases of returns carried out via an international airport, the escort of foreign nationals up to the aircraft was monitored. In the Republic of Serbia, the practice of police officers being present on board the aircraft during the forced return of foreign nationals has not yet been developed.

In relation to the monitoring of forced returns performed during 2024, a joint report was prepared and submitted at the beginning of 2025. Also, the NPM maintains a continuous dialogue with the Border Police Directorate of the Ministry of Interior and in December 2025 held a regular meeting with the management of the Directorate, which was dedicated to the NPM recommendations relating to the stay of foreigners in reception centres for foreigners and their forced removals.

- Please inform about how many full-time return caseworkers there are in the Ministry of Interior/ Border Police/ Department for Foreigners to realise forced returns.

Ministry of Interior

A total of 55 positions have been filled in the Border Police Directorate, specifically within the Department for Foreigners, Section for Reception and Accommodation of Foreigners. These positions are responsible for tasks related to the accommodation, security, and return of foreign citizens.

Within this group of permanently employed police officers, 14 are tasked with preparing for forced removals. Their responsibilities include handling the documentation necessary for returns, both to the country of origin and the country of previous entry. This involves preparing health documentation (such as "fit to fly" certificates), obtaining travel documents for return, and conducting interviews with individuals slated for removal.

By the end of 2025, the Ministry of Interior will have a total of 121 police officers—comprising escort leaders and escort officers—available to perform tasks related to forced removal. All of these officers have undergone FRONTEX training to effectively carry out activities associated with the forceful removal and escort of irregular migrants by air.

- Please inform about the implementation of a new ICT system on Foreigners, including the connection with existing databases on foreigners and their returns. What is the expected timeline for development and completion?

Ministry of Interior

In 2024, as part of the project "EU Regional Support to Sensitive Migration Management Systems in the Western Balkans, Phase III," FRONTEX conducted a GAP analysis of the Republic of Serbia's existing databases in relation to the RECAMAS model.

The analysis involved a comparison of national databases pertaining to irregular migrants, covering aspects from their registration and identification to the issuance of return decisions and the documentation of individuals who were forcibly or voluntarily returned to their countries of origin. Based on the findings of this analysis, recommendations were made to enhance the return case management system in Serbia, in line with the EU RECAMAS model.

Although the GAP analysis identified specific needs for improving the ICT infrastructure of the Ministry of Interior regarding return procedures, a detailed analysis of opportunities was conducted in 2025. A plan for the phased implementation of the recommendations was developed, prioritizing the most critical areas identified in the analysis. These initiatives were carried out in collaboration with the Border Police Directorate and the Information and Communication Technologies Sector of the Ministry of Interior.

The implementation of an upgraded ICT system for tracking return cases is planned as a continuous process, adhering to current legislation and the existing institutional and technical capacities of the Republic of Serbia. This process is set to continue through 2026. The goal of these activities is to gradually enhance the interoperability of electronic records maintained by the Ministry of Interior, related to entry, movement, residency, and asylum, efforts to combat irregular migration, readmission, and the return of foreigners.

In 2025, efforts to expand the accommodation capacity of the detention center for foreigners in Padinska Skela continued. Currently, the center has 60 places, but after the completion of the expansion work, expected by the end of 2026, the capacity will increase to 110 places.

The detention centers for foreigners in Dimitrovgrad and Plandište each have a capacity of 100 places. Overall, the existing facilities under enhanced police surveillance for accommodating foreigners are considered satisfactory.

Furthermore, in 2025, a total of 490 foreign citizens were housed in the detention centers in Padinska Skela, Dimitrovgrad, and Plandište. The majority of these individuals came from countries such as China, Bangladesh, Afghanistan, Nepal, India, Sri Lanka, and Turkey.

- Could you please update the paragraph for the entire year 2025? “As regards accommodation in open centres for irregular migrants, there are 11 reception/transit centres with a total capacity of 2 800 places in solid buildings; an additional 1 500 places for short stay could be made available in Rubb Halls. Including the 2 500 beds in asylum centres, the total number of available places amounts to 6 800. Since the number of migrants hosted

in government centres in 2023 fell to 2 200 on average, two reception centres (Divlijana and Bogovadja) were closed and two centres temporarily shut down."

Commissariat for Refugees and Migration

Currently, six reception and asylum centres are operational — Sjenica, Bujanovac, Principovac, Obrenovac, Vranje and Preševo. Of these, two centres are intended for the accommodation of families, one centre is designated for unaccompanied minors, and one centre is designated for Ukrainian nationals. In all centres, in line with available capacities and identified needs, migrants are provided with comprehensive support, including accommodation and food, basic healthcare, psychosocial support, legal assistance and information, educational and recreational activities, as well as support for voluntary return.

As regards accommodation in open centres for irregular migrants, there are 3 reception/transit centres with a total capacity of 1,060 places in solid buildings; Including the 1,350 (not included 155 in Vranje, for Ukraina citizens) beds in asylum centres, the total number of available places amounts to 2,410. Since the number of migrants hosted in government centres in 2024 fell to 700 on average and in 2025 fell to 360, 4 reception centres (Šid, Adaševci, Kikinda and Dimitrovgrad) and one asylum center (Krnjača) were closed and six centres temporarily shut down.

- Please inform on the status (and future plans) of the reception centres which were closed gradually as of November 2023 as a consequence of the anti-smuggling operation.

Commissariat for Refugees and Migration

Despite the reduced inflow, the Republic of Serbia remains consistent in its humane approach, with a clear commitment to ensuring dignified accommodation, healthcare and psychosocial assistance, as well as daily living support for migrants present on its territory. To date, more than one million migrants have passed through the Republic of Serbia, and the successful management of this challenge confirms the maturity and readiness of the state to respond to complex migration flows. Depending on the number of incoming migrants to the Republic of Serbia, asylum and reception centres will be opened or closed as necessary, with due regard to cost-effectiveness and available resources. In addition, there is a detailed contingency plan in place in the event of an increased inflow of migrants. The Response Plan for an Increased Number of Migrants on the Territory of the Republic of Serbia for 2025 was adopted in April 2025. In line with the Response Plan, the Commissariat for Refugees and Migration has introduced a new operational regime in reception and asylum centres, aimed at reducing costs and ensuring the efficient use of resources. Services provided in the centres continue to include accommodation, food, healthcare and psychosocial support, education and activities, with capacities tailored to different categories—families, unaccompanied minors and single adults. Currently, six reception and asylum centres are operational — Sjenica, Bujanovac, Principovac, Obrenovac, Vranje and Preševo. In addition, six asylum and reception centres—Tutin, Banja Koviljača, Pirot, Bosilegrad, Sombor and Subotica—are currently on standby. These centres can become fully operational, with a total capacity of 1,330 beds, within 72 hours if the need arises, i.e. in the event of an increased number of migrants.

- In case of increased arrivals to Serbia, it was indicated last year that the centres on standby (Subotica, Sombor, Adasevci, Bosilegrad, Pirot, Tutin and Banja Koviljaca) could be reopened in 72 hours. Could you please inform on whether this is still accurate?

Commissariat for Refugees and Migration

In case of increased arrivals to Serbia, it was indicated last year that the centres on standby (Subotica, Sombor, Bosilegrad, Pirot, Tutin and Banja Koviljaca) could be reopened in 72 hours. Total capacity of this centres is 1330 places.

- Could you please update this paragraph with numbers for the entire year 2025? "As regards detention capacities, the extension of the centre for foreigners in Padinska Skela is ongoing. It will provide an additional 60 places (bringing the total capacity to 110 places). In 2022, a total of 272 foreign nationals were placed in the detention centre for foreigners in Padinska Skela, mostly citizens of Afghanistan, Syria, Türkiye and India. The mobile centres in Dimitrovgrad and Plandiste for short-term detention, with a capacity of 100 places each, are used mainly in the context of readmission. In 2022, these facilities accommodated a total of 303 foreign nationals, mostly citizens from Afghanistan, Syria and Morocco."

Ministry of Interior

In 2025, efforts to expand the accommodation capacity of the detention center for foreigners in Padinska Skela continued. Currently, the center has 60 places, but after the completion of the expansion work, expected by the end of 2026, the capacity will increase to 110 places.

The detention centers for foreigners in Dimitrovgrad and Plandište each have a capacity of 100 places. Overall, the existing facilities under enhanced police surveillance for accommodating foreigners are considered satisfactory.

Furthermore, in 2025, a total of 490 foreign citizens were housed in the detention centers in Padinska Skela, Dimitrovgrad, and Plandište. The majority of these individuals came from countries such as China, Bangladesh, Afghanistan, Nepal, India, Sri Lanka, and Turkey.

- Please provide an update on the implementation of the third country national provision of the EU-Serbia Readmission Agreement, and specifically which practical solutions you have implemented to overcome remaining differences in the interpretation of Art 3 (1) b of the Agreement (resulting from translation of EURA) in readmission with the other than directly neighbouring EU Member States.

Ministry of Interior

Regarding third-country nationals, the Readmission Agreement with the European Community is fully implemented. In 2025, there was a significant decrease in the number of requests for the readmission of third-country nationals. A total of 250 readmission requests were submitted by member states, of which 204 were approved and 46 were not. The highest number of requests came from Croatia and Bulgaria.

- Could you please provide numbers on forced returns to Serbia from the EU for 2024 and 2025 with a breakdown into readmission of Serbia own nationals and third country nationals?

Ministry of Interior

In 2024, in accordance with the Readmission Agreement with the European Community, a total of 1,192 citizens of the Republic of Serbia and 421 citizens of third countries were returned to Serbia. Additionally, 125 third-country nationals were returned from Serbia under the same agreement.

In 2025, in accordance with the Readmission Agreement with the European Community, a total of 985 citizens of the Republic of Serbia and 179 citizens of third countries were returned to Serbia 60 third-country nationals were returned from the territory of the Republic of Serbia in accordance with the Readmission Agreement with the European Community .

- Please inform about implementation of the September 2022 Austria-Hungary- Serbia border management MoU.

Ministry of Interior

Pursuant to the Memorandum of Understanding signed by the Republic of Serbia, the Republic of Austria, and Hungary to strengthen trilateral cooperation in effectively combating illegal migration, police contingents from Austria (comprising 15-30 police officers) and Hungary (also consisting of 15-30 police officers) have been deployed to monitor the state border of Serbia with the Republic of North Macedonia since January 2023.

Moreover, the Border Police Directorate of Serbia has engaged up to 20 police officers to work alongside their counterparts from Austria and Hungary. Together, they are conducting operations aimed at suppressing irregular migration along this section of Serbia's state border.

The implementation of activities outlined in the Memorandum of Understanding significantly enhances Serbia's capacity to manage mixed migration flows. This initiative has been ongoing throughout 2025 and is also planned for continuation in 2026.

13.2. Asylum, including accommodation capacities

- Could you please update about developments as regards asylum seekers' access to the labour market?

Ministry of Interior

When it comes to improving the conditions for the employment of asylum seekers and persons granted asylum (asylum and subsidiary protection), i.e. temporary protection in the Republic of Serbia, we emphasize that the Law on the Employment of Foreigners ('Official Gazette of the Republic of Serbia', No. 128/2014, 113/2017, 50/2018, 31/2019 and 62/2023) introduced a new, more flexible concept of the employment of foreigners.

In this regard, we note that the aforementioned law stipulates that the right to work in the Republic of Serbia, without a single permit, is exercised by an asylum seeker who, within

a period of six months after submitting an asylum application, has not received a decision on their application through no fault of their own. This means that asylum seekers have full access to the labor market six months after submitting asylum application, if in that period decision has not been made, which is three months shorter than the provisions of the previous Law on the Employment of Foreigners.

Moreover, the same law stipulates that foreigners who have been granted the right to asylum and temporary protection exercise the right to work in the Republic of Serbia, without being issued a single permit.

The aforementioned legislative solutions have simplified access to the labor market for the aforementioned categories of foreigners.

Furthermore, the Law on the Employment of Foreigners stipulates the principle of equal treatment of foreign workers, thus guaranteeing foreign citizens employed in the Republic of Serbia the same rights and obligations in terms of work, employment and self-employment as citizens of the Republic of Serbia. These rights, among other things, include the right to adequate wages, safety and health at work, health care, as well as the right to other forms of protection enjoyed by citizens of the Republic of Serbia.

Foloowing the provisions of the Law on Simplified Employment in Seasonal Jobs in Certain Activities ("Official Gazette of the Republic of Serbia", No. 50/2018), asylum seekers can work in seasonal jobs in the agriculture, forestry and fisheries sectorsimmediately after being issued a foreigner's registration number, which means immediately after submitting the application.

In order to facilitate access to labour market to beneficiaries of international protection and asylum seekers, National Employment Service, UNHCR, and Commissariat for refugees and migration signed a Memorandum of Understanding. The agreed activities foresee information sessions for asylum seekers and persons granted asylum on the services provided by the NES (in Asylum centres and for those residing at private addresses), support in active job search, motivational activation seminar and development of individual employment plans. In order to further facilitate access to labour market UNHCR and Commissariat for refugees and migration established cooperation with ENIC/NARIC Centre responsible for recognition of foreign school documents.

Ministry of Labour, Employment, Veterans and Social Affairs

The amendments to the Law on the Employment of Foreigners, which entered into force in 2023, and whose full implementation began on 1 February 2024, regulated the issue of asylum seekers as follows: foreigners who have been granted asylum or temporary protection have free access to the labour market without the need to be issued a single permit, while asylum seekers who have not received a decision on their application for asylum within a period of six months after submitting their application for asylum, through no fault of their own, have limited access to the labour market while they are in the status of asylum seekers, i.e. access to work is enabled to them only after the expiry of a period of 6 months from the date of submitting their application for asylum.

Commissariat for Refugees and Migration

With the aim of facilitating access to the labour market, as of 1 February 2024 the application of new provisions of the Law on Employment of Foreigners began, which were

adopted by the National Assembly of the Republic of Serbia on 26 July 2023. The new provisions enable easier access to the right to work for both refugees and asylum seekers in the Republic of Serbia. The facilitations are reflected in employment and inclusion in the labour market without the requirement to obtain a single work permit for persons who have been granted international protection in the Republic of Serbia. Consequently, they are not required to pay fees or undergo complex administrative procedures. On the other hand, for asylum seekers, the facilitation is reflected in the shortening of the waiting period for access to the labour market from 9 to 6 months from the moment of submitting an asylum application (with the certificate of a submitted asylum application serving as proof). This also represents a significant step towards full alignment with the time frame of 3 months, which is the practice in European Union countries.

The Tripartite Memorandum of Understanding between the Commissariat for Refugees and Migration, UNHCR and the National Employment Service, signed in July 2021, commits all three parties, within the task of better understanding the specific status of asylum seekers and refugees, to facilitating access to the labour market and to joint work by all the aforementioned parties towards achieving their economic independence. In this regard, during meetings held in 2025 between the Commissariat, UNHCR and the National Employment Service, further steps were agreed within the framework of assistance and support for the inclusion of asylum seekers and persons granted international protection into the labour market. **Given that the issue concerns asylum seekers, the main steps relate to:**

• categorising refugees and asylum seekers into appropriate categories within the database, in order to ensure that statistical data reported are aligned with the legislation governing this area (the Law on Foreigners, the Law on Asylum, and the Law on Employment of Foreigners);

• including asylum seekers in the category of "hard-to-employ persons";

• organising employment information sessions in asylum centres (AC Obrenovac, AC Sjenica);

• continuing the publication of job vacancies in asylum centres;

• entrepreneurship training, with a focus on starting one's own business for asylum seekers

• organizing information sessions in cooperation with UNHCR under the title "Employment Corners", providing information in asylum centres on the private sector and employers, with the aim of facilitating access to the labour market and labour market opportunities for asylum seekers;

• job fairs organized by the National Employment Service, with the participation of representatives of the Commissariat and UNHCR.

- Please provide an update about steps taken to improve capacities of the Asylum Office, including training of staff, number of staff dealing with the examination of applications, trainings/ on-the-job coaching, etc. with the view to ensure timely processing of requests, quality assurance of the decision making, and reaching out to migrants in need of protection.

Ministry of Interior

Pursuant to Article No. 195, 185b, 165 and 166 of the Law on Police ("Official Gazette of the RS", No. 6/2016, 24/2018 and 87/2018), Rulebook on internal organization and

systematization of jobs in the Ministry of Internal Affairs I 01-021-1147/23-5 of 03.05.2023., Regulation on amendments and supplements to the Regulation Int. 01 number: 021-486/25 -3 of 11.3.2025., Int 01 number: 021- 486/25-17 of 26.3. 2025., Int. 01 number: 021-822/25-22 of 2.7.2025 and Int, 01 number: 021 -1604/25 of 3.9 2025., 28 jobs have been systematized in the Asylum Office, as follows:

Head of the Asylum Office – 1;

- Police officers-2

Department for determining the right to asylum

- Head of Department – 1;
- Police officers of Department – **15**;

Department for collecting and documenting data on countries of origin (County of origin information Department- COI)

- Head of Department – 1;
- - Police officers of Department – **8**.

Out of a total of 28 workplaces, 25 workplaces have been filled.

Asylum Office officials continuously improve their skills through various types of training, seminars, workshops, on-the-job training, etc., which further contributes to improving the quality of the asylum procedure, the quality of decisions made, the quality of reports on the countries of origin as well as additional professional affirmation of officials who perform tasks within the competence of the Asylum Office. Regarding to this, the most significant trainings are provided by European Asylum Agency (EUAA) and UNHCR . In this regard, we highlight the most significant trainings implemented in cooperation with experts engaged by the European Asylum Agency (EUAA) and UNHCR, which are implemented both through the bilateral cooperation of the Ministry of Interior with the EUAA, then through the annual training plan implemented by the EUAA, as well as within the framework of activities through the Roadmap on Cooperation or as part of multi-beneficiary projects intended for regional cooperation in the Western Balkans. Some of these trainings were also attended by police officers who are the first line of contact with asylum seekers.

During 2025., the following trainings has been performed:

Trainings organized by the European Union Agency for Asylum (EUAA):

1. Training on “Inclusion”;
2. Training on “Inclusion advanced”;
3. Training on “Evidence Assessment”;
4. Training on “Interviewing Methods”;
5. Online training on “Interviewing children”;
6. Training „On the job training“ with EUAA experts regarding to quality assurance in the Asylum Office and the monitoring and evaluation of asylum legislation;
7. Workshop on the development and implementation of legal guidelines in accordance with the Convention relating to the status of refugees (2 special workshops in accordance with the Convention Grounds of Persecution)

8. Regional training „COI & Country Guidance Workshop on Iran“;
9. Regional Workshop “Legal Protection of Unaccompanied Children within the Framework of International Protection”;
10. Online briefings regarding the current situation in the countries of origin: Iran;
11. Training on “Becoming a Trainer and Assessor for the European Asylum Agency”;
12. Training on “Victims of Gender-Based Violence”;
13. Training on “Identifying Potential Victims of Trafficking in Human Beings among Migrant Populations”
14. Training on “Gender, Gender Identity and Sexual Orientation”;
15. Training on “Public Speaking and Persuasive Communication”;
16. Online Briefing on the Current Situation in the Country of Origin – Iraq;
17. Online Regional Information Session on Expert Networks;
18. Online training "Desining communication strategy and providing information".

Trainings organized by UNHCR:

1. Training „Application of Article 31 (1) of the Convention relating to the Status of Refugees and Article 8 of the Law on Asylum and Temporary Protection - the principle of non-punishment of judges and judicial assistants in misdemeanor courts“;
2. Seminar/lecture for judges of the Administrative Court;
3. Seminar/lecture for judges of Minor Offences Courts on the topic „Application of Article 31(1) of the Convention on the Status of Refugees and Article 8 of the Law on Asylum and Temporary Protection - the principle of non-punishment” at the Judicial Academy in Belgrade;
4. Lecture on the Law on Asylum and Temporary Protection to students at the Refugee Law Clinic of the Faculty of Law in Belgrade;
5. Seminar „Asylum Procedure Standards”;
6. Training „Border Procedure and Procedure in the Airport Transit Zone (implementing partner in the project);
7. Training/lecture „Asylum procedure and the importance of interpretation in the procedure“;
8. Training „The importance of translation in the asylum procedure“.

Other trainings of Asylum Office police officers:

1. Workshop Individual measure for strengthening the management system of irregular migration in the fight against organized crime in the Western Balkans for 2024, organized by the European Commission
2. Workshop (webinar) “Classification of National Regulations in Accordance with EU Regulations and Legal Techniques for Drafting Laws”, organized by the Ministry for European Integration in cooperation with the Hanns Seidel Foundation
3. Prague Process Webinar “Displaced from Ukraine: Three Years After - Challenges and Prospects”
4. Training for trainers “Working with vulnerable groups”

5. Specialized training “Neuroscience in the Service of Communication with Victims of Human Trafficking”, organized by the ATINA association
6. Training of authorized persons in handling requests for free access to information of public importance
7. Coordination meeting of Individual Measures, related to the project “European Union Support to Migration Management in Serbia - Promoting a Positive Narrative on Refugees and Migrants, Strengthening Social Cohesion and Improving Migration and Asylum Policies”
8. Training of police officers to complete the process of introducing the redesigned/improved application "Event Log"
9. Training of authorized official on handling requests for free access to information of public importance
10. Workshop "Development of a decision-making support system at the national level", organized by the Republic Statistical Office
11. Presentation on the topic "Implementation of an application for quality control and assurance"
12. Fourth technical workshop within the project "Improving Migration Management in the Western Balkans"
13. Workshop presenting the Report on Alternatives to Detention, organized by IOM - one of the activities of the project "EU Regional Support to Sensitive Migration in the Western Balkans", phase 3
14. Regional Conference on Alternatives to Immigration Detention in the Western Balkans
15. Workshop on “Contingency Response Plan”, organized by FRONTEX;
16. Conference “EU Support to Migration Management in Serbia: Promoting the Integration of Refugees and Migrants”, organized by KIRS
17. Regional Workshop “Challenges of Mixed Migration in the Republic of Serbia”, within the project “Promoting Evidence-Based Migration Management to Strengthen the Development Potential of Migration”, organized by KIRS
18. Workshop on Strengthening Regional Cooperation in Migration Management: Identifying Needs, Gaps and Future Priorities, organized by MARRI
19. Training "Strengthening the capacity of service providers and decision-makers from state institutions of the Republic of Serbia regarding the situation of LGBT refugees, asylum seekers and persons on the move" as part of the EU4FAST project
20. Training "Management and conflict resolution skills", organized by NAJU.

Considering the competences of the Asylum Commission and the Administrative Court in the asylum procedure, we also state the following:

Administrative Court

In 2025, the President of the Administrative Court, judges and other representatives of the Administrative Court, as participants in the asylum procedure, participated in the following activities:

1. 2. Webinar “Asylum and Human Rights: Recent Case Law of the Court of Justice of the EU and the European Court of Human Rights”, organized by the Academy of European Law and the Judicial Academy;
2. Study visit to Strasbourg to participate in the High-Level Round Table on “News in Judicial Dialect through the Case Law of the European Court of Justice, the European Court of Human Rights and National Courts in the Field of International Protection”, organized by the EUAA;
3. As part of the Roadmap for Cooperation between the EUAA and the Republic of Serbia, the EUAA provided extensive training and support to improve the technical skills and knowledge of asylum officers, COI officers, the Asylum Commission and judges of the Administrative Court. In order to ensure that the examination of appeals is carried out efficiently, it is planned to strengthen the technical capacity of the members of the Asylum Commission and judges of the Administrative Court, in particular in relation to the concept of international protection. This will contribute to improving the overall quality of decisions;
4. “Basic Course on International Protection - Qualification for Asylum Procedures for International Protection, Evidence and Credibility Assessment”, organised by the EUAA;
5. A total of 15 judges and 5 assistant judges of the Administrative Court participated in a workshop on international protection, organised by the EU for Asylum, with the support of UNHCR;
6. Workshop “Vulnerability in the Context of Requests for International Protection”, organized by EUAA.

- Please inform about how you have improved the monitoring of the implementation of asylum legislation. Last year it was indicated that a pilot report covering six topics (access to the procedure, misuse of the asylum system, reception and integration, length of the procedure, quality of the decision and return of the rejected applicants) would be developed by July 2025. Could you please inform on whether this report has been prepared? What are the main findings?

Ministry of Interior

Within the Action Plan for Chapter 24, Sub-Chapter Asylum, an activity entitled "Monitoring and Evaluation of Legislation in the Asylum System" has been defined, as well as an activity from the Roadmap on Cooperation between the Republic of Serbia and the EUAA for achieving the objective "Asylum legislation and procedures are aligned with the CEAS (Common European Asylum System) and EU practices", which foresees the implementation of a framework for periodic monitoring and evaluation of the asylum procedure.

Based on the Matrix for the Assessment and Monitoring of Legislation, the Asylum Office has developed a pilot version of the assessment and monitoring matrices as well as a monitoring report (qualitative analysis of the results obtained). The pilot report included a sample of data from 2022, bearing in mind that in 2023 and 2024, the Asylum Office faced organizational changes that led to postponement of the asylum procedure and delays in decision-making.

The pilot report prepared with data from 2022 was submitted to the European Asylum Agency (EUAA) for expert review, after which a "peer to peer" session was held. The pilot report assessed indicators that relate exclusively to the first-instance asylum procedure, such as access to the procedure, the length of the asylum procedure and the quality of decisions. The EUAA praised the efforts of the Asylum Office in preparing such a monitoring report, noting that this activity will be carried out continuously from 2026.

The most significant recommendations of the EUAA related to the need for further improvement of future reporting, among others, in the areas of selecting a representative sample, greater emphasis on qualitative analysis, updating existing indicators, as well as the introduction of a new indicator related to the collection of information on countries of origin.

Following the methodology presented and the results of this activity during the evaluation visit of EUAA experts, it is planned that the monitoring and assessment of legislation will be carried out continuously from 2026. Also, in order to improve the asylum procedure, the introduction of a system for assessing the quality of the asylum procedure using digital tools was initiated. In this regard, in 2025, the possibility of taking over and introducing an existing tool developed by EUAA (QAT- Quallity Assurance Tool) at the level of the Asylum Office was considered. Given certain limitations of this solution, an initiative was launched by the Ministry of the Interior to develop its own tool.

Commissariat for Refugees and Migration

Since the Roadmap for Cooperation between the Republic of Serbia and the European Union Agency for Asylum (EUAA), aimed at strengthening the asylum and reception system in line with the Common European Asylum System and EU standards for the period 2025–2027, was signed at the end of October 2025, therefore, the pilot reports have not been developed and this activity is postponed.

- Please provide an update on the average time between the registered intention to apply for asylum and the lodging of applications to the Asylum Office.

Ministry of Interior

The Law on Asylum and Temporary Protection ("Official Gazette of RS" No. 24/18), Article 36, Paragraphs 1 and 2, prescribes that the asylum procedure is initiated by lodging asylum application to an authorized official of the Asylum Office, on the prescribed form no later than within 15 days from the day of registration, i.e. if an authorized official of the Asylum Office does not enable a foreigner who has been issued a Asylum Seekers' Certificate to submit an asylum application within the the time limit specified in paragraph 1 of this article, the applicant may do so by filling in an asylum application form within eight days after the expiry of the time limit specified in paragraph 1 of this article.

Bearing in mind the basic principles prescribed by the Law on Asylum and Temporary Protection, the provision of article 4, paragraph 1 of the aforementioned law, which stipulates that foreigner who is in the territory of the Republic of Serbia shall have the right to express his/her intention to file the application for asylum or to file the application for asylum in the Republic of Serbia, in line with the law, as well as the principles of international law related to the protection of the rights of asylum seekers and refugees, persons whose intention to submit an application for asylum is registered, it is possible to submit an application for asylum even after the deadline has expired prescribed by law. In

this sense, we note that the reasons for possibly missing the deadlines prescribed by law are evaluated in each specific case within the asylum application review procedure, and in relation to the specific, individual circumstances of the applicant.

In addition to the above, we point out that the largest number of persons who have expressed their intention to apply for asylum and who have been issued a Asylum Seekers' Certificate never submit an application for asylum to the Asylum Office, which can be seen from the statistical data that we present below.

Based on a pilot analysis (taking 2022 as an example), it was observed that the average time from the moment of the expressed intention of a foreigner to apply for asylum in the Republic of Serbia, deviates to a certain extent from the standards provided for by the legal regulation. The same can largely be attributed to allowing asylum applications to be filed after the prescribed deadline.

- Please provide an update about the situation of available translators on the labour market and about steps taken to facilitate the outsourcing of the translation function.

Ministry of Interior

When it comes to translation, as in previous years, UNHCR continues to assist in this field trought established database of translators for rare languages, as well as by financing translation services in asylum procedures from its own funds.

Considering the obligations of the Republic of Serbia arising primarily from the provisions of the Law on Asylum and Temporary Protection, and in order to create a basis for the Republic of Serbia, i.e. the Ministry of the Interior, to independently, from its own budget, provide interpreters in the asylum procedure, UNHCR has prepared an analysis of the engagement of interpreters in the asylum procedure by the Ministry of the Interior. An applicable translation model is expected to be developed in the coming period.

Please note that the Office for Asylum has systematized 3 positions for translators who participate in translating asylum applications and hearing asylum seekers from English and Spanish. Out of the systematized 3, 1 positions have been filled.

- Please provide an update on activities to improve access to the asylum procedure and the provision of information to the migrants regarding the asylum procedure, as well as access to information and legal counselling for asylum seekers at Belgrade, Nis and Kragujevac airports.

Ministry of Interior

Article 56 of the Law on Asylum and Temporary Protection "Information and Legal Aid" stipulates that a foreigner who has expressed the intention to seek asylum in the Republic of Serbia, as well as an applicant, shall be entitled to be informed of his rights and obligations throughout the entire asylum procedure.

After the registration procedure has been carried out, according to Article 35 of the Law on Asylum and Temporary Protection, a foreigner who has expressed his intention to submit an application for asylum in the Republic of Serbia, becomes familiar with the rights and obligations related to the initiation of the asylum procedure by police officers, as well as upon arrival at the accommodation capacity to which he was sent.

In addition to the above, we note that Article 41, paragraph 2 of the Law on Asylum and Temporary Protection stipulates that the representatives of the organisations providing legal aid to asylum seekers and persons who have been granted asylum shall have effective access to border crossings, or transit zones in airports or inland water ports, in accordance with the regulations on the protection of national borders.

At the largest border crossings, police stations, reception centre for foreigners, as well as asylum centers and open-type reception centers, there are notices about organizations that provide legal aid and support to asylum seekers.

In cooperation with UNHCR, an information brochure for asylum seekers was produced, translated into the most widely spoken languages of the countries from which persons who express their intention to apply for asylum come. The brochure was published on the website of this ministry in December 2022. Information brochures are also available at the airports in Belgrade, Niš and Kraljevo.

In the first quarter of 2025, posters with QR codes and available information on access to the asylum procedure for potential asylum seekers were distributed again.

In order to adequately apply the law, the module entitled "Implementation of the Law on Asylum and Temporary Protection" and the module "Human Rights" are part of the basic training program for police officers, as well as the specialized training program for border police officers, and in this regard, work is being done to regularly improve the capacity of police officers and border police officers who first come into contact with potential asylum seekers.

During 2025, officers of the Asylum Office implemented 8 trainings for 129 officers of the first line of control of this Ministry in accordance with the Program Content for the Implementation of Problem-Based Learning "Implementation of the Law on Asylum and Temporary Protection" and "Respect and Protection of Human Rights in the Integrated Border Management System".

In addition to the above, officers of the Asylum Office and border police officers at the Belgrade, Niš and Kraljevo airports participated in the training "Border Procedure and Procedure in the Airport Transit Zone" organized by UNHCR as an implementing partner in the Project "Improving Migration Management, the Rights of Persons in Need of International Protection and Vulnerable Individuals in Mixed Migratory Movements", which is the result of cooperation between the Ministry of the Interior and the SDC.

The implementation of the above trainings directly affects the implementation of activity 2.1.3 of the Action Plan for Chapter 2, sub-chapter Asylum, i.e. the efficiency of access to the asylum procedure.

- Please provide an update about steps taken to implement asylum border procedures, envisaged by the law on asylum at the Belgrade airport.

Ministry of Interior

The adoption of the new Asylum Law will also provide for changes to the provisions relating to the implementation of the asylum procedure in the transit zone and at border crossings, which will be harmonized with European Union regulations, primarily the Pact on Asylum and Migration.

We note that the implementation of the provisions of the law related to the implementation of transit and asylum procedures at border crossings will also depend on the possibilities

(financial and technical) for equipping premises at Belgrade Airport and border crossings for these purposes.

The asylum seeker information panel is available on the website of the Ministry of Interior

In February 2022, at the airport "Nikola Tesla" Belgrade, the airport operator, Belgrade Airport doo, provided a space for the accommodation of foreigners who do not meet the conditions for entering the country, which has been in operational use since May 2022.

- The space is located in a secured - restrictive zone, on the platform, under the A10 gate, with a total area of 130m2 and consists of the following rooms:

a. one male room with toilet (8 beds)

b. one women's room with toilet (8 beds)

c. one room for accommodation of mother with children, with toilet (4 beds)

d. two rooms for the accommodation of persons who disturb the order in this room - each with a toilet (4 beds in total)

e. one room with video surveillance with a toilet

f. one toilet for the disabled

The total accommodation capacity in the mentioned space is for 24 people.

In addition to the above-mentioned brick building, there is also a fenced area for living in the open space and walking, with a total area of 45m2.

Also, if persons need free legal aid, they can obtain it even if they are in the accommodation area for persons who have been refused to entry the country. In the mentioned area, a free telephone is available for persons to use, and in visible places there are posters of non-governmental organizations and other institutions for the provision of legal aid and the realization of human rights.

While persons are accommodated in this area, it is secured by the constant presence of a police officer and a foreigner can express his intention to seek asylum at any time.

During 2025, 8 trainings were implemented for 129 first-line control officers of this ministry in accordance with the Program Content for the Implementation of Problem-Based Learning "Implementation of the Law on Asylum and Temporary Protection".

Also, as a result of fruitful cooperation between the Ministry of Internal Affairs and the State Secretariat for Migration of the Swiss Government (SEM), the Project "Improving Migration Management, the Rights of Persons in Need of International Protection and Vulnerable Individuals in Mixed Migration Movements" was adopted, with an implementation period of 36 months (2025-2028). From the aspect of improving the implementation of border procedures and asylum procedures in the transit zone, first outcome of Project is particularly significant, which is among others, planned the following project activities:

- Training of members of the Border Police Directorate on the treatment of persons who express their intention for asylum at the border crossing or in the transit zone;
- Training of officers of the Asylum Office on the treatment of persons who lodged asylum aplication at the border or at the airport transit zone (competent authorities, conditions and method of conducting the procedure, deadlines, restriction of movement during the procedure, special deadlines, right to appeal, access to the territory, etc.);

– Defining minimum standards of material conditions for the above-mentioned categories of persons in accordance with the recommendation of the European Committee for the Prevention of Torture and relating to issues of accommodation, access to information, medical and legal assistance, translation services, etc. Development of Standard Operating Procedures - model procedure in the transit area and material standards in accordance with EU standards.

- Please provide an update about steps taken to implement transit procedures and accommodation at the airport, as envisaged by the law on asylum.

Ministry of Interior

The adoption of the new Asylum Law will also provide for changes to the provisions relating to the implementation of the asylum procedure in the transit zone and at border crossings, which will be harmonized with European Union regulations, primarily the Pact on Asylum and Migration.

We note that the implementation of the provisions of the law related to the implementation of transit and asylum procedures at border crossings will also depend on the possibilities (financial and technical) for equipping premises at Belgrade Airport and border crossings for these purposes.

- Please provide an update about progress with regards to improving the interconnection between the single biometric database used by the police and the electronic database managed by the Asylum Office.

Ministry of Interior

The AFIS biometric database and the "Asylum" alphanumeric database are continuously improved and gradually adapted to EU standards, with the aim of interconnecting them as soon as possible.

In this regard, this ministry, both independently and through various projects funded by the European Union, is taking the necessary steps to create the conditions for connection to the EURODAC system of the European Union, upon accession.

Within the project entitled "EU Support for Migration Management - Strengthening of Migration Management and Border Control", one of the activities is related to the development of software for connecting existing databases into a coherent and interoperable database, among others, databases of biometric data on asylum seekers, and an alphanumeric database maintained within the Asylum Office.

Through the Twinning project “Support to preparation for participation in EUROSUR network and EURODAC system”, analysis of the legislative, institutional and information system of this Ministry was delivered, and based on that analysis recommendations for changes that need to be made in order for the Republic of Serbia to be able to fully participate in the interoperable systems common to all EU member states and EURODAC system, at the time of EU accession were made.

Moreover, within the project "EU Regional Support to Sensitive Migration Management Systems in the Western Balkans - PHASE III", an activity is foreseen, implemented by FRONTEX, which relates to the development of Masterplans related to the establishment of the EURODAC system (basis for cooperation, exchange of letters between the Minister

of Interior and the European Commission), in which the Republic of Serbia will participate. The draft Masterplan, as well as other documents necessary for the development of the IT system, have been developed and are currently being considered by the competent authorities of the Republic of Serbia.

- Please inform about how many persons that received international protection have received travel documents (as provided by the law on asylum and temporary protection). Please inform on whether obstacles still exist for holders of such documents in order to facilitate access to their socio-economic rights. Have there been steps taken to improve the situation?

Ministry of Interior

A total of 58 travel documents were issued for persons granted asylum, while during 2025, travel documents were issued for 10 persons granted asylum.

Commissariat for Refugees and Migration

Travel documents are not the basis for access of migrants to socio-economic rights. ID card for asylum seekers and persons that have received international protection is. Both documents are issued by MoI, but for different purposes. There are still some issues related to access to complete health services and financial services (opening of bank accounts with commercial banks) which are being addressed by relevant national authorities.

- Please provide an update about the number of unaccompanied or separated children which were accommodated in Serbian reception facilities and what sustainable solutions are developed in order to ensure their protection.

Commissariat for Refugees and Migration

The total number of unaccompanied minors registered in all asylum and reception centres managed by the Commissariat for Refugees and Migration during 2025 was 1,537. In the Principovac Centre, which is designated exclusively for the accommodation of unaccompanied minors, an average of 8 unaccompanied minors were accommodated during 2025 (with a maximum of 38 and a minimum of 0 unaccompanied minors accommodated at any given time during the year in this centre).

Ministry of Labour, Employment, Veterans and Social Affairs

Centres for social work, as primary social protection institutions, in addition to their work in exercising the right to financial assistance, are most engaged in providing guardianship protection for children separated from their parents/guardians and migrant children unaccompanied by their parents/guardians.

Family Law[16] stipulates that a child without parental care – a minor ward – is placed under guardianship, and that the guardianship authority may decide to appoint a temporary guardian for the ward, as well as for a child under parental care, or to a person with legal

[16] *Official Gazette of the RS,* No. 18/05 and 72/11-other law.

capacity, if it deems it necessary for the temporary protection of the person, rights or interests of those persons.

The Law on Asylum and Temporary Protection[17] provides that asylum seekers and persons granted asylum in the Republic of Serbia have the right to financial social assistance. The Rulebook on Social Assistance for Persons Seeking or Granted Asylum[18] specifies that they may exercise this right if they are accommodated outside an asylum centre, i.e. in private accommodation paid for from their own funds. These persons exercise the right to social assistance in the same manner and under the same conditions as citizens of the Republic of Serbia, in the form of monthly financial assistance through the centre for social work in the territory of the municipality in which they reside. The conditions for exercising the right to monthly financial assistance are determined once a year.

Another aspect of social protection covered by the Law on Asylum and Temporary Protection relates to accommodation in social protection institutions for particularly vulnerable groups of refugees and asylum seekers. Namely, for persons who, due to their psychophysical condition, cannot be accommodated in asylum centres and for children without parental care, based on a decision of the guardianship authority, accommodation may, exceptionally, be provided in a social protection institution, with another social protection service provider, or in a foster family.[19] The costs of this accommodation are borne by the Commissariat for Refugees and Migration.

One of the social protection services is the **accommodation service for minors**, as well as for adults, provided for by the Law on Social Protection[20], which can be:

- placement in kin, foster or other family,
- placement in a home,
- placement in a shelter,
- and other types of accommodation.[21]

Social protection institutions provide urgent and temporary care for children who need this type of support. The institutions provide temporary protection for children, until more permanent forms of child protection are found and provided in the community.

In the **social protection system** of the Republic of Serbia, the capacities of specialized social protection institutions in Belgrade and Niš are used for unaccompanied minors, namely:

- Institute for the Education of Children and Youth, Belgrade – Centre for Accommodation of Minor Foreigners Unaccompanied by Parents/Guardians;
- Institute for the Education of Children and Youth, Niš – Centre for the Accommodation of Minor Foreigners Unaccompanied by Parents/Guardians.

The accommodation capacities of the above-mentioned work units are a total of 15 places in Belgrade and 15 in Niš. The Ministry of Labour, Employment, Veteran and Social Affairs continuously provides material and personnel support to social protection institutions, along with infrastructure works and the purchase of furniture for institutions in Belgrade and Niš, in order to improve the quality of the services provided.

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[17] *Official Gazette of the RS,* No. 24/18.

[18] Rulebook on Social Assistance for Persons Seeking or Granted Asylum – *Official Gazette of the RS,* No. 44/08 and 78/11.

[19] Article 52 of the Law on Asylum and Temporary Protection.

[20] Article 40 of the Law on Social Protection.

[21] Члан 47. Закона о социјалној заштити

Social protection institutions for the accommodation of unaccompanied minors are obliged to provide the minor with: safety, health care in accordance with health regulations, existential conditions (housing, adequate nutrition in accordance with the calendar age, national and religious origin of the child, clothing, footwear, hygiene products, etc.), organization of free time, upbringing, education in accordance with legislation.

According to the Law on Social Protection, unaccompanied migrant and refugee children have the right to accommodation in these institutions with the purpose of providing them with safe accommodation services. Children are provided with temporary guardianship, which involves taking measures to protect the interests of minors (providing an interpreter, familiarizing them with their current status and rights, psychological and legal assistance, initiating a procedure depending on whether the minor wishes to return to their country of origin or seek asylum in the Republic of Serbia, organizing free time, etc.).

Accommodation capacities are separate for boys and girls (out of 30 places – 20 is for boys and 10 for girls). The facilities in Belgrade and Niš are also equipped with a sports playground, library, computers, internet, and are open-type. By respecting the institution's house rules, children can go out when they want to take a walk, go to school, to a store, etc. **Publikacija-USTANOVE.pdf (euinfo.rs)**

The time spent in the institution is structured. Educators, together with other professional workers and with the support of OCDs, create and implement group and individual activities and workshops in accordance with the interests and needs of the children. Also, the work plan and program foresee periodic trips outside the institution, visits to museums, shopping for clothes in shopping malls, visits to sports events, etc.

Other shelters for children in the territory of the Republic are also ready to take care of minors on the move in the form of short-term accommodation, if necessary.

Accommodation is temporary and may last until the moment the minor migrant expresses his/her desire to obtain asylum, in accordance with the *Law on Asylum*, when he/she is provided with accommodation in the **Asylum Centre**.

According to the data available to us:

1.The Belgrade Institute for the Education of Children and Youth, the Regional Centre for the Accommodation of Minor Foreigners Unaccompanied by Parents or Guardians, has a capacity for 12 beneficiaries. In the Centre for the Accommodation of Minor Foreigners Unaccompanied by Parents or Guardians in Belgrade, in the period from January to December 2025, a total of 23 new admissions were made. A total of 7 beneficiaries stayed on from 2024 into 2025. In the case of an influx of a larger number of beneficiaries, technical requirements in terms of the number of beds exist.

2. In the Centre for the Accommodation of Minor Foreigners Unaccompanied by Parents or Guardians in Niš, in the period from January to December 2025, there were 113 beneficiaries in the accommodation, all of whom were male. The majority were in the age group of 14-17. Regarding possible additional capacity for unforeseen/emergency situations, the facility in Niš has a space of 32 m^2 (the space was renovated in 2022 by the IOM) where there is room for another 4-6 minor foreign nationals, with the note that the space is not equipped with furniture and equipment.

During 2017, the Minister responsible for social protection issued the ***Instruction on actions of centres for social work and residential social protection institutions in providing protection and accommodation for unaccompanied minor migrants***, which was delivered to all social protection institutions. The Instruction sets out the duty of institutions to ensure – in accordance with the principle of protecting the rights of

migrants, taking into account to the greatest possible extent the specificity of their needs and interests, and respecting ratified international treaties and rules of international law, measures of family and legal protection – guardianship and accommodation services. Identification of unaccompanied minor migrants is carried out through observation and interviews. The centre for social work is obliged to provide accommodation, health care, existential needs and protection of rights and interests (representation) to the minor migrant. The Instruction determines all the obligations of centres for social work, as well as the obligations of accommodation institutions, and foster families. The Instruction was amended in 2018 when a new ***Instruction was adopted on actions of centres for social work - guardianship authorities in implementing the accommodation of unaccompanied minor migrants/refugees*** in accordance with international standards and recommendations of UN agencies.

Immediately upon receipt of a written or spoken notification from an outreach social worker, Ministry of Interior, Police Directorate - Border Police Administration, Commissariat for Refugees and Migration, or an NGO that, in accordance with a special mandate, carries out assistance and support to migrants and refugees in formal reception centres or informal gathering places of such persons, about a minor migrant-refugee at risk and found unaccompanied by a responsible adult at risk in the territory of its local and actual jurisdiction, the centre for social work is obliged to provide such a minor with:

1. safety (safe accommodation);
2. health care;
3. existential needs (food, clothing, footwear, personal hygiene);
4. protection of rights and interests (representation).

The aforementioned instruction prescribes a protection plan for the guardianship authority (centre for social work), accommodation institutions, as well as outreach workers and guardians, in the event of an emergency admission of a foreign minor. Upon receipt of information or direct knowledge of the existence of a foreign minor, the territorially competent guardianship authority is notified and a temporary guardian for the foreign minor is appointed. After the first interview, the minor must be provided with adequate accommodation in accordance with his or her best interests and with respect for the principle of full participation. A foreign minor may be placed in a foster family, a social protection institution, a health care institution if his or her health condition requires it, or an asylum centre, if the minor has applied for asylum.

If it is a child traveling with parents, the family is placed in a reception centre managed by the **Commissariat for Refugees and Migration (CRM)**.

In the period from 2015 to 2023, over 1,000 unaccompanied minors were placed in social protection institutions (about 10% of the total number of those placed in the territory of the Republic of Serbia), while the rest were placed in asylum centres and reception centres managed by the CRM.

In March 2024, the Government of the Republic of Serbia adopted the ***Response Plan to the Increased Number of Migrants in the Territory of the Republic of Serbia***, thus continuing an effective system of protection for migrants and asylum seekers. The adoption of the Plan enabled the continuation of appropriate assistance to migrants and asylum seekers in the form of accommodation, nutrition, hygiene, health care and social protection, and access to education. The capacities of the Institution for the Education of Children and Youth in Belgrade and the Institution for the Education of Children and Youth in Niš are intended to accommodate the increased influx of unaccompanied minor

migrants and are included in the Response Plan for 2024. Support will continue to be based on respecting the principles of respecting the individuality, culture and history of each individual, the right to participation, inclusion and a dignified life in the community.

In the coming period, the social protection system will pay special attention to the development of community-based services that have shown positive results and are well accepted by migrants, such as the **outreach worker service**, which has been implemented in a number of local self-governments for many years, but which we currently do not have data on since it is not yet licensed and the system only monitors licensed service providers. The development of this service requires standards that will define the service, as well as procedures for its establishment in local communities.

There are three accredited training programs in the social protection system that focus on working with the migrant population and are intended for professional workers to improve their competencies. These are:

- Basic training program for outreach workers of centres for social work in working with refugees and migrants
- Improving the quality of psychosocial support services (PSS) in working with the migrant population in Serbia
- Training of social service providers in working with child asylum seekers, with a special focus on victims of gender-based violence[22]

The social protection system also has accredited training programs that address particularly vulnerable groups, including the migrant population:

- Support for victims of human trafficking in the social protection system – detection, needs assessment and support planning
- Identification, assistance and protection of male victims of human trafficking
- Centre for social work in the protection of victims of human trafficking
- Alternative care and children's rights in Serbia[23]

As part of the implementation of the activities of the UNICEF Work Plan in Serbia for 2023-2024, UNICEF has developed **child-friendly information materials on the asylum process** for two age groups (7-12 and 13-18 years of age) and translated them into multiple languages. These materials were developed in cooperation with the CRM, Asylum Office, Ministry of Labour, Employment, Veteran and Social Affairs and UNHCR and are available in all asylum/reception centres, as well as in **social protection institutions** for the accommodation of unaccompanied and separated children as inter-agency materials, that also serve the CRM and MoLEVSA to meet the EUAA standards for the accommodation of unaccompanied and separated children.

In addition to information materials on the asylum procedure, at the request of the CRM, information materials on house rules for reception/asylum centres are in the final stages of development and will be available for the same two age groups (7-12 and 13-18) and translated into multiple languages of the beneficiaries. These materials will be distributed and promoted through information sessions in reception and asylum centres organized in cooperation with the CRM.

[22] Republic Institute for Social Protection, Catalogue of accredited training programs, available at Podrška marginalizovanim grupama (zavodsz.gov.rs)
[23] Ibid.

UNICEF continues to co-chair the Working Group on the Protection of Refugee and Migrant Children together with MoLEVSA and CRM, ensuring a coordinated response and timely identification of challenges and common solutions.

Ministry of Interior

Centres for social work, as primary social protection institutions, in addition to their work in exercising the right to financial assistance, are most engaged in providing guardianship protection for children separated from their parents/guardians and migrant children unaccompanied by their parents/guardians.

Family Law[24] stipulates that a child without parental care – a minor ward – is placed under guardianship, and that the guardianship authority may decide to appoint a temporary guardian for the ward, as well as for a child under parental care, or to a person with legal capacity, if it deems it necessary for the temporary protection of the person, rights or interests of those persons.

The Law on Asylum and Temporary Protection[25] provides that asylum seekers and persons granted asylum in the Republic of Serbia have the right to financial social assistance. The Rulebook on Social Assistance for Persons Seeking or Granted Asylum[26] specifies that they may exercise this right if they are accommodated outside an asylum centre, i.e. in private accommodation paid for from their own funds. These persons exercise the right to social assistance in the same manner and under the same conditions as citizens of the Republic of Serbia, in the form of monthly financial assistance through the centre for social work in the territory of the municipality in which they reside. The conditions for exercising the right to monthly financial assistance are determined once a year.

Another aspect of social protection covered by the Law on Asylum and Temporary Protection relates to accommodation in social protection institutions for particularly vulnerable groups of refugees and asylum seekers. Namely, for persons who, due to their psychophysical condition, cannot be accommodated in asylum centres and for children without parental care, based on a decision of the guardianship authority, accommodation may, exceptionally, be provided in a social protection institution, with another social protection service provider, or in a foster family.[27] The costs of this accommodation are borne by the Commissariat for Refugees and Migration.

One of the social protection services is the accommodation service for minors, as well as for adults, provided for by the Law on Social Protection[28], which can be:

a. placement in kin, foster or other family,
b. placement in a home,
c. placement in a shelter,
d. other types of accommodation.[29]

Social protection institutions provide urgent and temporary care for children who need this type of support. The institutions provide temporary protection for children, until more permanent forms of child protection are found and provided in the community.

[24] *Official Gazette of the RS*, No. 18/05 and 72/11-other law.
[25] *Official Gazette of the RS*, No. 24/18.
[26] Rulebook on Social Assistance for Persons Seeking or Granted Asylum – *Official Gazette of the RS*, No. 44/08 and 78/11.
[27] Article 52 of the Law on Asylum and Temporary Protection.
[28] Article 40 of the Law on Social Protection.
[29] Члан 47. Закона о социјалној заштити

In the **social protection system** of the Republic of Serbia, the capacities of specialized social protection institutions in Belgrade and Niš are used for unaccompanied minors, namely:

a. Institute for the Education of Children and Youth, Belgrade – Centre for Accommodation of Minor Foreigners Unaccompanied by Parents/Guardians;
b. Institute for the Education of Children and Youth, Niš – Centre for the Accommodation of Minor Foreigners Unaccompanied by Parents/Guardians.

The accommodation capacities of the above-mentioned work units are a total of 15 places in Belgrade and 15 in Niš. The Ministry of Labour, Employment, Veteran and Social Affairs continuously provides material and personnel support to social protection institutions, along with infrastructure works and the purchase of furniture for institutions in Belgrade and Niš, in order to improve the quality of the services provided.

Social protection institutions for the accommodation of unaccompanied minors are obliged to provide the minor with: safety, health care in accordance with health regulations, existential conditions (housing, adequate nutrition in accordance with the calendar age, national and religious origin of the child, clothing, footwear, hygiene products, etc.), and organization of free time, upbringing, and education in accordance with legislation.

According to the Law on Social Protection, unaccompanied migrant and refugee children have the right to accommodation in these institutions with the purpose of providing them with safe accommodation services. Children are provided with temporary guardianship, which involves taking measures to protect the interests of minors (providing an interpreter, familiarizing them with their current status and rights, psychological and legal assistance, initiating a procedure depending on whether the minor wishes to return to their country of origin or seek asylum in the Republic of Serbia, organizing free time, etc.).

Accommodation capacities are separate for boys and girls (out of 30 places – 20 is for boys and 10 for girls). The facilities in Belgrade and Niš are also equipped with a sports playground, library, computers, internet, and are open-type. By respecting the institution's house rules, children can go out when they want to take a walk, go to school, to a store, etc. **Publikacija-USTANOVE.pdf (euinfo.rs)**

The time spent in the institution is structured. Educators, together with other professional workers and with the support of OCDs, create and implement group and individual activities and workshops in accordance with the interests and needs of the children. Also, the work plan and program foresee periodic trips outside the institution, visits to museums, shopping for clothes in shopping malls, visits to sports events, etc.

Other shelters for children in the territory of the Republic are also ready to take care of minors on the move in the form of short-term accommodation, if necessary.

Accommodation is temporary and may last until the moment the minor migrant expresses his/her desire to obtain asylum, in accordance with the *Law on Asylum*, when he/she is provided with accommodation in the **Asylum Centre**.

According to the data available to us:

a. The Belgrade Institute for the Education of Children and Youth, the Regional Centre for the Accommodation of Minor Foreigners Unaccompanied by Parents or Guardians, has a capacity for 12 beneficiaries. In the Centre for the Accommodation of Minor Foreigners Unaccompanied by Parents or Guardians in Belgrade, in the period from January to December 2025, a total of 23 new admissions were made. A total of 7 beneficiaries stayed on from 2024 into 2025. In the case of an influx of a larger number of beneficiaries, technical requirements in terms of the number of beds exist.ž

b. In the Centre for the Accommodation of Minor Foreigners Unaccompanied by Parents or Guardians in Niš, in the period from January to December 2025, there were 113 beneficiaries in the accommodation, all of whom were male. The majority were in the age group of 14-17. Regarding possible additional capacity for unforeseen/emergency situations, the facility in Niš has a space of 32 m^2 (the space was renovated in 2022 by the IOM) where there is room for another 4-6 minor foreign nationals, with the note that the space is not equipped with furniture and equipment.

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The aforementioned instruction prescribes a protection plan for the guardianship authority (centre for social work), accommodation institutions, as well as outreach workers and guardians, in the event of an emergency admission of a foreign minor. Upon receipt of information or direct knowledge of the existence of a foreign minor, the territorially competent guardianship authority is notified and a temporary guardian for the foreign minor is appointed. After the first interview, the minor must be provided with adequate accommodation in accordance with his or her best interests and with respect for the principle of full participation. A foreign minor may be placed in a foster family, a social protection institution, a health care institution if his or her health condition requires it, or an asylum centre, if the minor has applied for asylum.

If it is a child traveling with parents, the family is placed in a reception centre managed by the **Commissariat for Refugees and Migration (CRM)**.

In the period from 2015 to 2023, over 1,000 unaccompanied minors were placed in social protection institutions (about 10% of the total number of those placed in the territory of the Republic of Serbia), while the rest were placed in asylum centres and reception centres managed by the CRM.

In March 2024, the Government of the Republic of Serbia adopted the ***Response Plan to the Increased Number of Migrants in the Territory of the Republic of Serbia***, thus continuing an effective system of protection for migrants and asylum seekers. The adoption of the Plan enabled the continuation of appropriate assistance to migrants and asylum seekers in the form of accommodation, nutrition, hygiene, health care and social protection, and access to education. The capacities of the Institution for the Education of Children and Youth in Belgrade and the Institution for the Education of Children and Youth in Niš are intended to accommodate the increased influx of unaccompanied minor migrants and are included in the Response Plan for 2024. Support will continue to be based on respecting the principles of respecting the individuality, culture and history of each individual, the right to participation, inclusion and a dignified life in the community.

In the coming period, the social protection system will pay special attention to the development of community-based services that have shown positive results and are well accepted by migrants, such as the **outreach worker service**, which has been implemented in a number of local self-governments for many years, but which we currently do not have data on since it is not yet licensed and the system only monitors licensed service providers. The development of this service requires standards that will define the service, as well as procedures for its establishment in local communities.

There are three accredited training programs in the social protection system that focus on working with the migrant population and are intended for professional workers to improve their competencies.

These are:

- Basic training program for outreach workers of centres for social work in working with refugees and migrants
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- Training of social service providers in working with child asylum seekers, with a special focus on victims of gender-based violence[30]

The social protection system also has accredited training programs that address particularly vulnerable groups, including the migrant population:

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- Centre for social work in the protection of victims of human trafficking
- Alternative care and children's rights in Serbia[31]

As part of the implementation of the activities of the UNICEF Work Plan in Serbia for 2023-2024, UNICEF has developed **child-friendly information materials on the asylum process** for two age groups (7-12 and 13-18 years of age) and translated them into multiple languages. These materials were developed in cooperation with the CRM, Asylum Office, Ministry of Labour, Employment, Veteran and Social Affairs and UNHCR and are available in all asylum/reception centres, as well as in **social protection institutions** for

[30] Republic Institute for Social Protection, Catalogue of accredited training programs, available at Podrška marginalizovanim grupama (zavodsz.gov.rs)
[31] Ibid.

the accommodation of unaccompanied and separated children as inter-agency materials, that also serve the CRM and MoLEVSA to meet the EUAA standards for the accommodation of unaccompanied and separated children.

In addition to information materials on the asylum procedure, at the request of the CRM, information materials on house rules for reception/asylum centres are in the final stages of development and will be available for the same two age groups (7-12 and 13-18) and translated into multiple languages of the beneficiaries. These materials will be distributed and promoted through information sessions in reception and asylum centres organized in cooperation with the CRM.

UNICEF continues to co-chair the Working Group on the Protection of Refugee and Migrant Children together with MoLEVSA and CRM, ensuring a coordinated response and timely identification of challenges and common solutions.

- Please provide an update about amendments to Serbian legislation as regards effective 'access to the procedure' (Article 36 of the law on asylum and temporary protection), 'appeal bodies', 'rights and obligations of applicants/persons under international protection', 'free legal aid', and 'safe third country procedure'.

Ministry of Interior

In August 2025., Border Police Directorate start an initiative to Police Directorate and Secretariat of MOI, to set up a working group for new Law of asylum and temporary protection, with primarily considering changes to EU regulations through the new approach to migration (Pact on Migration and Asylum). The Republic of Serbia is monitoring the implementation of regulations within the framework of the Pact on Migration and Asylum and will amend the legislative framework accordingly.

- Please provide an update on how you will ensure continuity of the temporary protection provided to Ukrainian citizens.

Ministry of Interior

The Government of the Republic of Serbia adopted on March 15, 2024. The Decision on providing temporary protection to displaced persons coming from Ukraine while there are reasons for its approval, without setting a final deadline, which is a change compared to previous Decisions of the Government of the Republic of Serbia. Individual decisions for displaced persons are adopted for a period of one year, at the request of the displaced person.

- Could you please update this paragraph for the entire year 2025? "Out of the 4 243 individuals who expressed the intention to seek asylum and obtained a registration certificate, only 320 officially lodged an asylum application. The absconding rate remains higher than 50%, while subsidiary statuses are accorded more extensively than refugee statuses. In 2022, decisions were made on a total of 2 302 individuals. Only 10 asylum seekers received refugee status, 20 received subsidiary protection, while 62 had their asylum request denied. In 257 cases, the procedure was discontinued because the applicant absconded. For 1 164 citizens of Ukraine a certificate on registration of intention for temporary protection was issued and 1115 decisions on granting temporary protection were delivered."

Ministry of Interior

Out of the 624 individuals who expressed the intention to aplly for asylum and obtained a registration certificate, only 133 lodged an asylum application. The absconding rate remains higher than 50%. In 2025, decisions were made on a total of 1.743 individuals. For 2 persons refugee status was approved, 5 received subsidiary protection, while 121 had their asylum request denied. In 87 cases, the procedure was discontinued because the applicant absconded. For 387 displaced persons from Ukraine a certificate on registration of intention for temporary protection was issued and 1.253 decisions on granting temporary protection were delivered."

13.3. Combatting migrant smuggling

- Could you please provide an overview of the migrant smuggling situation in Serbia in 2025? Please provide an update on Serbia's legal framework to combat migrant smuggling as an organised crime offence. Please provide an update on the modi operandi of criminal gangs operating on the territory of Serbia and Bosnia and Herzegovina, which increasingly use violence against migrants and in some cases abduct and extort them.

Ministry of Interior

In 2025, a reduced number of irregular migrants was registered on the territory of the Republic of Serbia. As a result of the above, a smaller number of criminal charges were filed due to reasonable suspicion that the criminal offense of Illegal Crossing of the State Border and Smuggling of People under Article 350 of the Criminal Code of the Republic of Serbia was committed, compared to 2024.

In 2025, a total number of 136 criminal charges were filed (in the same period in 2024, 327), against 189 people smugglers (in the same period in 2024, 426), of which 3 criminal charges were filed against 26 members of organized criminal groups.

Although the largest number of arrested citizens are Serbian citizens (126), organized criminal groups consisting of foreign citizens are engaged in human smuggling in Serbia (of the total number of arrested persons 63 are foreigners, mostly from Afghanistan (17), Turkey (16), Azerbaijan (7), China (7), etc.

The largest criminal networks and individuals in this crime area originate from Afghanistan, Syria and Pakistan. During various stages of smuggling, most often during the immediate crossing of the state border, they use violence against migrants and kidnappings in order to extort money from their families.

Among the individuals, members of Afghan groups stand out, operating in territory of the Republic of Serbia, but also in Bulgaria, Bosnia and Herzegovina, Croatia, Slovenia, Italy, and Western European countries.

The modes of smuggling, in aim to enable the unauthorized transit of irregular migrants on the main roads through Serbia, also include enabling the unauthorized crossing of the state border on foot or by overcoming obstacles - cutting the wire on the protective fence towards Hungary, crossing the river using boats towards Bosnia and Herzegovina and Croatia, and hiding in loaded motor vehicles on the border towards Croatia, while crypto currency transactions are used to pay for smuggling services, beside already established Hawala system.

In order to adequately respond to the increased violence by individual people smugglers, the Operational Task Force (OTF) Zebra was formed at EUROPOL, and the Serbian Ministry of the Interior is a member.

Within this working group, data on modus operandi and suspects, high-value targets, and ongoing investigations is exchanged via the SIENA channel.

Participation in this group resulted in several arrests of high-value targets on the territory of Serbia, based on international arrest warrants issued by other members of the operational working group.

- Please provide an update on the activity of the special task force set up at central level to combat organised migrant smuggling.

Ministry of Interior

In November 2023, a Working Group was established at the central level of the General Police Directorate of Police to address security challenges stemming from the significant influx of irregular migrants into the Republic of Serbia.

The Working Group's primary responsibilities include monitoring developments along the entry and exit routes at Serbia's borders with neighboring countries. They are tasked with implementing measures to prevent and combat illegal border crossings, as well as addressing other crimes associated with irregular migration, such as violence and injuries within the migrant population, drug abuse, and illegal trafficking of weapons.

Until 2025, the Working Group continued to enforce measures aimed at maintaining a favorable security and migration situation along the Western Balkan route, which passes through Serbia.

In October 2025, the European Commission approved a grant of EUR 1 million "EU Support to the Fight against Migrant Smuggling in the Republic of Serbia." This grant serves as a two-year support initiative, co-financed by the Ministry of the Interior, specifically for the implementation of police operations focused on state border surveillance.

Throughout 2025, the Working Group addressed the cases of 9,480 irregular migrants who were discovered either residing illegally or attempting to cross the state border. Additionally, they seized 40 firearms and 1,160 pieces of ammunition related to 39 incidents linked to criminal groups involved in human smuggling within Serbia.

- Please provide an update on Serbia’s participation in the EMPACT Operational Action Plan Migrant Smuggling.

Ministry of Interior

The participation of the Ministry of the Interior in the EMPACT platform, led by EUROPOL, for the Operational Action Plan (OAP) 2024-2025, focusing on the priority of human smuggling has significantly increased compared to the previous period. In 2025, Serbia is set to participate in seven activities, up from four in 2023.

Participation in the EMPACT platform not only involves data exchange within these activities but also emphasizes the continuous education of police officers in combating human smuggling. This education is facilitated through CEPOL platforms, EUROPOL workshops, and collaborations with non-state actors such as the IOM, UN, and OSCE.

For the upcoming EMPACT cycle, OAP 2026-2029, Serbia plans to engage in five activities, three of which will be in the role of a collider. These activities are as follows:

1. OA 1.1, led by Europol, focusing on *"Criminal Intelligence Picture on Migrant Smuggling."*
2. OA 2.3, led by Germany, concerning *OP RISK* and reported as a collider.
3. OA 2.8, led by Europol, addressing *"Targeting the Online Footprint of Criminal Networks Involved in Migrant Smuggling"*
4. OA 4.1, led by the United Kingdom Police, dealing with *Mapping Havaladar*, reported as a collider.
5. OA 6.1, led by the Austrian police, focused on the *Working Group Western Balkans* (TFWB), also reported as a collider.

- Please provide an update on the actions taken, at national level and in partnership (across the region and with EU Member States), to combat migrant smuggling in line with the Global Alliance against Migrant Smuggling launched by the European Commission on 28 November 2023 and in which Serbia participated.

Ministry of Interior

The Criminal Police Directorate of the Ministry of Interior, specifically the Service for Combating Organized Crime, is actively participating in one Joint Investigation Team (JIT) and three EUROPOL Operational Task Forces (OTF) within its competencies, in line with the objectives of the Global Alliance against Smuggling.

Currently, with the support of the EU through the EU4FAST project, operational meetings are being held with countries in the region and EU member states. These meetings aim to identify potential common targets and organized crime groups that will be the focus of investigations, and may also be addressed in the context of an OTF or JIT.

13.4 Border management cooperation with Frontex and operational cooperation with neighbours

- Please inform about plans for upgrading equipment and infrastructure at the borders/border crossings, as well as human resources. Has an investment plan for infrastructure and equipment been developed?

Ministry of Interior

On December 31, 2025, there will be 178 employees in the position of combating cross-border crime and irregular migration. Additionally, on December 31, 2025, 304 employees focused on combating irregular migration within regional police departments.

Republic Directorate for the Property

In the scope of their authorities and in line with in the scope of their authorities and in line with the funds allocated by the Budget Law for the year 2026" ("Official Gazette of the Republic of Serbia", No. 108/2025), Property Directorate of The Republic of Serbia has made the financial plan for the year 2026 which includes next activities:

- Procurement of maintenance and emergency intervention services at border crossings, in the total amount of RSD 170.000.000,00 (VAT included)
- Procurement of services for the preparation of technical and spatial planning documentation for a number of Border crossing points (Kelebija, Strezimirovci, Ljuba, Jaša Tomic, Kaludjerovo, Djerdap 1, Šid, Jabuka, Ribarci), in the total amount of RSD 112.500.000,00 (VAT included)
- Works for the replacement of control booths and modular containers at border crossing points, in the total amount of RSD 60.000.000,00 (VAT included)
- Works for the replacement of the truck weighbridge at the Gradina Border Crossing Point, in the total amount of RSD 6.000.000,00 (VAT included)
- Supply of equipment for the needs of Border Crossing Points (diesel generator sets, CCTV cameras, vehicle lifting equipment, new automatic barriers, new air-conditioning units), in the total amount of RSD 23.000.000,00 (VAT included)

- Please inform about Serbia's own financial resources that have been and will be mobilised in support of IBM operations.

Ministry of Interior

The Border Police Directorate has developed a comprehensive Requirements Plan for 2026. This plan outlines the necessary material and technical resources, as well as other support, needed to effectively carry out tasks related to integrated border management. The document specifies various needs, including advanced surveillance technology, communication equipment, training programs for personnel, and improvements to facilities. By addressing these requirements, the Directorate aims to enhance border security, improve operational efficiency, and ensure the effective implementation of policies related to border management.

- Please provide an update on cooperation with neighbouring countries, including numbers of joint patrols.

Ministry of Interior

The Border Police Directorate fully implements the signed agreements and protocols established on the basis of the Convention on Police Cooperation in Southeast Europe, as well as on the basis of signed Agreements on Police Cooperation with neighbouring countries. Joint/mixed patrols, despite signed agreements and protocols, are not being conducted with the border authorities of the Republic of Croatia due to the refusal of the Croatian side, despite all the created preconditions. With the Republic of Albania, Agreements and Protocols related to this matter have not yet been adopted.

Joint/mixed patrols

In 2025, a total of 1673 joint patrols were carried out, as follows:

1. with the border authorities of Hungary, a total of 251 patrol activities, 126 on our side and 125 on the territory of Hungary,

2. with the border authorities of Romania, a total of 796 patrol activities, 398 on our side and 398 on the territory of Romania,
3. with the border authorities of the Republic of Bulgaria, a total of 277 patrol activities, 139 on our side and 138 on the territory of the Republic of Bulgaria
4. with the border authorities of the Republic of North Macedonia, a total of 95 patrol activities, 48 on our side and 47 on the territory of the Republic of North Macedonia
5. with the border authorities of Montenegro, a total of 133 patrol activities, 68 on our side and 65 on the territory of Montenegro
6. with the border authorities of Bosnia and Herzegovina, a total of 121 patrol activities, 59 on our side and 62 on the territory of Bosnia and Herzegovina

Joint contact services (centres/offices)

- Following the needs related to strengthening and further improving police cooperation with all countries in the immediate region, this Ministry has carried out a series of activities to establish and operate joint contact services (centres/offices) based on the Convention on Police Cooperation in Southeast Europe (Vienna 2006) or bilateral agreements on police cooperation.

Hungary

- Pursuant the Article No. 20 of the Agreement between the Government of the Republic of Serbia and the Government of Hungary on border control in road, rail, and water transport, the establishment of a joint contact centre in Hungary at the Horgoš–Röszke border crossing is planned. A Protocol was signed between the Ministry of Interior of the Republic of Serbia and the Ministry of Interior of Hungary on the establishment and functioning of the Joint Contact Center, on July 1, 2014.The Rules of Procedure for the work of the Horgoš–Röszke Joint Contact Center were signed on August 26, 2014; The Joint Contact Center in its work mainly relies on the application of the Agreement between the Republic of Serbia and the Republic of Hungary on cooperation between law enforcement authorities in preventing cross-border crime and combating organized crime (participating in forwarding requests between law enforcement authorities of the contracting parties, if the information is requested by law enforcement authorities competent in the border area and if the information related exclusively to the border area or possibly if the exchange of information through liaison officers would cause a delay that could jeopardize the interests of clarifying a criminal offense, based on urgency); The Joint Contact Center officially began operations on 01.09.2014, the Hungarian side has been present since July 2014, while the Serbian side was sent to the Joint Contact Center on 04.08.2014 to coordinate records and prepare joint forms used by both Contracting Parties.

Romania

- Pursuant the Article 34, paragraph 1, in connection with Article 29 of the Convention on Police Cooperation in Southeast Europe, it was signed the Protocol between the Ministry of Interior of the Republic of Serbia and the Ministry of Interior of Romania on the establishment and functioning of the joint contact office on the Serbian-Romanian border, on May 31, 2013, in Bucharest;
- An Agreement on Cooperation in Combating Organized Crime, International Illegal Drug Trafficking, and International Terrorism between the Government of Romania and the Government of the Republic of Serbia was signed;

- The Rules of Procedure on the Organization and Functioning of the Serbian-Romanian Joint Contact Office Portile de Fier 1 were signed on December 16, 2016, at the premises of the joint contact office;
- The Joint Contact Office began its operations on December 16, 2016;

Bulgaria

- Agreement between the Government of the Republic of Serbia and the Government of the Republic of Bulgaria on the establishment and operation of the Joint Contact Centre for police and customs cooperation, signed on April 26, 2010, in Belgrade;
- Rulebook on the organization and operation of the Kalotina Joint Contact Centre, signed on September 16, 2011, in Dimitrovgrad;
- The Joint Contact Center for police and customs cooperation was established on the territory of the Republic of Bulgaria at the Kalotina border crossing and started its operation on December 19, 2012;

Republic of North Macedonia

- The protocol between the Ministry of Interior of the Republic of Serbia and the Ministry of Interior of the Republic of North Macedonia on the establishment and operation of the Joint Contact Center for police cooperation was signed in Ljubljana on February 28, 2011;
- The Rulebook on the work of the Joint Contact Centre was signed on 28.12.2013 at the Tabanovce border crossing, and it prescribes the manner of operation of the JCC, the organization of activities, the cooperation between officials of the competent authorities of the Contracting Parties to the Protocol, as well as the manner of operation and the competence of the joint commission;

  The Joint Contact Center for police cooperation of the Republic of Serbia and the Republic of North Macedonia began its operations on 28.12.2013 at the Tabanovce border crossing;

Montenegro and Bosnia and Herzegovina

- Based on Article 34, Paragraph 1, and Article 29 of the Convention on Police Cooperation in Southeast Europe, on December 20, 2013, a Protocol was signed between the Ministry of Interior of the Republic of Serbia, the Ministry of Security of Bosnia and Herzegovina, and the Ministry of Interior of Montenegro on the establishment and functioning of a joint center for police cooperation in Trebinje, after which the Rules of Procedure for the joint center for police cooperation were adopted.
- The trilateral Joint Center for Police Cooperation in Trebinje began its operations on November 25, 2014. Representatives of the Border Police of the Republic of Serbia took active part in the work of the center on December 28, 2015.

Croatia

- The joint contact service was established on the basis of the Police Cooperation Agreement signed between the Government of the Republic of Serbia and the Government of the Republic of Croatia on May 25, 2009 in Rijeka (Law on the ratification of the Agreement between the Government of the Republic of Serbia and the Government of the Republic of Croatia on Police Cooperation of December 29, 2010), in relation to which a Protocol was signed between the Ministry of Interior of the Republic of Serbia and the Ministry of

Interior of the Republic of Croatia on the establishment of a joint contact service at the Bajakovo–Batrovci border crossing and Rules of Procedure were adopted. The joint contact service at the Serbian-Croatian border started operating on June 22, 2011.

Review of information exchanged with neighbouring border authorities through Joint Contact Centres in 2025

JCC TOTAL EXCHANGED REQUESTS FOR 2025				
No	**neighbouring country**	**forwarded requests from our side**	**forwarded requests from another country**	**Total**
1	Hungary	197	191	388
2	Romania	142	143	285
3	Bulgaria	250	176	426
4	Republic of North Macedonia	333	44	377
5	Montenegro and Bosnia and Herzegovina	1004	3465	4.469
6	Croatia	48	61	109
TOTAL		**1.974**	**4.080**	**6.054**

- Please provide an update on your engagement under the Austria-Hungary-Serbia MoU in light of the status agreement allowing for the deployment of the standing corps to Serbia's non-EU borders as well. Has this cooperation continued and if so, how have you safeguarded it against operational overlaps?

Ministry of Interior

Since January 11, 2023, based on the Memorandum of Understanding between the Republic of Serbia, the Republic of Austria and Hungary on strengthening trilateral cooperation in the field of effective combating illegal migration, which was adopted by Government Conclusion 05 No.: 018-9248/2022 of 16.11.2022, police contingents of Hungary and the Republic of Austria, which number 15-30 police officers on average, have been deployed at the state border of the Republic of Serbia towards the Republic of North Macedonia, using their own vehicles and technical equipment for border surveillance.

The cooperation achieved is very important for the Border Police Directorate and the Ministry of the Interior as a whole, because through the joint work of police officers of the Republic of Serbia, Hungary and the Republic of Austria, experience and best practices are exchanged in the application of operational-tactical and operational-technical measures and actions on the border line and in the border area, which relate to the effective suppression

of irregular migration and cross-border crime, the identification of migratory movements and the adoption and undertaking of operational-tactical measures, actions and procedures that would completely prevent illegal activities at the state border.

Operational overlaps - No operational overlaps.

Although, alongside the implementation of cooperation with the border authorities of Hungary and the Republic of Austria based on the trilateral cooperation agreement, the joint operation with the European Border and Coast Guard Agency (Based on the Agreement between the Republic of Serbia and the European Union on operational activities conducted by the European Border and Coast Guard Agency in the Republic of Serbia) is also being carried out, there are no operational overlaps.

This is the result of continuous operational planning and directing regular and additional forces to the most vulnerable parts of the state border of the Republic of Serbia. As previously mentioned, within the framework of trilateral cooperation, police officers from Hungary and the Republic of Austria are deployed at the state border of the Republic of Serbia with the Republic of North Macedonia, while the current operational area of action and joint work of the border authorities of the Republic of Serbia and members of the European Border and Coast Guard Agency is at the state border of the Republic of Serbia with Hungary, Republic of Bulgaria and Bosnia and Herzegovina.

13.5. Implementation of Strategy and Action plan for Integrated Border Management and Schengen Action Plan

- Please inform about the implementation of the integrated border management strategy and action plan.

Ministry of Interior

During the government session of the Republic of Serbia held on December 26, 2025, the Action Plan for 2025-2027 was adopted. This plan aims to implement the Strategy for Integrated Border Management in the Republic of Serbia for the period 2022-2027.

The process of establishing a Coordinating Body, which will be responsible for monitoring both the Strategy and the Action Plan for integrated border management, is currently underway. The adoption of this body is expected in the near future.

- Please provide an update on the implementation of the Schengen action plan.

Ministry of Interior

The Action plan for the Republic of Serbia's entry into the Schengen area represents a development document of the Republic of Serbia, aimed at fulfilling the obligations arising from the negotiations for Serbia's accession to the European Union, that is, the interim criteria in the field of external borders and Schengen, as well as activities from the revised Action Plan for Chapter 24 – Justice, Freedom, and Security in the short term, with the aim of obtaining the criteria for closing Chapter 24 – Justice, Freedom, and Security, and ultimately, achieving the standards necessary for the country's entry into the Schengen area, strengthening institutional, administrative, and technical capacities, as well as aligning with the EU *acquis* in the field of external borders and Schengen, all with the aim of preparing for the Schengen evaluation process.

The implementation of the action plan is a strategic process that takes place over several years and requires coordination among various institutions. The key focus is on strengthening borders, security, and justice in order to meet the criteria for closing Chapter 24 and entering the Schengen Area.

Key objectives of the action plan

Normative alignment: harmonization with EU legal *acquis* in the area of justice, freedom, and security. The legislation of the Republic of Serbia concerning border control, movement and residence of foreigners, combating cross-border crime and irregular migration, and the asylum and temporary protection system largely achieves a high degree of alignment with the legal *acquis* of the European Union. Continuous monitoring of improvements in EU legislation and aligning the regulations of the Republic of Serbia with the adopted standards is an ongoing process, as evidenced by the fact that the Republic of Serbia is taking measures to adopt the Law on Amendments to the Law on Border Control (based on an expert assessment of alignment, primarily with the Regulation on the European Border and Coast Guard Agency and the Schengen Border Code) and to harmonize regulations and mechanisms in accordance with the new EU Pact on Asylum and Migration

Strengthening institutional capacity: training of the police, border services, and judicial authorities. Continuous measures are being taken to improve the quantity and quality of human resources for border control, combating cross-border crime, monitoring the movement and stay of foreigners, and asylum tasks, and the training programs are fully aligned with the training programs of the European Border and Coast Guard Agency. In addition to regular activities conducted at the Basic Police Training Center and the Secondary School of Interior, targeted training is continuously carried out to maintain and enhance the knowledge and skills of police officers responsible for border control and state border security.

Modernization of borders: introduction of digital systems for entry/exit recording (EES), biometric controls, and interoperable databases.

Through the continuous enhancement of equipment for border police and other integrated border management actors, activities are continuously conducted to improve the Border Control Information System and its connectivity with relevant databases institutionally at the level of the Ministry of Interior of the Republic of Serbia, and inter-institutionally in terms of exchanging relevant data with other state authorities of the Republic of Serbia. Additionally, continuous activities are carried out for the integration of the FIELDS system into the Ministry of Interior's operational system, as well as connecting the institutions of the Republic of Serbia to the EURODAC system and the EUROSUR network, and preparing databases for future integration into the Schengen Information System (SIS).

Fight against crime and migration: strengthening cooperation with EUROPOL and FRONTEX. The fight against all forms of crime and migration has been significantly improved, and activities are constantly being undertaken to further enhance the efficiency of all authorities in this fight, primarily through adequate equipment and continuous staff training. Cooperation with EUROPOL and the European Border and Coast Guard Agency is at a very high level and takes place continuously, without delays or unresolved issues.

Transparent monitoring: annual reports, success indicators, and evaluation of implemented measures. Measures for self-assessment of implementation and achieved European Union standards are carried out through all institutions responsible for implementing the Action Plan, and reports on progress in all key elements of the Action Plan are continuously submitted to the competent European Union institutions.

The European Union significantly contributes to the fulfilment of the goals of the Action Plan for the accession of the Republic of Serbia to the Schengen Area through financial support, support in improving the equipment of the border police, and support in enhancing the knowledge and skills of police officers responsible for border control. Additionally, this process is significantly supported by other international organizations and countries through bilateral cooperation.

Currently, several projects are being carried out for the needs of the Border Police of the Republic of Serbia, aimed at improving human and material capacities in several areas:

a) Service Contract "EU Technical Assistance for Supporting the Alignment of the Legislation.

b) Procedures, and Standards of the Republic of Serbia with EU *acquis* in the Area of Schengen and Integrated Border Management" Individual Measure 2023.

c) European Union Support for Migration Management in Serbia - Strengthening Migration Management and Border Control" within the Individual Measure for Improving Migration Flow Management in the Western Balkans.

d) "European Union Support for Migration Management in Serbia - Promoting a Positive Narrative on Refugees and Migrants, Strengthening Social Cohesion, and Improving Migration and Asylum Policies" within the Individual Measure for Improving Migration Flow Management in the Western Balkans.

e) Individual measure to strengthen migration management capacity. IPA 2023

f) "EU support to strengthen the return management system in Serbia", Individual measure 2023

g) Individual measure 2024 – "Strengthening the irregular migration management system and combating organized crime in the Western Balkans"

h) "Safer Climate in the Romanian-Serbian Border Area," Interreg IPA Romania-Serbia Program

i) "Capacity Building Instrument for Readmission in the Western Balkans," WBCAP

j) "Regional Support for Managing Sensitive Migration in the Western Balkans," Phase 3

k) The regional program "EU Support to Regional Security in the Western Balkans," multi-beneficiary IPA 2021-2022, implements the IPA III project "EU Regional Support to Strengthening Border Security in the Western Balkans," which relates to support for border security (area 3).

l) "EU Support to Strengthening the Fight Against Migrant Smuggling and Human Trafficking in the Western Balkans" EU4FAST

m) Strengthening Migration Management and Asylum Systems in Serbia – Policy Improvement, Rights Protection" – this project represents Swiss support for migration management in the period 2025-2028 within the Swiss-Serbian Migration Partnership, and is financed by the State Secretariat for Migration (SEM) under the Swiss Federal Department of Justice and Police.

In 2025, the project 'EU Support for Efficient Border Management,' IPA 2022, was completed, whose general objective was to strengthen the institutional and human capacities of relevant institutions for integrated border management in order to meet the accession criteria and implement Chapter 24.

Project purpose: Strengthening the institutional capacities of the Ministry of Interior, the Ministry of Agriculture, Forestry and Water Management with the Plant Protection Directorate and the Department for Border Phytosanitary Inspection, the Veterinary Administration and the Department for Border Veterinary Inspection, as well as the Customs Administration within the Ministry of Finance for the implementation of measures foreseen by the Strategy and Action Plan for Integrated Border Management.

Key results:

Result 1: Improvement of the capacity of financial services within the institutions of the integrated border management system actors for the development, planning, and monitoring of budget execution for the implementation of measures within the Action Plan

Result 2: Enhanced working procedures of the Plant Protection Directorate and the Border Phytosanitary Inspection Department, the Veterinary Directorate and the Border Veterinary Inspection Department, and the Customs Administration of the Ministry of Finance at border crossings

Result 3: Capacity building of employees in the Ministry of Interior (including representatives of the Criminal Police Directorate, the Internal Control Sector, the Department for Education and Training, and the Human Resources Sector), the Ministry of Agriculture, Forestry and Water Management, and the Ministry of Finance - Customs Administration (including representatives of the Human Resources and General Affairs Department)

Result 4: Prepared and implemented communication and visibility activities related to the Action Plan for Integrated Border Management and the Integrated Border Management Sector Reform Contract.

Result 5: The accuracy of IT processes in planning, monitoring, and executing the budget in the Material-Financial Affairs Sector/Logistics Sector of the Ministry of Interior, the Ministry of Agriculture, Forestry and Water Management, and the Customs Administration of the Ministry of Finance has been improved, as well as the interconnectedness between institutions within the integrated border management system.

Result 6: Technical support has been provided to coordination mechanisms.

Projects in the preparation

1. Individual measure 2024 - "Strengthening the management system for irregular migration and combating organized crime in the Western Balkans."
2. IPA 2025-2027 - for 2025, the planned focus is on combating organized, serious, and high-tech crime (equipment and services); for 2026, combating environmental crime (equipment and services); and for 2027, API/PNR and K9 (equipment, construction, and services). The programming of IPA 2025 has been completed, and IPA 2026 has started. The signing of the Financing Agreement between the Republic of Serbia and the European Commission regarding the Multiannual Action in favor of the Republic

of Serbia for the period 2025-2027 is expected, as well as the start of the implementation of IPA 2025.

3. Within the framework of the project entitled EU Support to Migration Management in Serbia - Strengthening Migration Management and Border Control, financed from EU funds, the final beneficiary of which is the Border Police Directorate, the following equipment was purchased in the period 2023-2025 in order to increase the efficiency of the border police in monitoring the state border and when conducting border checks:

The answer refers to Area 4 entitled Action Plan for the Entry of the Republic of Serbia into the Schengen Area, Chapter 1: Border Management:

State Border Surveillance, Objective 1, Measure 3: Improving the State Border Surveillance System, Activity:

a) 1.1.3.1 "Improvement of technical systems for state border surveillance that ensure constant surveillance and protection of the state border". Within the framework of the project, 10 handheld devices for checking the validity of documents (ID checkers) were purchased. A procurement plan was also drawn up, the implementation of which is expected by the end of October 2026, as follows: 140 pieces of perimeter cameras and 40 pieces of protective suits for ATV drivers;

State Border Surveillance, Objective 1, Measure 4: Ensuring the necessary capacities for 24/7 response, activity:

b) 1.1.4.1 "Expand TETRA signal coverage in the operational area". Within the same project, the procurement of 10 relays - base stations for full TETRA signal coverage along the border of Serbia and Bulgaria is planned.

Border checks, Objective 2, Measure 4: Providing the minimum necessary modern technical equipment for conducting border checks, activities:

c) 1.2.4.4 Within the framework of the project, 5 devices for detecting forged travel and other documents were purchased . Also, by October 2026, the following are planned to be purchased: 6 devices for rapid heart detection in freight vehicles, 200 fixed travel document readers for efficient detection of document misuse at border crossings, 100 pieces of uninterruptible power supply devices for border checks at border crossings (UPS up to 1500 VA) and 100 pieces of handheld devices for rapid document checking and detection of forgeries;ž

d) 1.2.4.10 The project plans to purchase and install video surveillance and continue the establishment of monitoring centers in 4 Regional Border Police Centers, purchase video surveillance equipment at border crossings and enable the smooth functioning of border checks - 60 sets (computers, monitors and devices for uninterrupted power supply of computers for video surveillance - UPS 2500 VA, suitable for video surveillance), purchase of license plate recognition systems at 18 border crossings to effectively prevent human smuggling and other forms of cross-border crime .

International and inter-agency cooperation, Objective 1, Measure 1, activity:

a) 1.4.1.1 The Integrated Border Management Strategy of the Republic of Serbia and the accompanying Action Plan are being implemented continuously when it comes to Area 2 entitled "Suppression of Cross-Border Crime".Area 4 Action Plan for the Entry of the Republic of Serbia into the Schengen Area, Chapter 2: Return and Readmission, Objective 1, Measure 1, activity:

b) 2.1.1.5. Within the same project, 23 vans specialized for the transport of irregular migrants were purchased and deployed: 15 within the Border Police Directorate and 8 in police departments located on the most frequent entry/exit and transit routes for irregular migrants.

Chapter 2: Return and readmission, Measure 2, activity:

1. Within the framework of the project, the improvement of accommodation conditions in all three shelters for foreigners under the jurisdiction of the Border Police Directorate continued, for which approximately 1.8 million euros were allocated. Works in the shelters for foreigners in Dimitrovgrad and Plandište were completed during 2025, while works in the shelter for foreigners in Padinska Skela are ongoing.

- Please inform about Serbia's continued effort to carry out border control and surveillance, and efforts in detecting and preventing the smuggling of migrants, as well as combating trafficking of weapons, drugs and other illicit goods. Please provide an overview of the current organisational structure of police department (number of officers, functions, etc.).

Ministry of Interior

Border control and surveillance

Procurement of modern equipment

The Border Police Directorate continuously undertakes activities aimed at increasing efficiency in combating all forms of cross-border crime and irregular migration.

In this regard, it procures modern equipment and conducts constant training of police officers in order to improve their knowledge and skills in detecting criminal acts and misdemeanours during border checks and state border surveillance.

For purchasing equipment, the Border Police Directorate continues to receive the greatest financial support from the European Union, which is implementing several projects that are important for improving work on border checks and state border surveillance (vehicles, equipment for detecting counterfeits, equipment for recognizing license plates at border crossings, vehicles equipped with long-range thermal imaging cameras, drones, devices for registering persons - irregular migrants, etc.). Also, support in equipment on a bilateral basis is significant, also from EU member states and Frontex (similar equipment).

Efforts in detecting and preventing the smuggling of migrants, as well as combating the trafficking of weapons, drugs, and other illicit goods.

Strategic framework

To combat all forms of cross-border crime and irregular migration, the Border Police Directorate is guided by several strategic documents:

– Integrated Border Management Strategy in the Republic of Serbia for the period 2022-2027. This document, together with the accompanying Action Plan, represents the basis for the work of the Border Police Directorate for planning measures at the strategic level in order to combat all forms of cross-border crime (Area 2 of the Action Plan) and irregular migration (Areas 6 and 8). At the national level, this document obliges the

Border Police Directorate, as well as the Criminal Police Directorate and other actors in the integrated border management system (police departments, customs, etc.), to jointly undertake official actions to prevent, detect, and prosecute criminal offenses and violations at border checks and state border surveillance

During 2025, the Border Police Directorate detected 2,858 criminal offenses, which is 5% more than in 2024. Of the above number:

- In 78 cases, the criminal act of human smuggling was detected (in 2024, 207 of these criminal acts were detected)
- In 236 cases, 44 firearms, 35 gas weapons, 44 air weapons, and 12,650 pieces of ammunition were found (in 2024, in 206 cases, 31 firearms, 23 gas weapons, 11 air weapons, and 6,574 pieces of ammunition were found).
- In 1,064 cases, a total of 205 kg of various types of narcotic drugs were discovered (in 2024, 380 kg of narcotic drugs were discovered in 1,293 cases).
- This document also obliges the Border Police Directorate to participate in international operational actions within the EMPACT platform and with other international partners. In this regard, during 2025, the Border Police Directorate took part in 15 actions within the EMPACT platform and 4 at the invitation of other international police organizations (Interpol (2), Railpol, Aquapol), intending to detect various types of criminal acts.
- The Police Strategic Plan for the period 2022-2025 contains 8 priorities, one of which is under the jurisdiction of the Border Police Directorate, entitled "Suppression of Irregular Migration". Within the framework of this priority, statistical and operational data are collected from all Regional Border Police Centers, all police departments (27), and the Criminal Police Directorate related to the prevention and suppression of irregular migration. The data is consolidated every month and used for making decisions at the strategic level regarding the type and scope of measures to be taken, the organizational units to be engaged, as well as the places and periods of priority engagement in relation to migratory pressure at the borders with the appropriate level of management and decision-making.
- Also, within this priority, operational data related to the suppression of irregular migration is collected and exchanged through Europol channels with other countries at the international level in order to initiate joint international investigations.
- The Working Group of the Police Directorate was formed in November 2023 to counter all security challenges associated with the massive influx of irregular migrants into the territory of the Republic of Serbia. The Working Group was formed by a decision of the Minister of Interior, without a limited duration (as long as the need exists), and is centrally managed by the Police Directorate. The task of the Working Group is primarily to monitor developments on the entry-exit routes - the borders of Serbia and neighbouring countries and to take planned measures, on the ground, to prevent and suppress not only illegal border crossings, but also all other forms of crime that accompany irregular migration: murders and injuries among the migrant population, drug abuse, illegal trafficking, carrying and use of firearms, etc.
- Until 2025, the Working Group continued with measures aimed at maintaining a favourable security and migration situation on the Western Balkan route leading through the territory of the Republic of Serbia. In this regard, in October 2025, the European Commission approved a grant of EUR 1 million under the title "EU Support to the Fight against Migrant Smuggling in the Republic of Serbia, as a form of two-year

support with co-financing for the implementation of police operations on the ground, primarily on state border surveillance."

In the Department for Suppression of Cross-Border Crime and Irregular Migration at the headquarters of the Border Police Directorate, 37 positions have been systematized (6 management positions, 3 positions for work coordination, and 28 positions - criminal inspectors for the suppression of cross-border crime), while 32 have been filled.

The listed positions follow the line of work in the Regional Border Police Centres (8) in which the Departments for Suppression of Cross-Border Crime and Irregular Migration are systematized, in which a total of 71 positions are systematized (8 management and 63 positions - criminal inspectors for the suppression of cross-border crime), of which 62 have been filled.

- Please provide an update about the number of persons intercepted at the border in 2025 and about actions undertaken to improve the track record of investigations and prosecutions for migrant smuggling and trafficking in human beings, in particular for the purpose of labour exploitation.

Ministry of Interior

The answer refers to part of the question: actions undertaken to improve the track record of investigations and prosecutions for migrant smuggling and trafficking in human beings, in particular for labour exploitation.

Migrant smuggling

In 2025, the number of irregular migrants attempting to illegally enter the Republic of Serbia decreased by around 20% compared to 2024.

Also, the number of those registered in reception centres for irregular migrants under the jurisdiction of the Commissariat for Refugees and Migration of the Republic of Serbia (migrants who entered Serbia illegally, those caught in an illegal attempt to leave Serbia, those who were returned under readmission agreements from neighbouring countries or "escorted" by the Hungarian police through transit gates on the protective fence between Hungary and Serbia in accordance with Hungarian national legislation (which does not constitute a readmission procedure) has decreased by about 50%.

Also, the number of migrants who expressed their intention to seek asylum in the Republic of Serbia has also decreased by around 26% compared to 2024.

In this regard, the results of combating the smuggling of irregular migrants have significantly decreased in 2025 compared to the previous two years. 2023 - 317 reports, 2024 - 327 reports, 2025 - 137 reports (reports for the criminal offense of Illegal Crossing of the State Border and Smuggling of People under Article 350 of the Criminal Code).

The Border Police Directorate does not have the authority to conduct investigations and prosecute cases of smuggling of irregular migrants. It is exclusively within the competence of the criminal police (at the headquarters of the Police Directorate and police departments). In this regard, within the framework of its competence, the Border Police Directorate, while performing border control at border crossings and monitoring the state border during 2025, detected 78 criminal offenses related to smuggling of irregular migrants (57% of the total

number of detected criminal offenses), which were further processed by the Criminal Police Directorate in cooperation with the competent prosecutor's offices.

Also, the Border Police Directorate, through planned activities, continuously carries out controls of cargo vehicles at the entrance/exit of the country in order to prevent the smuggling of irregular migrants. In this regard, during 2025, 15 trucks were detected at the entrance to the country from the direction of North Macedonia, in which irregular migrants were detected, 25 were detected in the interior of the territory, while 115 trucks were detected at the exit from Serbia towards Croatia (a total of 155 trucks and 790 irregular migrants).

Through measures to control the movement and residence of foreigners in the territory of the city of Belgrade, which has been identified as the main crossroads where migrants arrive after illegally entering Serbia and then continue their journey to Hungary, Croatia, or Bosnia and Herzegovina, 60 addresses were discovered in 2025, where a total of 370 irregular migrants were found.

Also, through the activities of the Working Group formed at the level of the Police Directorate to resolve all security challenges associated with the massive influx of irregular migrants into Serbia, 9,480 irregular migrants who were found either in an illegal stay or attempting to illegally cross the state border were dealt with in 2025. Also, in 39 cases, 40 firearms and 1,160 pieces of ammunition for firearms were found, which are linked to criminal groups of irregular migrants who are involved in human smuggling on the territory of Serbia.

Human trafficking

On March 24, 2024, the Government of the Republic of Serbia adopted the Program for Combating Human Trafficking in the Republic of Serbia for the period 2024-2029, with the accompanying Action Plan for the period 2024-2026.

The aforementioned Program, through four Specific Objectives, elaborates on the measures that need to be taken to improve the efficiency of state bodies in combating human trafficking. The first specific objective includes measures to improve investigations and prosecution, and the third specific objective includes measures to prevent and detect various forms of exploitation, with an emphasis on labor exploitation. Various state bodies are recognized as actors, with an emphasis on the role of the Ministry of Interior, the Ministry of Justice, and the Ministry of Labour, Employment, Veterans, and Social Affairs.

Investigations and prosecutions involve specialization and training of police and prosecutors in dealing with cases of human trafficking, as well as training of inspectors from the Labour Inspectorate to detect victims of human trafficking for labour exploitation.

In this regard, during 2025, the police, in cooperation with the competent prosecutor's offices, filed 19 criminal charges for the criminal offense of Human Trafficking under Article 388 of the Criminal Code (23 criminal charges were filed in 2024). Of the above number, two were filed due to suspicion of labour exploitation of foreign workers - one Indian citizen and one Uzbek citizen.

The Labour Inspectorate controls the implementation of the Law on the Employment of Foreigners.

In 2024, the Labor Inspectorate carried out 289 inspections, during which a total of 7,482 foreign workers were found at work. In 2025, it carried out 199 inspections, during which a total of 1,886 foreign citizens were found at work. When carrying out inspections in which

foreign citizens were found employed, special attention was paid to the existence of possible indicators of human trafficking and labor exploitation.

During 2024/2025, the Labour Inspectorate did not record any cases that would possibly indicate human trafficking for labour exploitation.

Supreme Public Prosecution Office

In order to improve track records of investigation and prosecution for migrant smuggling and trafficking in human beings during 2025, public prosecutors attended various seminars, conferences and workshops on trafficking in human beings and smuggling of persons:

- Group 484, Workshop on the risks of using high technology in migrant smuggling cases, 25-27.02.2025, Sarajevo, Bosnia and Herzegovina
- MARRI Center, Regional Conference on Gender-Based Violence in the Context of Migration, 05-06.03.2025, Skopje, S. Macedonia
- Group 484, Regional Conference on the Risks of Using High Technology in Migrant Smuggling Cases, 27.06.2025, Sarajevo, Bosnia and Herzegovina
- CEPOL Online Seminar, "Smuggling of Migrants in the Digital domain", 30.06.2025
- CEPOL, online seminar "Investigations of migrant smuggling", 07-18.07.2025
- European Judicial Network, regional meeting on migrant smuggling, 01-03.10.2025, Balatonszemes, Hungary

Part of the list is presented within the response for 8.2.

13.6. Implementation of the national anti-corruption strategy at the borders

- Please provide an update about the implementation of dedicated anti-corruption plans at the borders and what results have been achieved.

Ministry of Interior

In March 2023, the analysis of the risk of corruption in the Border Police Directorate was completed, to which the Internal Control Sector submitted a Report to implement the proposed preventive measures.

The Border Police Directorate submitted a Report on the measures taken to the Internal Control Sector in September 2023.

Pursuant to the Instructions on the Methodology for Conducting Corruption Risk Analysis in the Ministry of Interior ("Official Gazette of the Republic of Serbia", No. 94/2018 of 07.12.2018), if, while performing tasks within its scope of work, the Internal Control Sector notices new corruption risks for a certain organizational unit or job position in the Ministry of Interir or notices that preventive measures have not contributed to reducing or eliminating the risk, the Internal Control Sector may initiate the conduct of a new corruption risk analysis or a risk audit in the controlled organizational unit of the Ministry.

In 2025, as part of the European Union project "Support to Effective Border Management - IPA 2016," a workshop titled "Anti-Corruption Preventive Mechanisms in the Integrated

Border Management System" was held from March 17 to March 18, 2025, in Vrnjačka Banja.

The workshop was attended by 20 police officers from the Border Police Directorate.

Throughout 2025, the Border Police Directorate conducted 648 control activities aimed at preventing corrupt behaviour among its officers. As a result, 10 criminal charges were filed against Border Police officers for incidents involving corruption.

Additionally, 4 disciplinary proceedings were initiated due to serious misconduct related to corruption-related events.

14. Visa policy alignment – Further steps in alignment and operational measures to screen visa free arrivals, follow-up to the eighth Report under the Visa Suspension Mechanism

- Please inform about how the recommendations of the Eighth Visa Suspension Mechanism Report have been followed up.

Ministry of Interior

Visa issuance procedures - In 2025, we clearly demonstrated our commitment to rigorous assessment, with over 60% of all visa applications for entry into the Republic of Serbia being rejected. Specifically, out of 113,861 applications, 66,836 were denied, predominantly from Bangladesh, Pakistan, Nepal, and India—nations recognized as high migration risk. This data reflects our proactive approach to managing visa applications effectively.

Visa policy alignment - Serbia has reduced the number of visa-free agreements with countries subject to the EU visa regime from 16 to 12, and this trend will continue in 2026.

Implementation of readmission obligations - Serbia is fully implementing the third-country nationals' clause of the EU–Serbia Readmission Agreement, particularly in cases where third-country nationals transited through Serbian territory and where such transit is demonstrably documented.

Serbia is strengthening its capacities and intensifying its efforts. Significant efforts are being invested in reinforcing anti–human trafficking policies and enhancing operational capacities in these areas.

Citizenship practices - explained in detail in this document

Ministry of Foreign Affairs

Eight report under the Visa Suspension Mechanism - Serbia has taken steps to address the Commission's previous recommendations. However, further progress is required in several key areas, particularly with regard to migration, visa policy, and acquisition of citizenship. The following issues need to be addressed:

a) *Visa policy alignment: Serbia must further align its visa policy with the EU list of visa required third countries, with a particular focus on those countries whose nationals pose a heightened risk of illegal migration or security threats to the EU. Serbia should also align its visa procedures with Schengen standards, in particular by introducing the collection of biometric data (including a digital photo and fingerprints) as part of the examination of visa demands.* Pending full alignment, Serbia should continue

to strengthen screening measures for visa-exempt third-country nationals, especially from high-risk countries.

The Republic of Serbia continues to pursue alignment of its visa policy with that of the European Union**,** as part of its ongoing efforts within the EU accession process, specifically under Chapter 24 – "Justice, Freedom and Security." Serbia remains committed to harmonizing its visa regime with the EU's visa regime towards third countries, in line with the obligations undertaken in the accession negotiations.

In the forthcoming period, Republic of Serbia will continue to reassess bilateral agreements and governmental decisions that liberalize visa regimes, where necessary, to bring Serbia's visa policy closer to that of the EU**.** These efforts support effective migration and border management, address security risks, and demonstrate Serbia's commitment to gradual, sustainable, and fully aligned visa policy with the European Union.

Serbia is actively working on developing a new Visa Policy Roadmap, which will include a thorough assessment of alignment with Schengen standards, including the potential introduction of biometric data collection (such as digital photographs and fingerprints) as part of visa application procedures.

The drafting of this plan is being carried out within the framework of the Technical Assistance project "EU Support for Schengen, IBM and Visa Policy"**,** with the process expected to take place in 2026**.** The project will incorporate the key elements of the needs assessment, ensuring that future visa procedures are designed to meet EU and Schengen requirements while supporting effective and secure border management.

b) Visa issuance procedures: Serbia must enhance the screening of visa applications submitted by nationals of countries considered to present illegal migration or security risks. In parallel, the rules governing the issuance of visas to such nationals should be tightened to ensure greater control and consistency with EU standards.

Serbia has already implemented enhanced screening measures for visa applications submitted by nationals of countries considered to present higher risks of illegal migration or security concerns, and it will continue to further tighten these procedures**.**

In addition to harmonizing the list of third countries whose nationals require a visa with EU standards, Serbia has introduced stricter measures for processing visa applications**,** including more detailed verification of travel documents, rigorous risk assessment prior to visa issuance and enhanced security screenings through international cooperation. Special attention is given to applications from the Middle East and certain parts of Africa**,** from where the highest migratory pressures are recorded. The effectiveness of these measures is reflected in the ratio between applications submitted and visas granted**;** for example, in 2025, out of 471 applications from Afghanistan only 91 visas were issued, from 528 applications from Syria 216 visas were issued, from approximately 1,620 applications from Nigeria slightly more than 550 visas were issued, and from 442 applications from Cameroon around 100 visas were issued.

These procedures further reduce the possibility of misuse, particularly for individuals attempting to use Serbia as a transit point toward EU Member States, and are aimed at preventing irregular migration, strengthening entry controls, and maintaining security**,** while fully respecting international standards.

Serbia remains committed to continuously reviewing and further tightening its visa issuance procedures to ensure ongoing alignment with EU standards and effective border management.

c) Implementation of readmission obligations: Serbia must fully implement the third-country nationals' clause of the EU–Serbia Readmission Agreement, particularly in cases where third-country nationals transited through Serbian territory and such transit is demonstrably documented.
d) Citizenship practices: Serbia must refrain from granting citizenship under accelerated or 15 simplified procedures to nationals of countries that pose illegal migration or security risks to the EU. Moreover, adequate and thorough security screening should be ensured for all applicants, including under the ordinary naturalisation procedure.

- Please inform about Serbia's further plans of alignment with the EU's visa policy regarding visa-required third countries in the EU.

Ministry of Foreign Affairs

The Republic of Serbia continues to pursue alignment of its visa policy with that of the European Union, as part of its ongoing efforts within the EU accession process, specifically under Chapter 24 – "Justice, Freedom and Security." Serbia remains committed to harmonizing its visa regime with the EU's visa regime towards third countries, in line with the obligations undertaken in the accession negotiations.

In recent years, Serbia has taken several concrete steps to align its visa regime with Schengen rules, including the gradual termination of visa-free regimes for countries considered high-risk by the EU in terms of migration. In the latest wave, in December 2024, the visa-free regime was abolished for citizens of Qatar, Kuwait, Oman, and Mongolia. In addition to updating the list of third countries whose nationals require a visa, Serbia is introducing stricter measures for processing visa applications, such as more detailed verification of travel documents, rigorous risk assessment prior to issuing visas, enhanced security screenings through international cooperation.

Serbian authorities continuously monitor and assess the effects and sustainability of visa-free regimes through established mechanisms, such as migration profiling and contingency plans in case of irregular migration flows. These assessments take into account migration pressures, security considerations, and data from relevant international bodies.

Moving forward, the Republic of Serbia will continue to reassess bilateral agreements and governmental decisions that liberalize visa regimes, where necessary, to bring Serbia's visa policy closer to that of the EU. These efforts support effective migration and border management, address security risks, and demonstrate Serbia's commitment to gradual, sustainable, and fully aligned visa policy with the European Union.

- Please inform about Serbia's measures undertaken to better screen third country nationals having visa free access to Serbia and to engage with third countries of origin and airlines.

Ministry of Interior

The Ministry of the Interior continuously monitors the implementation of the visa-free regime and conducts enhanced controls to prevent its abuse. Based on an analysis of migration flows and data on irregular border crossings, two countries with a visa-free

regime have been identified as sources of citizens attempting illegal crossings into neighbouring EU states: the Republic of Turkey and China. The risk is significantly higher for citizens of the Republic of Turkey.

In most cases, Turkish citizens attempt to illegally cross the state border from Serbia to Hungary. This is evidenced by the number of Turkish citizens who are returned from Hungary to Serbia through transit gates on the protective fence along the Serbian-Hungarian border. In 2025, a total of 728 Turkish citizens, along with 59 citizens of China, were returned to Serbia from Hungary in this manner.

Additionally, the Ministry of the Interior also monitors citizens of Turkey and China who return to Serbia from other neighbouring EU states based on readmission agreements. In 2025, 35 Turkish citizens and 69 Chinese citizens were returned to Serbia through these agreements.

It has been observed that Turkish citizens who are caught attempting to illegally cross the state border, as well as those returned by neighbouring border authorities, most often enter Serbia legally, typically via air border crossings or by land from Bosnia and Herzegovina and Montenegro.

To prevent abuse of the visa-free regime, 1,438 citizens of the Republic of Turkey were refused entry to the Republic of Serbia in 2025. The highest number of refusals occurred at border crossings to Bosnia and Herzegovina, followed by Montenegro, and at the Nikola Tesla Airport in Belgrade. The most common reason for these refusals was the unclear purpose of the intended stay. For comparison, in 2024, 2,355 citizens of Turkey were denied entry into Serbia.

In contrast, citizens of China experienced refusals of entry much less frequently. Under a bilateral agreement, Chinese citizens can enter and stay in Serbia without a visa for up to 30 days. This is different from Turkish citizens, who can reside in Serbia for up to 90 days within a 180-day period.

During 2025, 152 Chinese citizens were detained for illegally crossing the state border and were placed in detention centres for foreigners in preparation for their return to their country of origin. All detained Chinese citizens were either returned to China or to the country where they resided prior to entering Serbia.

Additionally, in 2025, the Ministry of the Interior issued return decisions, allowing 428 Turkish citizens and 270 Chinese citizens a deadline of 7 to 30 days to leave Serbia. The Ministry of the Interior also issued 747 decisions revoking the stay of Turkish citizens and 427 decisions for Chinese citizens, as the legal conditions for revoking short-term stays were met. These decisions mean that individuals' entry into Serbia is prohibited for a specific period.

E-visa/ e-travel authorisation

- Could you please inform on whether the new Digital Travel Authorisation is a visa in a digital form and, if so, has Serbia considered referring to it as digital visa in spite of ICAO recommendations?

Ministry of Foreign Affairs

The Digital Travel Authorisation (DTA) represents a change in the way visas are issued, rather than a change to Serbia's visa policy. Instead of receiving a visa as a physical sticker in their passport, foreign nationals may now be issued a digital document prior to travel. This update

relates solely to the format of the document and does not affect the procedures for submitting applications, assessing requests, or deciding on visa eligibility.

The DTA was developed in cooperation with the International Civil Aviation Organization (ICAO) and in line with its relevant technical guidance. Before the system was put into use, ICAO confirmed that the Digital Travel Authorization complies with the applicable standards.

As a result, other countries are able to verify that a DTA has been issued by the Republic of Serbia, in the same way they verify the authenticity of biometric passports. The document includes two QR codes and digital seal of MFA that support secure and reliable verification.

- If the requirements are exactly the same and security checks identical, could you please inform on why Serbia is making a difference between third countries that can benefit from a DTA and others?

Ministry of Foreign Affairs

While the requirements and security checks are identical for all visa applicants, the distinction between third countries with regard to access to the Digital Travel Authorization (DTA) is based on a phased and risk-based approach to implementation, rather than on differing standards or procedures.

Currently, holders of national passports from 42 countries are, when applying for a visa, given the option to choose between receiving a visa sticker or a Digital Travel Authorization. Applications submitted under the DTA option are assessed by the Ministry of Foreign Affairs (MFA), which may allow the procedure to continue through the DTA system or, where appropriate, refer the applicant to the issuance of a visa sticker. The determination of which nationals are eligible to apply for a DTA is guided primarily by an assessment of migratory risk. In this context, regular consultations are conducted with the Ministry of Interior, and reference is made to relevant data provided by EU bodies—most notably the Frontex list of illegal border crossings into the EU disaggregated by nationality. The DTA system is therefore designed and continuously monitored to ensure that its implementation does not introduce any additional migratory risk.

The current list of countries eligible to opt for a DTA reflects Serbia's efforts to gradually introduce the system, taking into account migration trends, security considerations, and international obligations. It is also worth noting that a significant number of these countries are included in the Schengen "white list", which supports Serbia's broader objective of aligning its visa policy with that of the European Union, particularly in situations where reciprocal visa-free arrangements for Serbian nationals are not yet in place.

Accordingly, the differentiation does not affect the substance of visa requirements or security screening, but serves as a practical and controlled framework for the implementation of the Digital Travel Authorisation system.

- Could you please inform on whether the process for the issuance of DTAs implies the digitalisation of the visa application, including electronic submission of supporting

documents, compared to the process for the issuance of a paper visa sticker? If so, how is the new digital application process designed to detect forged supporting documents?

Ministry of Foreign Affairs

The application for a Digital Travel Authorisation (DTA) can be submitted either electronically or through a Serbian diplomatic-consular mission abroad.

Since DTAs are issued for short-term visits, the invitation letter constitutes the central supporting document. The Ministry of Interior of the Republic of Serbia conducts a thorough verification of the natural or legal person who issued the invitation, including checks of their identity, legal status, and credibility. In accordance with the Law on Foreigners, the inviter is legally responsible for covering the costs of the applicant's stay and any potential forced return. This responsibility is formally confirmed and documented during an in-person verification interview as part of the Ministry's comprehensive assessment procedure.

In cases where there is any suspicion regarding other supporting documents submitted with the application, the Ministry of Foreign Affairs may redirect the request to the regular visa procedure through the diplomatic-consular mission. This ensures that all supporting documents are properly verified and maintains the integrity of the visa issuance process.

15. Miscellaneous and any other business (AOB)

16. Conclusions/Wrap up