

| Action Plan for the Implementation of the Resolution on the Prevention of Corruption |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                              |                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                  |                                                                                                                                                               |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                |
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| AREA                                                                                 | GOAL                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | RISK                                                                                                                                                         | RISK LIMITATION MEASURE                                                                                                                                                                                                                 | ACTIVITY TO LIMIT RISK                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | MEASURE HOLDER                                                                                   | PARTICIPANTS                                                                                                                                                  | DEADLINE FOR THE IMPLEMENTATION OF THE ACTIVITY (indicated as a year or "permanent action") | PERFORMANCE MEASUREMENT INDICATORS                                                                                                                                                                                                                                                                                                                             |
| GENERAL                                                                              | OBJECTIVE 1: Anyone must report any suspicion of corrupt behavior (in the broadest sense of the concept of corruption) to the competent authorities.<br><br>OBJECTIVE 2: In order to effectively prevent corruption, the entire society must provide mechanisms for raising awareness and strengthening the integrity of residents, employees in the private sector, civil servants and officials. The public and private sectors must co-create an environment that encourages the responsible behavior of all residents, not only the public sector in the performance of public tasks.<br>Also linked to objective 76 (EDUCATION)" | Integrity is not recognized as a value, which increases the risk of violations, greater tolerance for violations, insufficient reporting of violations, etc. | Raising awareness among children and young people of the importance of integrity as a value and the importance of reporting violations.                                                                                                 | 1. Continuation and strengthening of cooperation with secondary schools in the framework of the subject Active citizenship (presentation of the CPC, the importance of integrity, the importance of reporting violations).<br>2. Continuation and strengthening of cooperation with various children's and youth media.<br>3. Continuation and strengthening of cooperation with non-governmental organizations that work with children and young people (joint events and initiatives).<br>4. Design and implementation of a multi-hour educational module for students (integrity, recognition and reporting of violations, case simulation).<br>5. Identification of target groups among students based on the probability of employment in the public sector and establishment of long-term cooperation with faculties.                            | CPC                                                                                              | 1. secondary schools<br>2. media<br>3. NGOs<br>4. Faculties<br>5. Faculty for Administration, faculties of law, Faculty of Criminal Justice and Security etc. | 1st - 3rd permanent measure<br>4. 2026<br>5. 2026                                           | 1. Number of visiting schools.<br>2. The number of media with which the CPC has long-term cooperation.<br>3. Number of NGOs with which CPC has long-term cooperation.<br>4. Designed module, number of implementations of the module, number of participants.<br>5. Number of faculties with which CPC has established long-term cooperation.                  |
|                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                              | Inclusion of programs for strengthening integrity in the curricula of kindergartens and schools and strengthening integrity among teachers.                                                                                             | 1. Completion of a development task to integrate integrity into curricula.<br>2. Formation of grounds for continuation of activities after the development task has been completed.<br>3. Strengthening cooperation with pedagogical faculties and upgrading their integrity-themed programs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1. in 2. National Education Institute<br>3. CPC                                                  | 1. in 2. Ministry of Education<br>3. CPC, Ministry of Education                                                                                               | 1. - 3. 2030                                                                                | 1. Completed development task.<br>2. Designed attachments, upgraded curricula.<br>3. Upgraded programs at the faculties of education.                                                                                                                                                                                                                          |
|                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                              | Raising awareness among adults on the importance of integrity as a value and the importance of reporting violations.                                                                                                                    | 1. Continuation and upgrade of the "Integrity Ambassadors" project.<br>2. Establishing long-term cooperation with various media (importance of integrity, importance of reporting violations).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | CPC                                                                                              |                                                                                                                                                               | 1. and 2. continuous measure                                                                | 1. Annual upgrade of the Integrity Ambassador project.<br>2. The number of media with which the CPC has long-term cooperation.                                                                                                                                                                                                                                 |
|                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                              | Raising awareness on the importance of integrity as a value and the importance of reporting violations in the business sector.                                                                                                          | 1. Continuation and strengthening of cooperation with various economic associations with the aim of strengthening integrity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | CPC                                                                                              | Slovene Sovereign Holding, Chamber of Commerce, Slovenian Business Club, Chamber of Craft                                                                     | 1. continuous measure                                                                       | New programs of cooperation.                                                                                                                                                                                                                                                                                                                                   |
|                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Lack of knowledge on integrity increases the risk of violations of integrity of officials and civil servants.                                                | Establishing a model of initial and periodic training for officials.                                                                                                                                                                    | 1. Preparation of training modules/programs with topics for strengthening integrity, intended for officials within three months after taking office and then regularly, periodically for two years.<br>2. Conducting training for officials.<br>3. E-training in the field of integrity and prevention of corruption for mayors, deputy mayors, municipal councilors no later than two months after the constitution of the municipal council, then every two years; and for members of supervisory boards no later than two months after appointment, and then every two years. The issued certificate on training is forwarded to the municipal administration.<br>4. Analysis of existing training programs with regard to the inclusion of topics from the field of strengthening integrity; inclusion of integrity topics in identified programs. | 1. CPC<br>2. CPC, integrity officers in bodies that have office holders<br>3. CPC, MPA<br>4. MPA | 1. MPA                                                                                                                                                        | 1. 2025<br>2. from 2026 onwards<br>3. 2027<br>4. 2026                                       | 1. Prepared module / training program.<br>2. Number of conducted trainings, number of newly appointed officials, participants vis-a-vis all newly appointed officials, number of officials at regular, periodic trainings.<br>3. Number of conducted trainings, number of certificates issued.<br>4. Performed analysis; inclusion of the topics in trainings. |
|                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                              | Regular training for civil servants in the field of integrity and prevention of corruption, no later than 3 months after employment, then regularly, periodically.                                                                      | 1. Designing a training module.<br>2. Start of implementation of the module as part of training at Administrative Academy, MPA.<br>3. Analysis of existing training programs with regard to the inclusion of topics from the field of strengthening integrity; inclusion of integrity topics in identified programs. Consideration of the need to provide a legal basis for the obligatory nature of the training.                                                                                                                                                                                                                                                                                                                                                                                                                                     | 1. Administration Academy - MPA, CPC<br>2. Administration Academy - MPA, CPC<br>3. MPA, CPC, MJ  |                                                                                                                                                               | 1. 2026<br>2. 2026<br>3. 2027 for legal basis and 2028 for training module                  | 1. Designed training module.<br>2. Number of conducted trainings, number of participating public officials in relation to the number of newly employed public officials.<br>3. Analysis made, in case of a decision on the law - the adopted law.                                                                                                              |
|                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                              | Strengthening the awareness of civil servants and officials about integrity and duties according to IPCA and according to the Convention on the Prevention of Bribery of Foreign Civil Servants in International Business Transactions. | 1. Strengthening the preventive role of the CPC (in general and in case of detected violations).<br>2. Targeted awareness raising campaigns in the event of a large number of detected violations (e.g. business restrictions, conflict of interests at the local level, etc.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 1. CPC<br>2. CPC                                                                                 |                                                                                                                                                               | 1. and 2. continuous measure                                                                | Number of awareness campaigns.                                                                                                                                                                                                                                                                                                                                 |
|                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                              | Strengthening organizational culture in public sector institutions and organizations.                                                                                                                                                   | Creation of a model for strengthening organizational integrity (through consultations with stakeholders – including from the private sector, defining the concept of integrity, its implementation in practice, performing internal and external communication, including through annual report and websites, performing a practical demonstration of various tools for strengthening organizational integrity, including various quality management models such as CAF).<br>2. Start of implementation of the model in pilot institutions.<br>3. Promotion of the model.                                                                                                                                                                                                                                                                              | CPC                                                                                              | MPA                                                                                                                                                           | 1. 2028<br>2. 2029<br>3. 2028                                                               | Designed model, at least 10 institutions involved, at least 3 different promotional activities.                                                                                                                                                                                                                                                                |
|                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                              |                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                  |                                                                                                                                                               |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                |
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| INTEGRITY-BASED CONDUCT  | OBJECTIVE 7: It is necessary to ensure consistent compliance with the legal provisions regarding the avoidance of conflicts of interest, restrictions on the simultaneous performance of activities or membership in addition to regular employment, and restrictions on business activities that apply to employees in the public sector.<br>Also related to objectives 50 (INSPECTIONS), 43 (LABOR AND SOCIAL AFFAIRS), 54 (LOCAL SELF-GOVERNMENT), 56 (ENVIRONMENT)                                                                                          | The IPCA provisions are insufficient in some areas (conflict of interests, gifts, "revolving door", lobbying, etc.) in view of the incidence of corruption in society, due to which corruption is not effectively addressed.                                                                       | Examining the reasons for the inadequate implementation of IPCA in practice and its upgrading according to perceived shortcomings.                                                                                                                                                                            | 1. Monitoring the implementation of legislation and identification of necessary changes (eg IPCA).<br>2. Analysis of current legislation, monitoring of trends abroad and at the EU level, preparation of changes to legislation if the need arises (e.g. reduction of legal loopholes and bypasses of laws, revolving door, etc.). Review of the relevant legislation from the point of view of the need for a special "revolving door" regulation at various state bodies (for example, as regulated for the Agency for the Protection of Competition in the Act on the Prevention of Restriction of Competition), preparation of appropriate changes to the legislation, if the need arises.                                                                                                                                                                                                                                                                                                                                | 1. MP, CPC, MPA<br>2. MPA, CPC                                                                                                                                                                                                         | 2. All ministries                                                                                                | 1. continuous measure<br>2. continuous measure | Number of analyses performed, number of changes in laws.                                                                                                                                                                                                                                                      |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Decision-makers or participants in public decision-making processes do not recognize private interests (their own or of persons connected to them) in public decision-making processes or do not avoid them. As a result, public decisions can be biased, or at least give the appearance of bias. | Strengthening the commitment of officials and other decision-makers to integrity, transparency and avoidance of conflicts of interest.                                                                                                                                                                        | 1. Forming a sample Declaration on integrity, transparency and familiarity with obligations under IPCA (the so-called "interest declaration" in combination with IPCA institutes).<br>2. Introduction of the use of the declaration in public decision-making processes (upon taking office, etc.) in accordance with the guidelines of the CPC. Publication of signed statements on the authorities' websites.<br>3. Raising awareness of the mechanism and importance of the statement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1. CPC<br>2. all state bodies<br>3. CPC                                                                                                                                                                                                |                                                                                                                  | 1. 2027<br>2. 2028<br>3. 2027                  | Formed declaration, number of signed declarations in relation to the number of all officials.                                                                                                                                                                                                                 |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | In the procedures in which they decide on the rights and obligations of natural and legal persons, the decision-makers do not recognize the risks of corruption, such as conflicts of interest, illicit influences, etc., or they do not act appropriately in relation to the perceived risks.     | Establishment of a mechanism for regular awareness-raising and counseling mechanism related to strengthening integrity and the IPCA and WPA institutes, including training for employees (also new employees), carried out by integrity officers at entities liable for the preparation of an integrity plan. | 1. Training for integrity officers at authorities where they are employed (i.e. train of trainers) on how to conduct training for civil servants and managers of that authority themselves.<br>2. In various ways (in the form of presentations, sharing of information and materials by e-mail, posting on an internal (electronic) bulletin board, etc.), integrity officers carry out regular periodical awareness raising of employees (including new hires) on topics related to strengthening integrity.<br>3. Integrity officers encourage employees in various ways (by presenting this option, a written invitation, posting on an internal (electronic) bulletin board) to turn to them for advice in case of ethical dilemmas and other questions in the field of strengthening integrity.<br>4. Integrity officers provide regular periodical trainings related to the strengthening of integrity for employees (including new employees), where they provide basic information about the IPCA and WPA institutes. | 1. CPC<br>2 - 4. integrity officers employed with bodies (e.g. ministries, inspectorates, centers for social work, employment office, Pension and Disability Insurance Institute, Healthcare Insurance Institute, municipalities etc.) |                                                                                                                  | 1. 2027<br>2. - 4. regular annual event        | Number of public officers' trainings, number of internal trainings at bodies.                                                                                                                                                                                                                                 |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                    | Strengthening oversight over the implementation of procedures at municipalities with regard to lobbying and avoiding conflicts of interest.                                                                                                                                                                   | 1. Planning ad hoc inspections of municipalities regarding lobbying and conflict of interest (one ad hoc inspection every 3 years at least).<br>2. Implementation of ad hoc controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | CPC                                                                                                                                                                                                                                    | municipalities                                                                                                   | 1. 2027<br>2. 2028                             | Number of inspections carried out, number of recommendations given and followed.                                                                                                                                                                                                                              |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Inspection and other supervisory bodies do not sufficiently recognize violations of IPCA institutes and do not refer cases to the CPC.                                                                                                                                                             | Increasing knowledge of the institutes and responsibilities of the CPC at inspection and other supervisory bodies.                                                                                                                                                                                            | 1. Raising awareness of inspection and other supervisory bodies through letters and training.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | CPC                                                                                                                                                                                                                                    | Inspectorates, National Review Commission for Reviewing Public Procurement Award Procedures, Court of Audit etc. | 1. 2028                                        | An increase in the number of cases referred by inspection and other supervisory authorities.                                                                                                                                                                                                                  |
|                          | OBJECTIVE 10: It is necessary to foster compliance for decisions of all public sector institutions, especially independent state bodies, and ensure the conditions for their effective operation.                                                                                                                                                                                                                                                                                                                                                               | Public sector institutions do not observe the decisions, recommendations, opinions of independent [state] bodies.                                                                                                                                                                                  | Fostering compliance with the decisions of independent state bodies.                                                                                                                                                                                                                                          | Pertaining to the Regulation on administrative operations, authorities are consistently reminded to comply with the obligation to respond in the event of a request from an independent state authority.<br>2. The institutions' supervisory bodies are familiarized up-to-date with the recommendations of independent bodies.<br>3. Analysis of the relevant sectoral legislation with regard to the obligation to comply with the recommendations of independent state bodies (e.g. IPCA, Ombudsman Act, Act on the Court of Auditors, etc.) and preparation of any necessary legal bases for mandatory response, compliance or justification for not complying with recommendations.                                                                                                                                                                                                                                                                                                                                       | 1. Independent state bodies<br>2. Independent state bodies<br>3. Independent state bodies and public sector bodies                                                                                                                     |                                                                                                                  | 1. - 3. 2027                                   | 1. Number of responses from bodies.<br>2. Integrity plans contain risks based on the decisions of independent state authorities. Supervisory authorities are aware of the recommendations of independent state authorities.<br>3. Analysis of regulations and preparation of possible changes to legislation. |
| WHISTLEBLOWER PROTECTION | OBJECTIVE 11: The protection of whistleblowers that report violations, including corruption and other illegalities and irregularities, must be effective and consistently implemented both in case of external and internal reporting as well as in case of public disclosure of violations, in accordance with regulations. It is also necessary to ensure effective protection of intermediaries and related persons who are entitled to such protection under the law governing the protection of whistleblowers. Related to objective 61 (INTERNAL AFFAIRS) | Inefficient implementation of WPA (no established internal reporting routes, replacement of trustee, etc. is not regulated)."                                                                                                                                                                      | Strengthening of the whistleblower protection institute.                                                                                                                                                                                                                                                      | 1. Fostering the supervision of the implementation of the WPA (monitoring of the established mechanisms according to the WPA - internal application route, operation of the trustee, understanding of the trustee's role by the courts, etc.).<br>2. Analysis of the effectiveness of WPA (achievement of goals in practice) and preparation of potential changes to the law or practice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1. CPC<br>2. CPC                                                                                                                                                                                                                       | 1. all designated<br>2. MJ, obligated persons                                                                    | 1. 2026<br>2. 2028                             | 1. Design methodology for control, performed control according to the methodology.<br>2. Ex-post evaluation of the effectiveness of WPA.                                                                                                                                                                      |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Employees do not report violations of regulations (e.g. unauthorized influence).                                                                                                                                                                                                                   | Raising awareness on the importance of reporting violations.                                                                                                                                                                                                                                                  | 1. Risk analysis of reasons for not reporting violations.<br>2. Designing a training module.<br>3. Implementation of professional education and training in the field of protection of whistleblowers on the importance of reporting violations of regulations with the presentation of the mechanisms of appropriate action.<br>4. Implementation of partner programs to raise awareness and support applicants."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | CPC                                                                                                                                                                                                                                    | 4. NGOs, other institutions (e.g. Mental health centers)                                                         | 1. 2026<br>2. 2026<br>3. 2027<br>4. 2026       | 1. Risk analysis.<br>2. Training module.<br>3. Number of conducted trainings.<br>4. Number of partnerships.                                                                                                                                                                                                   |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Public sector authorities and organizations are not obliged to establish compliance systems, especially in the area of compliance with regulations governing integrity. Only certain bodies and organizations of the public sector are                                                             | Strengthening business compliance programs in the field of integrity in legal entities that were founded or have a prevailing influence or a majority share in them by the Republic of Slovenia or a local community and are not obliged to implement an integrity plan.                                      | 1. Preparation of clear instructions and obligations for the creation of business compliance programs, which will also include the area of strengthening integrity, for legal entities established or in which the Republic of Slovenia or a local community has a prevailing influence or a majority stake.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | government or ministries, Slovenian Sovereign Holding, municipalities                                                                                                                                                                  |                                                                                                                  | 1. 2029                                        | New legal entities that have an established compliance program or the program additionally contains the area of integrity strengthening.                                                                                                                                                                      |

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| WORKING IN THE PUBLIC INTEREST | OBJECTIVE 13: The public sector and its employees must act exclusively in the public interest and prevent illicit influence and the exercise of private interests. Also linked to objective 43 (LABOR AND SOCIAL AFFAIRS)"                                                                                                                                         | Public sector and its employees of the public sector are obliged to produce an integrity plan.                                                                                                                                                                                                                                                                                                                                              |                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1. Upgrade of integrity plans with internal compliance mechanisms for all key processes in the institution (e.g. issuance of decisions).<br>2. Appointment of an integrity officer with all powers from the Guidelines for the Implementation of Integrity Plans, no. 0074-1/2024/2, dated 29 November 2024 (monitoring of processes, internal training, etc.). | Zavezanici za načrt integritete                                            | CPC | 1 and 2 2030                          | The number of taxpayers who have upgraded their integrity plan and appointed an integrity officer.                                                                                                         |
|                                |                                                                                                                                                                                                                                                                                                                                                                    | The integrity plan is largely not used as a business compliance tool.                                                                                                                                                                                                                                                                                                                                                                       | Upgrade of integrity plans and implementation of integrity officers as internal business compliance mechanisms.         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                 |                                                                            |     |                                       |                                                                                                                                                                                                            |
|                                |                                                                                                                                                                                                                                                                                                                                                                    | There are no clear rules regarding the way officials communicate in public (expressing one's own opinions, hate speech, providing false information, misuse of communication for private interest), so communication can also be detrimental to the reputation of the public sector. Officials are not aware of their own responsibility for strengthening integrity, which they also express through the way they communicate in public.") | Improving public officials' communication.                                                                              | 1. Making officials aware of their responsibility for the way they communicate in public.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | all bodies where officials perform functions                                                                                                                                                                                                                                                                                                                    |                                                                            |     | 1. 2026                               | Awareness campaign.                                                                                                                                                                                        |
|                                |                                                                                                                                                                                                                                                                                                                                                                    | The rules regarding the acceptance of gifts are not applicable in practice, they also do not address certain practices, leading to the officials and civil servants not having clear instructions for dealing with gifts in these cases, which can lead to a conflict of interests or damaged reputation.")                                                                                                                                 | Improving the gift management system.                                                                                   | 1. Analysis of the situation and possible drafting of a proposal for amendments to the IPCA, if legal deficiencies are detected.<br>2. Designing guidelines for public sector institutions to change practice (according to existing legislation).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1. MP<br>2. CPC and MPA                                                                                                                                                                                                                                                                                                                                         | Protocol of the Republic of Slovenia, GSV, UPR, MZEZ                       |     | 1 and 2 2030                          | 1. Analysis of the situation and potential preparation of a draft regulation (if the need arises)<br>2. designed orientations.                                                                             |
| TRANSPARENCY                   | OBJECTIVE 15: Public sector institutions and employees must ensure the greatest possible transparency of their procedures and operations, as well as effective communication and cooperation with the public.                                                                                                                                                      | Publicly available data on the operation of public sector institutions is not effectively linked with data on the mandatory observance of integrity standards (rules regarding restrictions of business activities, conflicts of interest, etc.), which reduces the effectiveness of public control over the activities of public sector institutions and public trust in their operation.                                                  | Strengthening the transparency of state and municipal authorities.                                                      | 1. Publication of information on essential institutes of IPCA (assets, restrictions of business activities, gifts, etc.) on the authorities' websites. CPC publishes guidelines on publication thereof.<br>2. Publication of lists of state and municipal representatives in public companies and public institutions and other public institutions on the bodies' websites.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1. state and municipal authorities; CPC<br>2. ministries, municipalities                                                                                                                                                                                                                                                                                        |                                                                            |     | 1. 2027<br>2. 2028                    | The number of web pages that contain transparent data.                                                                                                                                                     |
|                                | OBJECTIVE 16: All public sector institutions must act transparently, with the involvement and cooperation of the interested public, when making decisions, including regarding regulations. When preparing regulations, they must be guided by the principles of transparency, quality and certainty. Also linked to goals 42 (CIVIL SOCIETY) and 65 (ENVIRONMENT) | Due to the separate publication of the regulations' proposals and records on lobbying contacts, the latter do not have the appropriate weight in ensuring transparency and enabling public control over lobbying and influencing changes in legislation.                                                                                                                                                                                    | The establishment of a comprehensive legislative tracking mechanism for each proposal of a general legal act or policy. | 1. Ensuring the integration of all tools (e.g. within the eLegislation platform) for the drafting of regulations' proposals (e.g. e-democracy, results of the so-called Živa project) and tools where records of lobbying contacts (ERAR) are published, with the aim of comprehensive transparency of the legislative track.<br>2. Based on the analysis of the effects of integration of all tools for the preparation of regulations with records of lobbying contacts, consideration is given to the creation of a legal basis that would contain a clear definition of the legislative tracking system, the obligation of the drafters of regulations and policies to incorporate legislative tracking in all received proposals that relate to the regulation/policy in question, regardless of the manner of receipt (proposals before the start of the formation of amendments/draft legislation, proposals received in the public discussion, through lobbying, etc.), as well as the obligation to include a comprehensive legislative tracking in the draft regulation proposed to the Government of the Republic of Slovenia for adoption or by the Government to the National Assembly for adoption.<br>3. As the competent authority for verifying the completeness of material for government's consideration, relying on the Rules of Procedure of the Government and the Resolution on normative activity (indication of received comments/suggestions from the public and responses to them), the Secretariat-General of the Government rejects inconsistent materials and forwards them to the proposer for addition. | 1. Government office for legislation<br>2. Government office for legislation<br>3. Secretariat-General of the Government                                                                                                                                                                                                                                        | 1. CPC, MPA, MP in ostala ministrstva, ki so skrbniki posameznih aplikacij |     | 1. 2030<br>2. 2030<br>3. 2030         | 1. Established connection or comprehensive legislative track.<br>2. Forming the basis for connecting the tools, if it turns out to be necessary.<br>3. Number of reviews and number of rejected materials. |
|                                |                                                                                                                                                                                                                                                                                                                                                                    | Non-inclusion of the public in the process of drafting regulations at the national and local level.                                                                                                                                                                                                                                                                                                                                         | Strengthening the transparency and correct implementation of procedures for adoption of regulations.                    | 1. Ensure consistent compliance with the Resolution on normative activity, or its mutatis mutandis application at the local level, primarily with regard to the early involvement of various groups of the public (including other bodies affected by the regulation) in the process of drafting regulations' proposals, by training civil servants of ministries and municipalities on the goals and methods of implementing the said resolution.<br>2. Improving the quality of the [public] presentation of comments/suggestions received from the interested public and the drafters' responses to them.<br>3. Dissemination of guidelines for citizens' participation in the drafting of regulations and public policies and guidelines for the preparation and implementation of participatory budgeting. Real-time publication of proposals and adopted municipal acts on the municipality's website in a user-friendly manner.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1. Secretary General of the Government of the Republic of Slovenia, Slovenian Sovereign Holding, municipalities<br>2. CPC<br>3. legal entities in which the State or the municipalities have a prevailing influence                                                                                                                                             | relevant ministries, municipalities                                        |     | 1 and 2. permanent measure<br>3. 2026 | Published draft regulations, the number of upgraded municipal websites, the number of civil servants undergoing training                                                                                   |

|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                           |                                                                                                           |                                                                                                                                     |                                                                                                                                         |
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| APPOINTMENTS AND EMPLOYMENT | <p>OBJECTIVE 20: All stages of appointment and employment procedures in the public sector must be transparent, independent of undue influence and must ensure equal treatment in procedures.</p> <p>OBJECTIVE 21: Management positions must be occupied by persons with a high level of integrity who are also professionally qualified and have relevant management experience.</p> <p>Also related to objectives 54 (LOCAL GOVERNMENT), 77 (FOREIGN AFFAIRS)*)</p> | <p>Persons without appropriate skills are appointed to positions in the management and control bodies of companies where the Government of the Republic of Slovenia exercises the rights of the Republic of Slovenia as a shareholder or partner, to the councils of public agencies, public institutes and other public institutions. A similar risk is present also at the municipal level.</p> <p>The criteria for appointments in supervisory bodies are not clear and known in advance. Personal suitability or integrity of a person is not recognized as a criterion for appointment.</p>                                                                  | Strengthening the transparency and professionalism of selection procedures. Strengthening the competence of members of management and supervisory bodies.                                  | <p>1. Establishment of appropriate transparent procedures for proposing or appointing members of supervisory bodies (obligation of a public tender, a selection commission, pre-determination of criteria and indicators for fulfilling the required conditions (e.g. inclusion of the candidate's personality suitability for functions and positions, where applicable), preparation of materials with reasoning/explanation for the Government's decision process on the appointment of a candidate).</p> <p>2. Drafting of recommendations for the unification of criteria and conditions of appointment of the founder's representatives to the companies' bodies in which the local community has a majority stake or a prevailing influence.</p> <p>3. Transparent publication of lists (all in one place) of municipal/state representatives in legal entities in which the state or municipalities have a prevailing influence, including a brief presentation of representatives' professional competences, and if they are appointed in the supervisory body to oversee a certain area of company's operation, also an indication of that area.</p> | <p>1. CPC</p> <p>2. all relevant ministries with public institutes and municipalities</p> | <p>1. - 3. 2026</p>                                                                                       | <p>1. Established transparent procedure.</p> <p>2. Prepared recommendations.</p> <p>3. Publication of lists of representatives.</p> |                                                                                                                                         |
|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Members of the councils of public institutes, public agencies and other public institutions, as well as other members of various supervisory bodies, are not sufficiently qualified to perform their duties in a high-quality manner.</p>                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Strengthening the competence of board members of public institutions and agencies in the field of integrity and internal compliance mechanisms.</p>                                     | <p>1. Designing an e-training module.</p> <p>2. Ensuring participation in regular (introductory and periodic) e-training of council members.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | CPC                                                                                       | <p>MPA, ministries and municipalities that own or manage physical assets, public infrastructure, etc.</p> | <p>1 and 2 2027</p>                                                                                                                 | <p>1. Designed module.</p> <p>2. Number of training sessions and number of participants.</p>                                            |
|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>Strengthening the knowledge of various supervisory mechanisms (members of supervisory councils, project groups, supervisory boards of municipalities, etc.).</p>                        | <p>1. Establishment of an interdepartmental group that will determine the content of regular and systematic training (all aspects of control over public property - real property, public infrastructure, etc.).")</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | CPC                                                                                       | <p>ministries or municipalities (distribution of the declaration)</p>                                     | <p>1. 2028</p>                                                                                                                      | <p>Designed training content, number of training sessions.</p>                                                                          |
|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Risks related to the operation and decision-making within the council of an institute and other public institutions:<br/>- failure to take into account the conflict of interests in decision-making within the institution;<br/>- simultaneous different roles of members of the council/board of the institution, which may be incompatible and pose a risk of conflict of interests (e.g. a member who is appointed to the board of the institution as a representative of the founder (municipality or state) is also employed in a public institution or/and at the same time also the parent of a child who is educated in that public institution).</p> | <p>Strengthening the commitment of members of councils of institutes, public agencies and other public institutions to integrity, transparency and avoidance of conflicts of interest.</p> | <p>1. Forming of a declaration on avoiding conflict of interest or providing a record of awareness of the mandatory avoidance of conflict of interest in the minutes, which the individual signs / confirms upon appointment to the council/board of the institute or other public institution. The statement is of a declarative nature, intended to raise awareness.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Office of the President of the Republic of Slovenia</p>                                |                                                                                                           | <p>1. 2027</p>                                                                                                                      | <p>Formed statement, number of signed statements.</p>                                                                                   |
|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>The law does not provide for a procedure based on professional selection criteria for the appointment or nomination of candidates who, in accordance with the legislation, are appointed or nominated for appointment to positions by the President of the Republic. The inconsistency of the selection systems of candidates for the highest state positions where the appointment is performed or proposed to the National Assembly by the President of the Republic, does not enable a comparison of these appointments.</p>                                                                                                                                | <p>Performing the analysis.</p>                                                                                                                                                            | <p>1. Analysis, comparison and consideration of existing good practices in the appointment of candidates who, in accordance with the legislation, are appointed to positions or proposed for appointment by the President of the Republic. The findings and proposal for changes are forwarded to the MoPA.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>ministries, municipalities, other public funders via calls for tender</p>              |                                                                                                           | <p>1. 2030</p>                                                                                                                      | <p>A detailed analysis of the procedure for appointing officials by the President of the Republic.</p>                                  |
|                             | <p>OBJECTIVE 22: Public funds must be allocated to beneficiaries correctly and transparently, on grounds of an appropriate legal bases and clearly defined objective and professional criteria, whereby the accepted criteria is</p>                                                                                                                                                                                                                                 | <p>Lack of goal-orientation, transparency and expertise in public tenders.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Strengthening the strategic approach to public financing - public tenders follow strategic guidelines and are based on the analysis of needs/requirements.</p>                          | <p>1. Inclusion of the process and measures of public financing in the bodies' integrity plans, whereby the minimum measures should entail:<br/>a. the obligation to take into account strategic documents, needs analyses and evaluations when creating public tenders/calls,<br/>b. regular analysis of the success of tendering mechanisms (evaluation of the effects of the implemented projects with regard to the objectives of their public tenders, the opinion of potential contractors, etc.),<br/>c. regular review of project selection criteria and their concretization in accordance with the objectives of the public tender.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>ministries, municipalities, other public funders via calls for tender</p>              |                                                                                                           | <p>1. permanent measure from 2026 onwards</p>                                                                                       | <p>Number of integrity plan updates and upgrades.</p>                                                                                   |
|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>Strengthening integrity in the management of public tenders.</p>                                                                                                                        | <p>1. Encouraging the adoption of transparency standards, codes, integrity plans with the aim of strengthening integrity, transparency and preventing corruption among recipients of public funds (consideration of government guidelines).<br/>2. Stimulation due to the use of transparency standards (e.g. as entry criteria, evaluation criteria for additional points, etc.).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>Administration Academy - MPA</p>                                                       |                                                                                                           | <p>1 and 2 2027</p>                                                                                                                 | <p>Adopted starting points / guidelines on promoting transparency among recipients of public funds; the number of upgraded tenders.</p> |

|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                 |                         |                                                                                                                 |                                                                                                                                                                                                                                      |
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| DISTRIBUTION OF PUBLIC FUNDS  | <p>The distribution of funds must not be subject to political influence and private interests.</p> <p>OBJECTIVE 24: The distribution and use of public funds must be subject to independent and effective control that successfully avoids unauthorized pressures.</p> <p>Also linked to objective 42 (NON-GOVERNMENTAL ORGANIZATIONS), 53 (CULTURE).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Strengthening the competence of civil servants and members of expert commissions.                                                                                                                                                                                        | 1. Training for those that facilitate tenders and members of expert commissions on the topic of integrity in the management of public tenders.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | ministries, municipalities, other public funders (e.g. Public Book Agency, Public Fund of the Republic of Slovenia for Cultural Activities)<br>Ministries, municipalities and other bodies (e.g. Motorway Company of the Republic of Slovenia, Slovenian Infrastructure Agency, Slovenian Railways) that enter into public-private partnerships | CPC                     | 1. 2027                                                                                                         | Number of training sessions, number of participants.                                                                                                                                                                                 |
|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Improper application of public finance legislation in the allocation of budget funds (public tenders and calls, public procurements, direct contracts, public-private partnerships) and unlawful spending of public funds.</p> <p>Corruption risks due to ineffective implementation of internal controls (internal compliance mechanism), which also include measures to detect suspicions of fraud, money laundering, double financing and conflicts of interest.</p>                      | The establishment or upgrading of the internal compliance mechanism (internal controls) or fostering the assessment of effectiveness of the already established internal controls of the public funds distribution process.                                              | <p>1. Establishment or upgrading of internal controls over the implementation of public funds distribution processes.</p> <p>2. Proposal of risks and measures. Inclusion of the internal controls process into the integrity plan.</p> <p>3. Checking the effectiveness of the implementation of internal controls.</p>                                                                                                                                                                                                                                                                                                                                                                                                   | buyers and managers of state-owned or municipal property                                                                                                                                                                                                                                                                                        |                         | <p>June 1, 2026</p> <p>June 2, 2026</p> <p>3. every other year until the end of October</p>                     | The number of established internal controls or the number of checks on the effectiveness of internal controls.<br>Number of proposed and implemented corrective actions.                                                             |
| MANAGEMENT OF PUBLIC PROPERTY | <p>26: Public asset management procedures, especially when they involve direct customer contact, must be conducted lawfully, limiting potential undue influence, conflicts of interest, illicit gifts, and other risks of corruption and integrity violations.</p> <p>OBJECTIVE 28: The management of public assets, including in the public procurement procedures and allocation of public funds, must be transparent and economical and must take into account the principle of equal treatment, limiting the risks of corruption and breach of integrity, conflicts of interest and unauthorized influences, including political influences. Public funds must be distributed on the basis of pre-defined objective criteria.</p> <p>Also linked to objective 36, 38 and 41 (INFRASTRUCTURE), 54 (LOCAL SELF-GOVERNMENT)</p> | <p>Ambiguity and differences between ministries in the procedures for purchasing and managing real assets.</p> <p>Non-transparent management of documentation related to the purchase and management of real property.</p> <p>Deficient implementation of internal controls.</p> <p>Validation of unreasonable projects.</p>                                                                                                                                                                    | Strengthening the transparency of procedures for purchasing and managing real assets.                                                                                                                                                                                    | <p>1. Consistent recording of all documentation.</p> <p>2. Consistent recording of all persons present at all meetings related to the handling of real property.</p> <p>3. Establishment of a working group with the early involvement of relevant stakeholders (e.g. users of real property) before the start of activities.</p> <p>4. Definition / upgrading of risks and measures related to the purchase of real estate and other handling of tangible assets in the integrity plan of the individual body.</p> <p>5. Review and identification of the necessary changes in the bodies' internal acts determining the purchase and management of real assets, taking into account the perceived corruption risks .</p> | <p>1. representative associations of municipalities</p> <p>2. municipalities</p>                                                                                                                                                                                                                                                                | MPA                     | 1st - 3rd permanent measure<br>4. 2026<br>5. 2026                                                               | <p>1. and 2. Complete documentation.</p> <p>3. Number of working groups in relation to the number of purchases for "external end users".</p> <p>4. Number of updated integrity plans.</p> <p>5. Number of updated internal acts.</p> |
|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Non-strategic and uneconomic disposal of real estate at the local level (for example: sale for too low a price, sale of municipally owned land contrary to the public interest; unjustified and non-transparent changes in the land use; failure to exercise the right of pre-emption in order to enable benefits for individuals or legal entities with personal, political or business connections; acquisition of premises unsuitable for public needs in order to enable private benefits). | Increasing the transparency of real property management at the local level.                                                                                                                                                                                              | <p>1. Analysis of good practices and design of drafts (models) of the announcement of the decision on the rental of premises owned by the municipality, data on the selection of the tenant such as: tenant, premises, purpose, period, price and explanation of the reasons for the selection, especially if several applicants were interested in renting.</p> <p>2. Publication of data on a single site (all in one place) on the municipalities' websites.</p>                                                                                                                                                                                                                                                        | purchasers and managers of immovable property owned by the State or municipalities DARS, DRSI and other public infrastructure managers                                                                                                                                                                                                          | CPC                     | 1. 2029<br>2. 2030                                                                                              | Analysis of good practices; the number of municipalities that transparently published the data.                                                                                                                                      |
|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Corruption risks due to ineffective implementation of internal controls (internal compliance mechanism), which also include measures to detect suspected fraud, money laundering and conflicts of interest in the management of public assets (real property of the state and municipalities, public infrastructure).                                                                                                                                                                           | The establishment or upgrading of the internal compliance mechanism (internal controls) or fostering the assessment of the efficiency of the already established internal controls in the processes of purchase and management of real assets and public infrastructure. | <p>1. Establishment or upgrading of internal controls in the processes of purchase and management of real property and public infrastructure.</p> <p>2. Proposal of risks and measures. Inclusion of internal control processes into the integrity plan.</p> <p>3. Checking the effectiveness of the implementation of internal controls.</p>                                                                                                                                                                                                                                                                                                                                                                              | all state aid providers (ministries, SID Bank, SPS and others).                                                                                                                                                                                                                                                                                 | recipients of state aid | <p>June 1, 2026</p> <p>June 2, 2026</p> <p>3. every other year until the end of October</p>                     | The number of checks on the effectiveness of internal controls.<br>Number of proposed and implemented corrective actions.                                                                                                            |
|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Issued opinions on the compliance of state aid, do not do not correspond with state aid rules.                                                                                                                                                                                                                                                                                                                                                                                                  | Increasing the quality of issued opinions on the compliance of state aid (indication on the basis of which state aid rules the opinion was drawn up, providing opinions on all criteria, criteria and/or guidelines).                                                    | <p>1. Checking whether it is necessary to issue updated / new instructions for issuing opinions</p> <p>2. Sample review of issued opinions with regard to their completeness and correctness.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>1. MF for grant providers, state aid providers for beneficiaries</p> <p>2. all state aid grantors</p>                                                                                                                                                                                                                                        | recipients of state aid | 1st and 2nd standing measure                                                                                    | The number of correctly issued opinions.                                                                                                                                                                                             |
|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | State aid is not granted in accordance with the principles of transparency, economy, equal treatment, integrity and in accordance with objective criteria.                                                                                                                                                                                                                                                                                                                                      | <p>Increase knowledge in the field of state aid rules.</p> <p>Multi-level verification of the of state aid granting: strengthening of internal compliance verification mechanisms (upgrading of integrity plans).</p>                                                    | <p>1. Education and seminars for all providers of state aid.</p> <p>2. Study and follow-up of cases at the EU level (jurisprudence of the Court of Justice of the EU).")</p> <p>1. Design of examples of risks and measures.</p> <p>2. Definition of risks and measures in the area of state aid allocation in the integrity plan.</p>                                                                                                                                                                                                                                                                                                                                                                                     | <p>1. CPC</p> <p>2. all state aid grantors</p> <p>ministries and municipalities granting concessions</p>                                                                                                                                                                                                                                        |                         | <p>1st and 2nd standing measure</p> <p>June 1, 2026</p> <p>December 2, 2026, the upgrade is an ongoing task</p> | Identified and implemented corrective actions.<br>Number of successful appeals against the selection of recipients by competitors.                                                                                                   |
|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | The review of concessions granted and established legal relationships is not transparent.                                                                                                                                                                                                                                                                                                                                                                                                       | Increase of transparency through public announcement of concession contracts.                                                                                                                                                                                            | 1. Publication of concession contracts for each individual entity (ministry, municipality) in a transparent, user-friendly manner (e.g. in one place on existing portals, such as the Register of partners for public information at AJPES - Agency of the Republic of Slovenia for Public Legal Records and Related Services).                                                                                                                                                                                                                                                                                                                                                                                            | <p>1. - 3. budget users at national and local level</p> <p>4. UJP</p>                                                                                                                                                                                                                                                                           | UNP, RS                 | 1. 2027                                                                                                         | Publishing contracts on a publicly accessible website in a transparent manner.                                                                                                                                                       |

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|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Abuses in the execution of payment transactions of public funds (e.g. transfer of public funds without valid documents as grounds for this transfer, abuses of online bank users on account of the use of foreign identification for double authentication, unauthorized access or data disclosure etc.)</p> <p>Knowingly abusing and using foreign or inactive user accounts, duplicating payments and avoiding mandatory multi-level confirmation of payment, and falsifying or abusing authorizations to make payments, including unauthorized access to payment systems.</p> <p>Irregularities in case of collective signing performed by external contractors without the participation of the designated person of the body competent for facilitation of the payment.</p> <p>Inadequate separation of powers and control.</p>                                                                                                                                                                                                                                       | <p>Strengthening control over the execution of processes in the preparation and execution of payments.</p> <p>Preventing unauthorized persons from accessing the payment system.</p> <p>Upgrade of the collective signing process (add an additional condition, i.e. "if one signature is from an external contractor (e.g. authorized accounting), the other must be signed by the responsible person of the competent authority), if the need arises.")</p> | <ol style="list-style-type: none"> <li>1. Introduction of an audit trail if it has not yet been established at the authority.</li> <li>2. Introduction and consistent use of internal controls in the process of implementation.</li> <li>3. Identification and implementation of corrective measures in the event of detected irregularities.</li> <li>4. Analysis of the regulation and review of practice as well as a potential change of the regulation, if needed.</li> </ol>                                                                                                                                                                                                                                               | <ol style="list-style-type: none"> <li>1. - 3. budget users at national and local level</li> <li>4. Public Payments Administration</li> </ol> | Budget Supervision Office of the Republic of Slovenia, Court of Audit                                                           | <ol style="list-style-type: none"> <li>December 1, 2026</li> <li>June 2, 2026</li> <li>permanent measure</li> <li>June 4, 2026</li> </ol> | <ol style="list-style-type: none"> <li>1. Reduction in the number of criminal charges.</li> <li>2. and 3. Number of implemented corrective measures in case of discovered irregularities.</li> <li>4. Amendment of the regulation, if the need arises.</li> </ol> |
| PUBLIC CONTRACTS /PUBLIC PROCUREMENT PROCEDURES | <p>OBJECTIVE 29: Public procurement procedures in the Republic of Slovenia must be carried out legally, efficiently and by limiting the risks of corruption and breach of integrity, conflicts of interest and undue influence. These risks must be limited before the start of the public procurement process, in the phase of determining the needs, in order to avoid unjustified preferences of a particular provider.</p> <p>OBJECTIVE 30: It is necessary to limit the risks in the special public procurement procedures, including in registered procurement contracts, as well as prevent the unjustified use of special procedures where there is a risk of fragmentation of the public procurement with the aim to meet the legally permitted contract value where contracts can be concluded without a public tender.</p> <p>OBJECTIVE 31: There must be regular, continuous and independent control of public procurement procedures and of the implementation of the concluded contracts. Effective control must be established in the areas of risk management in the procurement of goods and services, as well as internal channels for reporting unethical or illegal requests and actions of employees, suppliers, potential candidates and providers of goods and services. Also linked to objective 34 (HEALTH)</p> | <p>Influencing the contracting authority (by potential bidders - indirectly and directly) during the planning and preparation phase of the public procurement in order to ensure that the public procurement will enable that they will be the selected bidder; the public procurement documentation is prepared in a way as to enable the selection of only one bidder; the process of preparing public procurement documentation is not transparent; the employees of the contracting authority do not recognize lobbying and conflicts of interest and do not take appropriate action in that regard; the procedure is not conducted in accordance with the legislation, especially with regard to the use of the legally required safeguards (not all relevant information is obtained, such as a declaration on the ownership structure, a list of entities connected to the official in terms of business restrictions, the admissibility of the bidder's participation, or not all the necessary checks are carried out, which increases the risks of corruption).</p> | <p>Establishment of a system that will improve control of the preparation and implementation of public procurement.</p>                                                                                                                                                                                                                                                                                                                                       | <ol style="list-style-type: none"> <li>1. Preparation of an e-manual on the implementation of the pre-order phase (implementation of market analyses, market research and implementation of expert dialogue).</li> <li>2. Examining the reasons for the inadequate implementation of the Public Procurement Act in practice and consideration of the necessary legislative changes in light of perceived deficiencies (e.g. the mandatory introduction of public procurement codes to enable the traceability of all transactions within the framework of public procurement and the establishment of a legal basis for enabling professional and civil public control over the implementation of public procurement).</li> </ol> | MPA                                                                                                                                           | CPC, Court of Audit, procurement contractors                                                                                    | <ol style="list-style-type: none"> <li>1. 2029</li> <li>2. 2030</li> </ol>                                                                | <ol style="list-style-type: none"> <li>1. Prepared digital manual.</li> <li>2. Prepared amendments to the ZJN, if necessary.</li> </ol>                                                                                                                           |
|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>Upgrading of training of contracting authority, including on IPCA and WPA institutes and internal control and auditing systems.</p>                                                                                                                                                                                                                                                                                                                        | <ol style="list-style-type: none"> <li>1. Provision of training on public procurement with content related to the IPCA institutes (in particular lobbying, conflict of interest, anti-corruption clause, declaration of ownership structure, breach of integrity) and WPA (internal application routes, measures to protect applicants) and regarding appropriate internal control and auditing to ensure greater competitiveness of providers.</li> </ol>                                                                                                                                                                                                                                                                        | MPA in cooperation with CPC                                                                                                                   | National Review Commission for Reviewing Public Procurement Award Procedures, Court of Audit, Competition Protection Agency     | <ol style="list-style-type: none"> <li>1. 2027</li> </ol>                                                                                 | <ol style="list-style-type: none"> <li>Number of implementations, number of training participants.</li> </ol>                                                                                                                                                     |
|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>Establishing or upgrading the internal compliance mechanism (internal control) for compliance with legislation in the field of public procurement, or fostering the verification of the effectiveness of already established internal controls.</p>                                                                                                                                                                                                        | <ol style="list-style-type: none"> <li>1. Establishment or upgrading of internal controls.</li> <li>2. Proposal of risks and measures. Integrating the internal controls process into the integrity plan.</li> <li>3. Checking the effectiveness of the implementation of internal controls.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                           | contracting authorities                                                                                                                       |                                                                                                                                 | <ol style="list-style-type: none"> <li>June 1, 2026</li> <li>June 2, 2026</li> <li>every other year until the end of October</li> </ol>   | <ol style="list-style-type: none"> <li>Number of integrity plan updates. The number of checks on the effectiveness of internal controls.</li> <li>Number of proposed and implemented corrective actions.</li> </ol>                                               |
|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>The emergence of various challenges in the practical implementation of public procurement, which are not timely addressed in the legislation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Strengthening of interdepartmental cooperation in identifying challenges in practice and their causes.</p>                                                                                                                                                                                                                                                                                                                                                 | <ol style="list-style-type: none"> <li>1. Organization of joint consultations with the aim of identifying challenges with the implementation of public procurement in practice.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | MPA                                                                                                                                           | contracting authorities, AVK, Court of Audit, National Review Commission for Reviewing Public Procurement Award Procedures, CPC | <ol style="list-style-type: none"> <li>1. 2028</li> </ol>                                                                                 | <ol style="list-style-type: none"> <li>set of identified challenges</li> </ol>                                                                                                                                                                                    |
|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>In the performance of their functions, the supervisory authorities detect deviations of public procurement procedures from the legislation, but due to the segmentation of perceptions and the large amount of data, a comprehensive insight into the issue is not possible.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>Establishment of a digital mechanism for enhanced detection of deviations in the execution of public contracts.</p>                                                                                                                                                                                                                                                                                                                                        | <ol style="list-style-type: none"> <li>1. Consideration of the development of a common digital tool for the identification of deviations from the requirements of public procurement legislation in the broader sense (PPA, IPCA, etc.) in the implementation of public procurement procedures, which are detected by various supervisory authorities in the exercise of their powers (Court of Audit, CPC, Competition Protection Agency, etc.).</li> </ol>                                                                                                                                                                                                                                                                      | CPC                                                                                                                                           | MPA, Court of Audit, National Review Commission for Reviewing Public Procurement Award Procedures, AVK and others               | <ol style="list-style-type: none"> <li>1. 2028</li> </ol>                                                                                 | <ol style="list-style-type: none"> <li>Designed specifications of a (common) digital tool.</li> </ol>                                                                                                                                                             |
|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Products (mainly digital tools) developed on the basis of a public tender turn out to be ineffective due to the lack of involvement of end users (various authorities, e.g. administrative units).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Increasing the efficiency and usability of products, especially digital tools.</p>                                                                                                                                                                                                                                                                                                                                                                         | <ol style="list-style-type: none"> <li>1. Engagement of end users in product development by the contracting authority (identification of needs and necessary functionality of the tool, testing, etc.)</li> <li>2. Verification of the product's effectiveness and usability by users.</li> <li>3. Possible upgrades of the product based on the perceived deficiencies.</li> </ol>                                                                                                                                                                                                                                                                                                                                               | Contracting Authorities                                                                                                                       |                                                                                                                                 | <ol style="list-style-type: none"> <li>1. - 3. 2028</li> </ol>                                                                            | <ol style="list-style-type: none"> <li>Increased satisfaction of end users of the product.</li> </ol>                                                                                                                                                             |
|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Participants in public procurement procedures at public health institutions (PHI) do not avoid conflicts of interest and circumstances that could influence or create the appearance of influencing the impartial and objective performance of their tasks. Medical personnel do not disclose to their superiors their connections with suppliers and merchants, they do not disclose their presentations at congresses, trainings, professional publications in magazines, etc.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <ol style="list-style-type: none"> <li>1. Establishment of a system for monitoring the conflict of interests of participants in public procurement within the PHIs.</li> <li>2. Training.</li> </ol>                                                                                                                                                                                                                                                          | <ol style="list-style-type: none"> <li>1. Review of the existing methods of keeping records of employees who may be directly or indirectly connected to bidders in such a way that their private, financial or economic interest may affect the objective and impartial performance of tasks related to public procurement. The introduction of records, if they do not yet exist, or the adoption of additional measures, if the existing ones are insufficient.</li> <li>2. Training of employees and management personnel.</li> </ol>                                                                                                                                                                                          | <ol style="list-style-type: none"> <li>1. Ministry of Health</li> <li>2. CPC</li> </ol>                                                       | CPC, Association of Health Institutions of Slovenia, Medical Chamber of Slovenia                                                | <ol style="list-style-type: none"> <li>1. 2026</li> <li>2. permanent measure</li> </ol>                                                   | <ol style="list-style-type: none"> <li>1. The number of established records in relation to the number of PHCs.</li> <li>2. The number of training courses and the number of persons involved in the training.</li> </ol>                                          |

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| HEALTHCARE               | OBJECTIVE 34: In the healthcare system, all risks of corruption, unauthorized influence and the dominance of private interests over the public interest must be effectively managed, especially in the cases of purchase of medical equipment and medical devices; in relations between private suppliers and public sector employees, in cases of doctors working in public institutions and private surgeries, and in the elimination of waiting lists. It is necessary to establish such working conditions that will enable or strengthen the integrity of employees, including sufficient resources for the optimal functioning of public health organizations and sufficient number of personnel. | The specification in public procurement allows the offer of only a specific provider, which raises doubts about the correctness of the procedure and opens various corruption risks (illegal lobbying, unauthorized influence on the choice, conflict of interests, etc.).                                                                                                                | Upgrading the public procurement system in PHIs.                                                                                                                                                                                            | 1. Regular systematic checking of the market (different manufacturers, different providers) with the help of publicly available registers.<br>2. Strengthening of internal compliance mechanisms (checking the progress of the process from the identified need for the product/service onwards), including the use of an integrity plan for risk management.<br>3. Reconsideration on the introduction of joint public procurements of the Public Health Service.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 1. PHIs<br>2. PHIs<br>3. Ministry of Health, Office for the Monitoring, Quality and Investments in Healthcare                                                                                | larger PHIs, chambers and associations of experts                                                                                                                                                                                                                                                                                                                             | 1. and 2. continuous measure<br>3. 2027                                          | 1. Market analysis reports.<br>2. Number of preventive and corrective measures taken.<br>3. Decision on possible joint orders of PHIs.                                                                                                |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Clash of interests at the PHI, that wishes to become a reference center for certain equipment / drug (tie to one supplier, which may represent a corruption risk, vs. the interest of the PHI to be recognized as a reference center).                                                                                                                                                    | Establishment of a protocol of conduct, including risk management, for PHIs wishing to enter into a reference center contract.                                                                                                              | 1. Creation of a protocol of conduct (e.g. mandatory notification of the Ministry of Health with the intention that the PHI wants to become a reference center, preparation of expert analysis, risk analysis, etc).<br>2. Acquaintance of the PHI with the handling protocol.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Ministry of Health                                                                                                                                                                           | Doctors' associations (Association of Health Institutions of Slovenia, Medical Chamber of Slovenia etc.)                                                                                                                                                                                                                                                                      | 1 and 2 2027                                                                     | Developed protocol of conduct established, records of concluded contracts.                                                                                                                                                            |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Failure to comply with regulations and decisions and recommendations of supervisory and independent state bodies by health care providers.                                                                                                                                                                                                                                                | 1. Establishment of a mechanism for regular monitoring of the responses of healthcare providers.<br>2. Strengthening the transparency and regularity of procedures.<br>Fostering of control over the implementation of corrective measures. | 1. Consider possible solutions how the Ministry of Health can regularly and ongoing follow up with the competent authorities' reports on (repeated) irregularities, recommendations and remedial measures for an individual healthcare provider.<br>2. Recurring irregularities identified in the financial-medical supervision of Health Insurance Institute of Slovenia, together with instructions for correct conduct, are published on the website of the said institute.<br>3. Foster the control of the implementation of corrective measures from item no. 1. and monitoring whether the identified irregularities are repeated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 1. Ministry of Health<br>2. Ministry of Health<br>3. Ministry of Health                                                                                                                      | 1. Health Inspectorate, Health Insurance Institute of Slovenia, Human Rights Ombudsman, patient's rights representative<br>2. Health Inspectorate, Health Insurance Institute of Slovenia, Human Rights Ombudsman, patient's rights representative<br>3. Health Inspectorate, Health Insurance Institute of Slovenia, Human Rights Ombudsman, patient's rights representative | 1. from 2025 onwards<br>2. once a year from 2025 onwards<br>3. from 2025 onwards | 1. Performed analysis.<br>2. Number of detected irregularities.<br>3. Ex-post evaluation of the effectiveness of the mechanism.                                                                                                       |
| INFRASTRUCTURE           | OBJECTIVE 37: It is necessary to ensure the greatest possible transparency of procedures of infrastructure construction and management and avoid the dominance of private interests over the public interest.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Corruption risks in the areas of big infrastructure projects due to the large number of partners involved, long and complicated procedures and larger financial resources.                                                                                                                                                                                                                | Adoption of the regulation.                                                                                                                                                                                                                 | 1. Adoption of the umbrella law on the process of planning, preparation, approval, implementation, monitoring and control of big infrastructure projects in accordance with the recommendations of the CPC:<br>1. Clear rules regarding the use of exceptions in public procurement,<br>2. public procurement procedures are primarily managed by internal capacities, if external contractors participate, a broad restriction on business activities should apply.<br>3. a broader declaration on the ownership structure should be proscribed,<br>4. mandatory use of codes for asset traceability,<br>5. publication of all key documents and project alternatives in the public,<br>6. public discussion already in the early stages of decision-making,<br>7. mandatory inclusion of monitoring of experts and the civil society<br>8. access by supervisory bodies also to secret or commercially sensitive documents, taking into account data protection.<br>* in the event that the umbrella law is not adopted, the above points should be included in the laws that (if) will be adopted for the individual project | Designated ministries with regard to the nature of the proposed projects (Ministry of the Environment, Climate and Energy, Ministry of Natural Resources and Spatial Planning, MPA, MJ etc.) |                                                                                                                                                                                                                                                                                                                                                                               | 1. 2027                                                                          | Adopted regulation.                                                                                                                                                                                                                   |
| LABOR AND SOCIAL AFFAIRS | OBJECTIVE 43: Procedures for granting rights and benefits to families, other groups of vulnerable persons, and unemployed individuals must be carried out efficiently and with mitigation of corruption risks, specifically regarding the avoidance of conflicts of interest in the procedures, undue influence, and the enforcement of private interests and breaches of integrity.                                                                                                                                                                                                                                                                                                                    | Corruption risks due to ineffective implementation of internal controls (internal compliance mechanism), which also include measures to detect breaches of legislation, suspected fraud, money laundering and conflicts of interest when issuing decisions related to the allocation of funds (social welfare, unemployment compensation, long-term care, etc.).                          | The establishment or upgrading of the internal compliance mechanism (internal control) of the decision-making processes, or fostering the verification of the effectiveness of already established internal controls.                       | 1. Establishment or upgrading of internal controls.<br>2. Identification of risks and measures. Entering the internal controls process into the integrity plan.<br>3. Verification of the effectiveness of the implementation of internal controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Ministry of Labour, Family, Social Affairs and Equal Opportunities, Ministry of Solidarity-Based Future, Centres for Social Work and other bodies that issue decisions in this area          |                                                                                                                                                                                                                                                                                                                                                                               | 1. June 2026<br>2. Jun. 2026<br>3. until the end of October every second year.   | Number of integrity plan updates, Number of verifications of the effectiveness of internal controls<br>Number of proposed and implemented corrective actions.                                                                         |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The implementation of a long-term care system can lead to corruption risks if attention is not paid to this from the beginning of the design of the processes.                                                                                                                                                                                                                            | Managing corruption risks in establishing processes within the long-term care system.                                                                                                                                                       | 1. Incorporation of corruption risk analysis and creation of appropriate measures for all processes within the long-term care system.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Ministry of Solidarity-Based Future                                                                                                                                                          | long-term care providers                                                                                                                                                                                                                                                                                                                                                      | 1. continuous measure                                                            | Identified risks and measures taken (e.g. within the integrity plan).                                                                                                                                                                 |
|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Inconsistent implementation of the Act on Personal Assistance, which can lead to corruption risks.                                                                                                                                                                                                                                                                                        | Improvement of the personal assistance mechanism and strengthening of control over all social services.                                                                                                                                     | 1. Analysis of the situation and potential preparation of amendments to the Act on Personal Assistance in light of any identified deficiencies.<br>2. System audit/review of the effectiveness of social services (personal assistance, long-term care, help at home, etc.), also from the point of view of access to financial resources, including FIHO.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1. Ministry of Labour, Family, Social Affairs and Equal Opportunities<br>2. Ministry of Labour, Family, Social Affairs and Equal Opportunities                                               | 1. IRSSV, CSDs, personal assistance providers<br>2. IRSSV, CSDs, personal assistance providers                                                                                                                                                                                                                                                                                | 1. 2026<br>2. 2028                                                               | Identified risks and measures taken (e.g. within the integrity plan).                                                                                                                                                                 |
| ECONOMY AND BUSINESS     | OBJECTIVE 44: Integrity, social responsibility and business compliance must become the guiding principles of the business operations of companies in the Republic of Slovenia. Businesses must actively implement these fundamental guidelines in their entire operation on the basis of a planned and established compliance and integrity management system.                                                                                                                                                                                                                                                                                                                                          | The corporate governance codes of companies in which the state or municipality holds a majority share or dominant influence do not have an effective enforcement and oversight mechanism in practice (especially for municipally-owned companies), and therefore owners do not use them for effectively identifying and addressing corruption risks related to the companies' operations. | 1. Strengthening the use of corporate governance codes.<br>2. Trainings for members of management and supervisory bodies and owners, upon appointment, followed by regular periodical training.                                             | 1. Implementation of trainings for companies' members of management and supervisory bodies and owners, including the presentation of recommendations regarding the use of corporate governance codes (upon appointment of members of management and supervisory bodies and periodical annual training)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | CPC                                                                                                                                                                                          | Community of Municipalities of Slovenia, Association of Municipalities of Slovenia, Association of Urban Municipalities of Slovenia                                                                                                                                                                                                                                           | 1. from 2027 onwards                                                             | The number of trainings conducted, the number of newly appointed members of management and supervisory bodies and owners, the number of members of management and supervisory bodies and owners attending regular, periodic training. |

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|                         | OBJECTIVE 45: There must be effective enforcement of accountability for violations in the oversight of the management of business companies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | The owner (particularly the municipality) does not regularly pursue claims for damages in cases of negligent or dishonest performance of supervisory duties, which have caused harm to a company in which the state or municipality holds a majority share or dominant influence.                                                                                                                                                                                                                                                                                                                                               | 1. Establishing the owner's due diligence in cases of identified damage caused to the company.<br>2. Annual training for the owner on the possibilities and necessity of pursuing claims for damages.                             | 1. Creation of guidelines regarding the owner's due diligence in the event of damage to the company (especially in the case of companies that are not managed by the Slovenian Sovereign Holding).<br>2. Preparation of a training module for owners and its implementation once a year.                                                                                                                                                                                                                                                                                                                                                                                    | 1. CPC in Ministry of Economy, Tourism and Sport<br>2. CPC in Ministry of Economy, Tourism and Sport                                  | 1. State Attorneys Office                      | 1. 2027<br>2. from 2027 onwards                          | 1. Adoption of guidelines.<br>2. Number of trainings, number of participating owners in relation to the number of all owners.                                                                                                                                                    |
| INSPECTION AUTHORITIES  | OBJECTIVE 49: Inspection bodies and inspectors must be independent in their work, and the specific procedures they carry out must not be subject to internal or external undue influence. To effectively limit such undue influence, the independence of inspections must be strengthened.                                                                                                                                                                                                                                                                                                                                                                                                                                         | Politics and external stakeholders (including taxpayers) publicly discredit the decisions of the inspection body, thereby affecting the independence of the inspection body or the inspector.                                                                                                                                                                                                                                                                                                                                                                                                                                   | Strengthening the consistent response of the inspection body in such cases.                                                                                                                                                       | 1. Creation of guidelines for the response of inspectors and authorities in such cases.<br>2. Formulation of guidelines for offering adequate protection to the inspector, including legal assistance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1. inspection bodies, ministries, MPA<br>2. inspection bodies, ministries, MPA                                                        | 1. Inspection Council<br>2. Inspection Council | 1. 2026<br>2. 2026                                       | 1. Adoption of guidelines.<br>2. Adoption of guidelines.                                                                                                                                                                                                                         |
|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Inspectors are independent in their work. The impermissible influence of the ministry, inspectorate, other authority, private legal entities or individuals may represent a corruption risk.                                                                                                                                                                                                                                                                                                                                                                                                                                    | Strengthening the independence of inspectors.                                                                                                                                                                                     | 1. Strengthening the use of the internal reporting mechanism by inspectors' greater awareness of undue influences that exceed the powers according to the Inspection Act, as well as about reporting options and the protections available to whistleblowers.<br>2. Examining the need to amend the Inspection Act regarding the grounds for the dismissal of the Inspector General (e.g., consideration of the impact of the possibility of dismissal without fault on the greater independence of the inspection body, comparison with the provisions of the Public Employees Act etc.                                                                                    | 1. inspection bodies, ministries, MPA<br>2. inspection bodies, ministries, MPA                                                        | 1. Inspection Council<br>2. Inspection Council | 1. from 2025 onwards<br>2. 2026                          | 1. The number of awareness raising sessions, the number of inspectors who received awareness raising training in relation to the number of all inspectors.<br>2. Analysis of the regulation.                                                                                     |
|                         | OBJECTIVE 50: Inspection procedures must be carried out efficiently, impartially, transparently and promptly, while the risks of corruption and integrity violations in these procedures must be limited. In the event of a possible staff shortage or a large backlog of cases, the prioritization of applications must be based on predetermined objective criteria.                                                                                                                                                                                                                                                                                                                                                             | Due to the absence of a methodology for the introduction of inspection control, priority resolution of cases, non-consideration of applications/initiatives and monitoring of consideration in order to ensure the effectiveness of inspection procedures, there are risks of corruption and breach of integrity, or of distrust in the work of inspection bodies.                                                                                                                                                                                                                                                              | Establishment of methodology and criteria for effective processing of applications/initiatives, introduction and management of inspectors, procedures, with a mechanism for monitoring the effectiveness of the mechanism itself. | 1. The methodology and criteria for the effective consideration of applications/initiatives for the introduction of insp. procedures, for the introduction of insp. procedures, for the priority resolution of cases and for the management of inspections, procedures, together with a methodology for monitoring the effectiveness of the mechanism.                                                                                                                                                                                                                                                                                                                      | all inspection bodies                                                                                                                 | Inspection Council                             | 1. 2027                                                  | 1. Number of updates of integrity plans<br>2. Number of internal guidelines by individual inspection bodies.                                                                                                                                                                     |
|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Inspectors do not initiate inspection or misdemeanor procedures, even though they should, or they do not conduct procedures efficiently (consistent observance of legal standards, equal treatment of all persons liable and consideration of applicable legislation, case law and the direction of the authority, provided for the purpose of uniform implementation of regulations).<br>In the procedures in which they decide on the rights and obligations of natural and legal persons, inspectors do not recognize the risks in the field of supervision, or do not act appropriately in relation to the perceived risks. | Fostering due diligence of inspectors regarding the introduction and management of inspection and misdemeanor procedures.                                                                                                         | 1. "Strengthening the internal compliance program (integrity plan), with internal controls, in relation to the work of the (chief) inspector in the area of (non-)initiation and management of inspection and misdemeanor procedures.<br>2. Preparation of internal guidelines for the implementation of misdemeanor procedures.                                                                                                                                                                                                                                                                                                                                            | 1. inspection bodies, ministries<br>2. inspection bodies, ministries                                                                  | 1. Inspection Council<br>2. Inspection Council | 1. from 2025 onwards<br>2. 2026                          | 1. Number of NCI updates.<br>2. Number of internal guidelines by individual inspection bodies.                                                                                                                                                                                   |
| CULTURE                 | OBJECTIVE 53: It is necessary to strengthen the consideration of the public interest in ensuring the conditions for the creation, dissemination, and protection of cultural assets in the field of public media. Cultural content must receive adequate financial resources and space within the programming scheme.                                                                                                                                                                                                                                                                                                                                                                                                               | Members of expert committees for awarding funds for the financing of cultural projects and programs do not possess sufficient knowledge in the areas of strengthening integrity, evaluation, conducting procedures, and preparing administrative decisions, as a result of which some adopted decisions are annulled in appeal procedures.                                                                                                                                                                                                                                                                                      | Strengthening the competence of members of expert commissions.                                                                                                                                                                    | 1. Ensuring a diverse composition of expert committees in accordance with actual capabilities (balanced representation by gender and age, a range of experience across different fields, and geographic dispersion of members' activities).<br>2. Training for members of expert committees on evaluation, procedure management, and drafting decisions (after their appointment and periodically).<br>3. Training in the field of specific institutes of the Integrity and Prevention of Corruption Act (ZIntPK) and the Public Interest in Culture Act (ZZPri) is conducted for professional collaborators of expert committees once a year.                              | 1. and 2. MK, Slovenian Book Agency, Slovenian Film Centre, Public Fund of the Republic of Slovenia for Cultural Activities<br>3. CPC |                                                | 1. 2026<br>2. continuous measure<br>3. from 2026 onwards | 1. Monitoring the implementation of the existing provisions of the Rulebook on Expert Commissions.<br>2. Number of training participants compared to all members of expert commissions.<br>3. 10% of the expert colleagues of the expert commissions took part in the trainings. |
|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Decisions on financing projects in the field of culture are not sufficiently professionally justified, which may give the impression of non-transparent or incorrect allocation of funds.                                                                                                                                                                                                                                                                                                                                                                                                                                       | Improving the quality of decisions on the financing of cultural projects in such a way that they are professionally justified.                                                                                                    | 1. Regularly informing the members of the expert commissions about the relevant case law related to the Ministry of Culture, in order to ensure the professional validity of the decisions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Ministry of Culture, Slovenian Book Agency, Slovenian Film Centre, Public Fund of the Republic of Slovenia for Cultural Activities    |                                                | 1. from 2026 onwards                                     | Number of briefings of members of expert commissions on relevant case law.                                                                                                                                                                                                       |
| LOCAL SELF - GOVERNMENT | OBJECTIVE 54: Local matters of public importance, which local self-government independently regulates (for example, spatial planning, construction of local roads and paths, provision of public utilities, construction of facilities, preschool and elementary childcare, municipal warden services, enabling conditions for economic development, and housing construction), must be based on professional expertise and the consistent consideration of the public interest of the local community. In decision-making, it is necessary to prevent the dominance of private interests over the public interest. In decision-making, it is necessary to prevent the predominance of private interests over the public interest. | Due to a lack of knowledge of legal requirements (e.g., conflicts of interest between members of municipal supervisory bodies and companies owned by municipalities, as well as between municipal officials and members of supervisory bodies), tasks are not carried out effectively (non-responsiveness, omission of due conduct).<br>Reduced public oversight due to a lack of information sharing and non-transparent operations.<br>Uncontrolled spending and distribution of public funds and disregard for the standards of a prudent manager.                                                                           | Establishing a control mechanism to ensure consistent performance of tasks by members of supervisory bodies.                                                                                                                      | 1. The Inspectorate for the Public Sector, as a misdemeanor authority, takes action in cases of violations of Article 10 of the Access to Public Information Act.<br>2. Strengthening the mechanism of internal business compliance (integrity plans), including internal controls.<br>3. E-training in the field of integrity and corruption prevention. Analysis of good practices and the development of a template for publishing clear criteria and benchmarks in procedures for the allocation of funds through public tenders, as well as the publication on municipal websites of the recipients of funds, the amounts received, and the purpose of the allocation. | 1. Public Sector Inspectorate<br>2. Municipalities<br>3. CPC in cooperation with MPA                                                  |                                                | 1. 2026<br>2. from 2025 onwards<br>3. 2027               | 1. Number of controls performed.<br>2. Ex-post evaluation of the effectiveness of the mechanism.<br>3. Number of trained, analysis.                                                                                                                                              |
|                         | OBJECTIVE 55: State financial support for ensuring                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Effective use of the Recommendations for the Implementation of Advertising Campaigns of Ministries, Bodies in the composition of ministries and government departments.")                                                         | 1. Review of the implementation and analysis of the effects of existing government recommendations and formulation of corrective measures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Government Communication Office                                                                                                       |                                                | 1. 2027                                                  | Review of media plurality performed.                                                                                                                                                                                                                                             |
|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Strengthening of transparency in the field of media ownership and monitoring of financial flows by public bodies and institutions.                                                                                                | Establishment of an application/portal (e.g. media overview) that will enable monitoring of media ownership and income from public bodies and institutions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Ministry of Culture                                                                                                                   |                                                | 1. 2029                                                  | Established application / portal (media overview).                                                                                                                                                                                                                               |

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| MEDIA            | transparency and state financial support on ensuring pluralism and democracy and the realization of public interest in the media must be transparent, based on objective and professional judgment.                                                                                                                                                           | The publication of state adverts in certain media under the pretext of advertising, but in fact it is covert financing of the media.                                                                                                                                                       | Provision of credible data on market share and other data that are important for the public interest and assessment of the media's credibility/importance.                             | 1. Review of media plurality, prepared by the competent ministry with the aim of verifying the realization of the public interest in the field of media and determining the effects of the provided financial support. The review of media plurality includes in particular the following key elements: review of media ownership, the media and advertising market, the representation of various social groups, interests and worldviews in the media, the diversity of program content and journalistic genres, review of access to information in local areas and the media labor market.                                                                                                                                                                                                                                                                                                                                                                                              | Ministry of Culture                                                                                                                                  |                                                                                     | 1. 2028                                                      | Established review of media plurality.                                                                                                                                                                                                                                                                         |
|                  | OBJECTIVE 58: The state must exercise effective control over the safeguarding of media pluralism and effectively prevent the concentration of power based on ownership.                                                                                                                                                                                       | Improper application of legislation in the implementation of procedures, corruption risks due to ineffective implementation of internal controls (internal compliance mechanism), which also include measures to detect suspected fraud, conflicts of interest and other corruption risks. | Establishing or upgrading the internal compliance mechanism (internal controls) or strengthening the verification of the effectiveness of already established internal controls.       | 1. Establishing or upgrading internal controls (designing protocols for detecting violations and risks of conflict of interest and corruption where they do not yet exist).<br>2. Checking the effectiveness of the implementation of internal controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Ministry of Culture, Agency for Communication Networks and Services of the Republic of Slovenia, Competition Protection Agency, Broadcasting Council |                                                                                     | 1. June 2026<br>2. every other year until the end of October | Number of performed verifications on the effectiveness of internal controls.<br>Number of proposed and implemented corrective actions.                                                                                                                                                                         |
|                  | OBJECTIVE 59: The media must maintain operational autonomy regardless of their sources of funding, including funding through including funding through the purchase of advertising space and the pursuit of other commercial activities. Media reporting on politics must be independent of the interests of political parties or political office holders.") | The risk that the advertising of political parties and other political actors in municipal newsletters will not be marked as political advertising in accordance with the EU Regulation 2024/900 on transparency and targeting in political advertising.                                   | Establishment of a mechanism for raising awareness and control regarding the implementation of rules on advertising of political parties and other political actors.                   | 1. Develop a revised Guide - include or revise the Political Advertising chapter and organize a consultation in the pre-election year.<br>2. Implementation of oversight by the Media Inspectorate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 1. MPA<br>2. Media Inspectorate                                                                                                                      | Ministry of Culture                                                                 | 1. 2026<br>2. continuous measure                             | 1. Revised guide.<br>2. Ex-post evaluation of the effectiveness of e-materials and training.                                                                                                                                                                                                                   |
| INTERNAL AFFAIRS | OBJECTIVE 60: Employees of the Police and the inspectorate responsible for internal affairs must be persons with a high level of integrity who consistently implement measures to limit corruption risks.                                                                                                                                                     | The work of the employees of the police is exposed to the risks of unethical behavior (conflict of interests, unauthorized acceptance of gifts, non-public contacts, neglect of due diligence, unauthorized disclosure of information, etc.)                                               | Strengthening of effective risk management in the field of conflict of interest, acceptance of gifts, complementary work, non-public contacts, unauthorized disclosure of information. | 1. Establishment of internal records on notification of conflict of interests, records on complementary work and activities, records on gifts received, records on non-public contacts.<br>2. Establishment of an internal compliance mechanism (integrity plan), with internal controls, for consistent identification and recording of conflicts of interest, recording of received gifts, notification and recording of supplementary work and activities and non-public contacts, and for consistent record keeping.<br>3. Preparation of a training module for employees, including managers, on conflicts of interest, complementary work and activities, received gifts and non-public contacts, and the implementation of training upon employment and regularly, periodically once a year.<br>4. Determination of the obligation to participate in the trainings referred to in item 3 in the internal act of the police.                                                         | Police                                                                                                                                               | 2. CPC                                                                              | 1. - 4. from 2025 onwards                                    | 1. Established records.<br>2. Ex-post evaluation of the effectiveness of the internal compliance mechanism.<br>3. Number of conducted trainings, number of newly employed participants of trainings, number of all employees who attended trainings.<br>4. Amended regulation.                                 |
|                  |                                                                                                                                                                                                                                                                                                                                                               | The nature of police work requires regular contact of police employees with the persons in question. Police officers can thus find themselves in situations in which closer contacts can pose a corruption risk.                                                                           | Establishment of a mechanism for effective management of corruption risks arising from regular contacts of police employees with the persons under consideration.                      | 1. Analysis of existing processes and measures to strengthen the integrity of employees in the police, determination of complaint procedures against the work of police officers, systematic control over the work of employees, with suggestions for improvement.<br>2. Preparation of instructions for employees on expected behavior in circumstances that represent corruption risks.<br>3. Preparation of training modules for candidates for police officers at the Police Academy and employees, based on the findings from item 1 and following the instructions from item 2, and the implementation of trainings twice a year.<br>4. Establishment of an internal compliance mechanism (integrity plan), with internal controls, for consistent behavior in accordance with the instructions.                                                                                                                                                                                     | Police                                                                                                                                               | 3. Ministry of Interior - Directorate for Police and Other Security Tasks           | 1. 4. from 2025 onwards                                      | 1. Analysis performed.<br>2. Instructions designed.<br>3. Designed module, number of conducted trainings, number of participants (candidates for police officers and employees based on the number of all employees).<br>4. Ex-post evaluation of the effectiveness of the internal compliance mechanism.      |
|                  | OBJECTIVE 61: The police and the inspectorate responsible for internal affairs must operate autonomously and must not be subject to unauthorized influences.                                                                                                                                                                                                  | Unauthorized influences on the operational work of the police.                                                                                                                                                                                                                             | Establishment of a mechanism for recognition and action in case of unauthorized influences in the operational work of the police.                                                      | 1. Creation of a protocol for identifying unauthorized influences and response mechanisms (internal security procedures) and establishing a contact point/unit within the police for forwarding information about unauthorized influences and their processing.<br>2. Analysis of regulations and existing processes within the police to identify systemic risks for unauthorized influences, with proposals for changes/improvements.<br>3. Establishment and operation of control over the operation of the protocol, response mechanisms and contact point/unit.<br>4. Preparation of a training module on unauthorized influences and appropriate action, establishment of regular training obligations for employees in the internal police act and regular, periodic training.<br>5. Establishment of an internal compliance program (integrity plan) to identify and take action in case of unauthorized influences in the operational work of the police, with internal controls. | Police                                                                                                                                               | 2. Ministry of Interior - Directorate for Police and Other Security Tasks<br>4. CPC | 1. - 5. 2025                                                 | 1. Formed protocol, established contact point / unit.<br>2. Performed analysis.<br>3. Performed control.<br>4. Prepared training module, number of conducted trainings, number of participants (police employees).<br>5. Ex-post evaluation of the internal compliance program to determine its effectiveness. |
|                  |                                                                                                                                                                                                                                                                                                                                                               | Undue influence (e.g. political) on promotions and transfers within the police.                                                                                                                                                                                                            | Establishing an effective system of promotions and transfers of employees within the police.                                                                                           | 1. Determination of criteria and a procedure that ensures promotions and transfers based on professional and objective, predetermined criteria.<br>2. Establishment of an independent commission for deciding on promotions and transfers, whose members will be appointed on the basis of predetermined professional and objective criteria.<br>3. Making employees aware of the risks of unauthorized influence in promotion and transfer procedures and of appropriate action.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Police                                                                                                                                               | 3. CPC                                                                              | 1. - 3. 2026                                                 | 1. Certain criteria and rules of procedure.<br>2. Established independent commission.<br>3. The number of awareness-raising activities carried out.                                                                                                                                                            |

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                 |                                                                                              |                                            |                                                                                                                                                                                                                                                                                                                               |
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| DEFENSE               | OBJECTIVE 63: Procurement procedures in the field of defense and security must strictly comply with the adopted strategic directions and strategic documents. These must be in harmony with each other in terms of content. Procurement procedures must be executed legally, economically and efficiently and by limiting the risks of corruption and breach of integrity, especially undue influence. Procurement procedures and execution of the contracts must be regularly and continuously monitored.                                                                                                                                                                                           | Ignoring strategic and planning documents from the field of defense in the implementation of key projects of equipment purchase.                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Fostering consistent adherence to strategic and planning documents in the implementation of equipment purchase projects and strengthening of transparency in the implementation of public procurement. | 1. Ensure that investment documentation references specific points in strategic and planning documents where the respective capacity is planned.<br><br>2. Establish an internal compliance program (integrity plan) to ensure that investment documentation aligns with strategic and planning documents, including internal controls.<br><br>3. Identify measures to strengthen the transparency and correctness of public procurement procedures (e.g., mandatory introduction of public procurement codes to enable traceability of all transactions within a procurement, inclusion of bodies holding relevant data, such as Office for the Prevention of Money Laundering, in procedures to verify the suitability of the provider, consistent application of the provisions of the IPCA on anti-corruption clauses and verification of ownership structure declarations, etc.). | Ministry of Defence                                                                                                                             |                                                                                              | 1. - 3. from 2025 onwards                  | 1. Reference to invest. Documentation.<br>2. Ex-post evaluation of the internal compliance program to determine its effectiveness.<br>3. Identified measures to strengthen transparency.                                                                                                                                      |
|                       | OBJECTIVE 64: The inter-sectoral commission, which gives preliminary consent to contracts carried out on the basis of Article 346 of the Treaty on the Functioning of the European Union, as well as contracts for the implementation of intelligence and counterintelligence activities, must ensure the lawful use of public funds in the public interest, including in procurement procedures where an exception to the principle of transparency applies.                                                                                                                                                                                                                                        | There is no previously obtained consent of the inter-sectoral procurement commission carried out pursuant to Article 346 of the Treaty on the Functioning of the European Union, as well as procurements for the implementation of intelligence and counter-intelligence activities.                                                                                                                                                                                                                                                                                                     | The establishment of a mechanism for consistently ensuring the prior approval of the inter- sectoral procurement commission.                                                                           | 1. Implementation of trainings once a year on the topic of Article 346 of the Treaty on the Functioning of the European Union.<br>2. Prepare internal acts that will ensure mandatory prior consent of the inter-sectoral procurement commission.<br>3. Establish an internal compliance program (integrity plan) to ensure the prior obtaining of consent, including internal controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 1. and 3. Ministry of Defence<br>2. contracting authorities                                                                                     |                                                                                              | 1. from 2025 onwards<br>2. 2027<br>3. 2027 | 1. Conducted training.<br>2. Accepted internal acts.<br>3. Ex-post evaluation of the internal compliance program to determine its effectiveness.                                                                                                                                                                              |
|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The number of public contracts concluded on the basis of Article 346 of the Treaty on the Functioning of the European Union, as well as contracts for the implementation of intelligence and counter-intelligence activities, is high and some contracts are unjustifiably concluded on this legal basis.                                                                                                                                                                                                                                                                                | Fostering monitoring of such contracts with regard to their eligibility and scope by the inter-sectoral procurement commission.                                                                        | 1. Ensure the review of applications for procurements under Article 346 of the Treaty on the Functioning of the European Union and for procurements for intelligence and counterintelligence activities by the inter-sectoral procurement commission.<br><br>2. Consistent reporting to the government on the implementation of procurements under Article 346 of the Treaty on the Functioning of the European Union and procurements for intelligence and counterintelligence activities for the previous year.<br><br>3. Preparation of annual statistical reports on procurements under Article 346 of the Treaty on the Functioning of the European Union and procurements for intelligence and counterintelligence activities.                                                                                                                                                   | 1. MPA - Inter-Sectoral Commission on Procurement<br>2. individual contracting authorities<br>3. MPA - Inter-Sectoral Commission on Procurement |                                                                                              | 1. - 3. from 2025 onwards                  | 1. The number of considered applications to the interdepartmental commission for orders, based on the total number of all applications.<br>2. The number of contracting entities that reported to the government, relative to the number of all contracting entities that executed such orders.<br>3. Annual report prepared. |
| ENVIRONMENT AND SPACE | OBJECTIVE 65: For sustainable development and ensuring a quality environment for future generations, the public interest must be taken into account and respected in all phases of spatial and construction procedures and in environmental protection procedures. Unauthorized influences and corruption must be limited both in the preparation of systemic documents as well as in the individual procedures of spatial planning and the issuance of environmental permits and environmental impact assessment procedures. In all of the above, the risks of conflicts of interest, which are especially present in procedures at the local level, must also be managed particularly effectively. | The deficiency or ambiguity of the Environmental Protection Act, related to the implementation of operational monitoring and the preparation of reports on environmental impacts, causes risks of conflict of interests (e.g. the client and the payer of OM are the same person, the possibility of influencing the contractor of OM; the legal entity carries out OM for itself; the order of submission of reports on OM enables the possibility of influencing the content; the preparers of environmental impact re"ports do not demonstrate sufficient professional competence).") | 1. Amendment of the regulation.<br>2. Increasing the competence of environmental impact assessment providers.                                                                                          | 1. Analysis of the situation and preparation of amendments to the regulation in view of any identified deficiencies.<br>2. Implementation of training for the persons responsible for preparing environmental impact assessments (practice, common mistakes, etc.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 1. Ministry of the Environment, Climate and Energy, 2. Ministry of the Environment, Climate and Energy                                          |                                                                                              | 1. 2026<br>2. from 2026 onwards            | 1. Amended regulation.<br>2. Conducted training, number of participants in relation to all PVO providers.                                                                                                                                                                                                                     |
|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Unconstitutionality of the Regulation on Limit Values of Noise Indicators in the Environment - The Government of the Republic of Slovenia must eliminate the established unconstitutionality within one year after the publication of the Constitutional Court decision (published on 22 July 2022).")                                                                                                                                                                                                                                                                                   | Adoption of the regulation.                                                                                                                                                                            | 1. Elimination of unconstitutionality by adopting the new Regulation on limiting indicators of noise in the environment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Ministry of the Environment, Climate and Energy                                                                                                 |                                                                                              | 1. 2026                                    | Adopted regulation.                                                                                                                                                                                                                                                                                                           |
|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Non-transparent publication of data in the area of emissions (implementation of operational monitoring), which is a risk of non-detection of violations under the jurisdiction of the Commission for the Prevention of Corruption.                                                                                                                                                                                                                                                                                                                                                       | Establishing a mechanism.                                                                                                                                                                              | 1. Establishment of a platform / system for monitoring emissions based on operational monitoring reports.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Slovenian Environment Agency                                                                                                                    |                                                                                              | 1. 2028                                    | Established platform/system.                                                                                                                                                                                                                                                                                                  |
| POLITICS              | OBJECTIVE 66: The highest political representatives at the state and local level must be persons who, in performing their duties, act exclusively in the public interest, taking into account the principle of separation of powers. When performing their duties, they must act transparently and with integrity and avoid accepting or exercising unauthorized influence.                                                                                                                                                                                                                                                                                                                          | The risk that political functions are not performed in the public interest, but in the interest of political parties. The risk that the highest political representatives at national and local level, due to the special interests of the political parties to which they belong, would act in accordance with these interests, instead of their conscience and in the public interest.                                                                                                                                                                                                 | Examining the need to change the regulations.                                                                                                                                                          | 1. Analysis of the legislation that regulates the areas to which the risks relate and the creation of possible proposals to change the legislation, according to the findings of the analysis (elections, political parties, breach of integrity, "bianco" resignation statements).<br>2. Examine whether the rules of operation of the Parliament ensure:<br>- appropriate participation of independent deputies in the functioning and exercise of the powers of the National Assembly;<br>- equality of parliamentary groups of unaffiliated deputies with other parliamentary groups (membership in working bodies, etc.).<br>Preparation of a proposal for changes, if the need arises.                                                                                                                                                                                           | 1. MPA, Ministry of Interior<br>2. Parliament                                                                                                   | 1. CPC, MP (and other ministries responsible for drafting legislation), Parliament<br>2. CPC | 1. 2029<br>2. 2026                         | 1. Conducted analysis and prepared changes to regulations, if necessary.<br>2. Prepared changes to the regulations, if the need arises.                                                                                                                                                                                       |

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|           | <p>OBJECTIVE 67: The transparency of the financing of political parties should be strengthened. The operation of political parties must not be subordinated only to the interests of their actual or potential supporters.</p>                                                                                                                                                                                                         | <p>The risk that political parties are financed non-transparently and illegally, for example by financing legal entities owned by individuals who are supporters of a certain political party.</p>                                                                                                                                                                                                                                | <p>Analysis of the situation and possible changes to the regulation.</p>                                                                                                         | <p>1. Comparative legal analysis of legislation and practice, including consideration of the need to prohibit indirect or direct ownership of political parties by other legal entities or to establish the same / similar funding restrictions that apply to political parties, including legal entities owned by political parties.</p> <p>2. Preparation of proposals for amendments to the legislation, if based on the analysis from item 1 shows the need.</p>                                                                                                                                                                                                       | <p>1. Ministry of Interior<br/>2. Ministry of Interior</p>                                                                                            |                                            | <p>1. 2027<br/>2. 2029</p>                           | <p>1. Prepared analysis.<br/>2. Prepared proposals for changes to regulations, if the need arises.</p>                                                                                                                                                                                                                                                |
| JUDICIARY | <p>OBJECTIVE 68: The independence and autonomy of the judiciary must be guaranteed. Judges must be independent and impartial in their decision making. The independence of the state prosecutor in the performance of the state prosecutor's office must be ensured.</p>                                                                                                                                                               | <p>Influence of politics or external stakeholders on the autonomy or independence of court decisions or on the independence of the public prosecutor's office or the public prosecutor's office in a particular case in a way that discredits the court/judge or the public prosecutor's office/public prosecutor (publicly) for disagreeing with the decision.</p>                                                               | <p>Strengthening the response to attacks on the independence and autonomy of courts and state prosecutors, or judges and state prosecutors.</p>                                  | <p>1. Public reaction of the court or the state prosecutor's office in such cases.<br/>2. The ministry's public response.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>1. Supreme Court/Supreme State Prosecutor's Office<br/>2. MJ</p>                                                                                   |                                            | <p>1. from 2025 onwards<br/>2. from 2025 onwards</p> | <p>1. Public responses.<br/>2. Public responses.</p>                                                                                                                                                                                                                                                                                                  |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>The influence of politics (of the national assembly or the government) in the process of electing judges/state prosecutors or appointing the president of the Supreme Court or the state prosecutor general in such a way that the candidate is not elected/appointed, despite the previously established suitability, because he/she is not/should not be at the will of the politician</p>                                   | <p>Amendment of the regulation.</p>                                                                                                                                              | <p>1. Analysis of the adequacy of the current regulation and the comparative legal regulation regarding the election and appointment of judges or state prosecutors.<br/>2. Preparation of proposals for changes to regulations based on analysis.</p>                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>1. MJ<br/>2. MJ</p>                                                                                                                                |                                            | <p>1. 2028<br/>2. 2028</p>                           | <p>1. Performed analysis.<br/>2. Prepared proposals for changes to regulations.</p>                                                                                                                                                                                                                                                                   |
|           | <p>OBJECTIVE 69: A normative framework must be provided that enables effective prosecution of corruption crimes and effective court proceedings.</p>                                                                                                                                                                                                                                                                                   | <p>Deficiencies in criminal legislation regarding corruption crimes (Criminal Code, Law on the Liability of Legal Persons for Criminal Offences).</p>                                                                                                                                                                                                                                                                             | <p>Amendment of the regulation.</p>                                                                                                                                              | <p>1. Amendments to Criminal Code. Law on the Liability of Legal Persons for Criminal Offences on the basis of the Convention on Combating Bribery of Foreign Civil Servants in International Business. Examining the need to increase the penalty for the crime of abuse of official position or official rights and the need for additional criminalization of illegal intervention in economic activity.</p>                                                                                                                                                                                                                                                            | <p>MJ</p>                                                                                                                                             |                                            | <p>1. 2026</p>                                       | <p>Change in regulations.</p>                                                                                                                                                                                                                                                                                                                         |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>Deficiencies in the criminal procedural legislation that affect the effectiveness of the prosecution of corruption crimes.</p>                                                                                                                                                                                                                                                                                                 | <p>Analysis of the need for changes to the regulation and amendment of the regulation.</p>                                                                                       | <p>1. Examining the need for changes to the Criminal Procedure Act regarding the deadline for filing an indictment and the deadline for the implementation of covert investigative measures (OECD recommendations). Study of the possibility of regulating newer forms of covert investigative measures and the need to expand the catalog of covert investigative measures to all corruption crimes.</p>                                                                                                                                                                                                                                                                  | <p>MJ</p>                                                                                                                                             |                                            | <p>1. 2026</p>                                       | <p>Change in regulations.</p>                                                                                                                                                                                                                                                                                                                         |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>The police, state prosecutor's offices and courts do not use a single identifier for each case under investigation in connection with corruption crimes, which makes it impossible to monitor the effectiveness of the country's criminal law response to corruption.</p>                                                                                                                                                      | <p>Establishing a uniform identifier for cases related to corruption crimes to be used by the police, prosecution and judiciary.</p>                                             | <p>1. Agreement on data to be monitored in order to assess the effectiveness of the country's criminal law response to corruption.<br/>2. Creation of a uniform identifier of corruption crimes.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>MJ, Ministry of Interior</p>                                                                                                                       | <p>CPC</p>                                 | <p>1. and 2. 2028</p>                                | <p>Establishing a unique identifier.</p>                                                                                                                                                                                                                                                                                                              |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>Failure to use the measures of the judicial/public prosecutor's administration from the point of view of ensuring the timeliness of prosecution and trial for corruption crimes.</p>                                                                                                                                                                                                                                           | <p>Strengthening the use of measures by the judicial/public prosecutor's administration in order to ensure the timeliness of the prosecution and trial of corruption crimes.</p> | <p>1. Determination of criteria for the quality of court work (Article 60c of the Courts Act) in such a way as to encourage the resolution of cases without delays.<br/>2. Consistent use of process institutes and continuous consideration at the case level.<br/>3. Encouragement to judges to speed up the handling of corruption crimes in accordance with the second paragraph of Article 13.a of the Courts Act.<br/>4. Systematic implementation of court administration measures provided for by legislation, including internal control measures provided for by Courts Act and Judicial Service Act.<br/>5. Implementation of appropriate internal control.</p> | <p>1. - 4. Supreme Court<br/>5. Supreme State Prosecutor's Office</p>                                                                                 | <p>MJ</p>                                  | <p>1. - 5. 2027</p>                                  | <p>1. Certain criteria.<br/>2. Ex-post evaluation of the effectiveness of the use of process institutes.<br/>3. Number of expedited cases.<br/>4. Ex-post evaluation of the effectiveness of the implementation of judicial administration measures.<br/>5. Implementation of internal controls and the number of identified corrective measures.</p> |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>(In)sufficient professional competence.</p>                                                                                                                                                                                                                                                                                                                                                                                    | <p>Increasing professional competence.</p>                                                                                                                                       | <p>1. Preparation of necessary training proposals for specialist knowledge in the field of prosecution of corruption crimes and confiscation of property benefits for state prosecutors and judges.<br/>2. Implementation of trainings for judges and state prosecutors.<br/>3. Preparation of analysis and proposals for the employment of appropriate support professionals at the court and the state prosecutor's office.</p>                                                                                                                                                                                                                                          | <p>1. Supreme Court/Supreme State Prosecutor's Office<br/>2. MJ (Judicial Training Centre)<br/>3. Supreme Court/Supreme State Prosecutor's Office</p> |                                            | <p>1. - 3. from 2025 onwards</p>                     | <p>1. Prepared proposal.<br/>2. Number of conducted trainings, number of participants (judges, state prosecutors).<br/>3. Prepared analysis.</p>                                                                                                                                                                                                      |
| EDUCATION | <p>OBJECTIVE 74: Educational institutions must ensure the education and awareness of professional workers and such working conditions that promote their autonomy and strengthen integrity.</p> <p>OBJECTIVE 75: In education, it is necessary to ensure fairness and equality of opportunity both in the education process and in the granting of concessions for the performance of educational and higher education activities.</p> | <p>There are no criteria for the training of training providers in the field of social skills and integrity of professional workers in education and training, further education and training of novice teachers does not contain integrity content, nor is this content mandatory, formal professional training of future professional workers in education and training does not contain content in the field of integrity.</p> | <p>Future professional workers are included in regular study programs to obtain an education, beginner teachers and professional workers are offered education and training.</p> | <p>1. Inclusion of integrity content in education at pedagogical faculties.<br/>2. The training of novice teachers is upgraded with content on the topic of integrity.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>1. Ministry of Education<br/>2. National Education Institute</p>                                                                                   | <p>1. Individual pedagogical faculties</p> | <p>1. 2030<br/>2. from 2025 onwards</p>              | <p>1. Study programs at pedagogical faculties include content from the field of integrity.<br/>2. Training upgraded.</p>                                                                                                                                                                                                                              |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>Non-transparent recruitment procedures in public educational institutions and the risk of conflict of interests in this recruitment - recruitment of acquaintances within local communities, etc.</p>                                                                                                                                                                                                                          | <p>1. Raising awareness of the occurrence of conflicts of interest in employment<br/>2. Upgrading of training materials.</p>                                                     | <p>1. Education Inspectorate and CPC forward typical cases of violations in the field of conflict of interest in employment in education. Typical examples are included in the existing material of the National Education Institute School for Headmasters.<br/>2. On the basis of the upgraded material, training is carried out within the National Education Institute School for Headmasters.</p>                                                                                                                                                                                                                                                                     | <p>1. and 2. National Education Institute - School for headmasters</p>                                                                                | <p>1. Education Inspectorate, CPC</p>      | <p>1. 2025<br/>2. 2026</p>                           | <p>1. Typical examples of violations in the field of conflict of interest in employment in education are created and included in the materials of the School for Headmasters.<br/>2. Number of conducted trainings, number of participants.</p>                                                                                                       |

Abbreviations:

CPC - Commission for the Prevention of Corruption

MPA - Ministry of Public Affairs

MJ - Ministry of Justice

PHI - Public Healthcare Institution

IPCA - Integrity and Prevention of Corruption Act

WPA - Whistleblower Protection Act