



REPUBLIKA E SHQIPËRIË

**THE OPEN GOVERNMENT PARTNERSHIP  
NATIONAL ACTION PLAN FOR ALBANIA  
2020 - 2022**

Open  
Government  
Partnership





*Anti-Corruption*

# Commitments

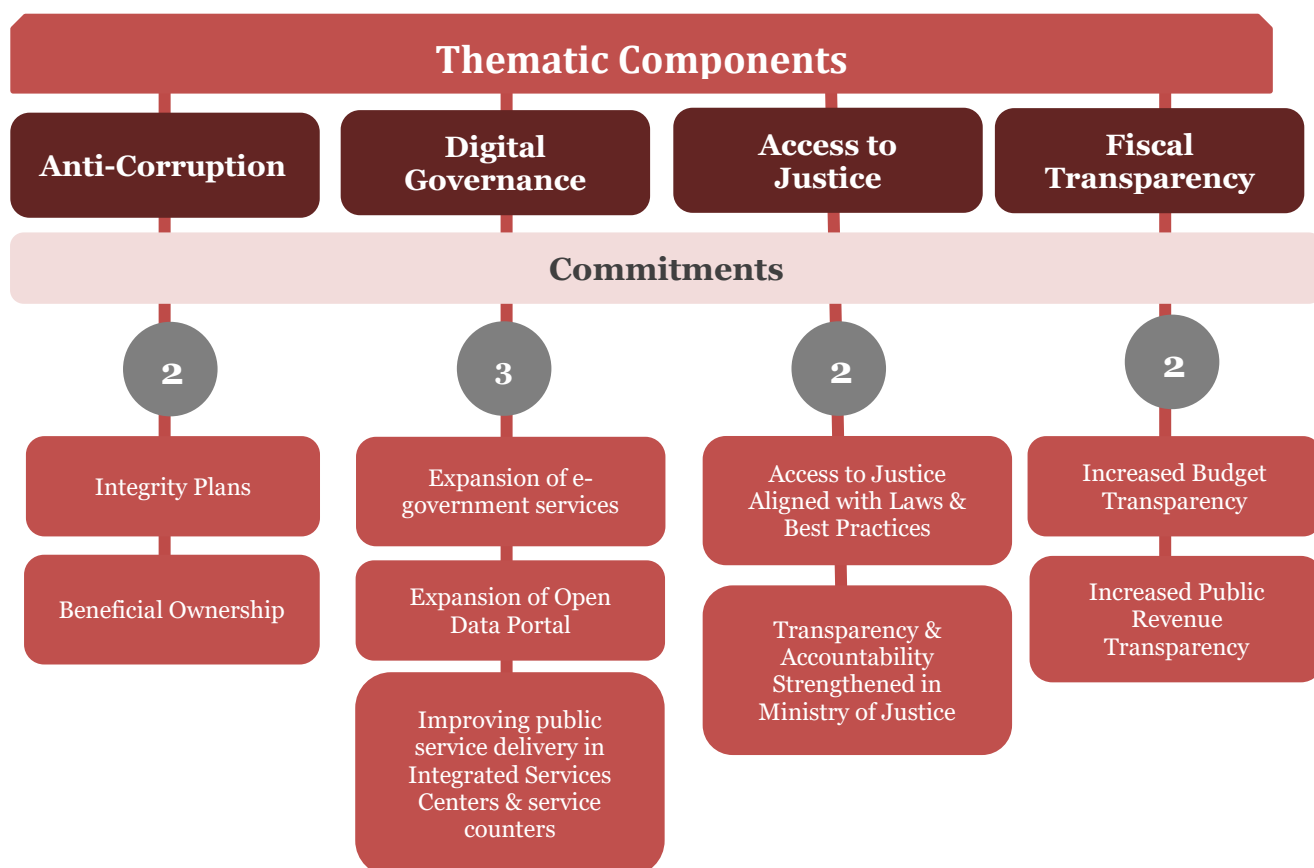
In preparation of Albania's 2020-2022 Open Government Partnership (OGP) Action Plan four policy areas were selected to be the thematic components of the upcoming action plan. Selected based on national and international recommendations for governance and public administration reform in Albania & and the four components are managed by POC in close collaboration with Lead Government Focal Points and centrally coordinated by the OGP Technical Secretariat.

Figure 1: Thematic Components and Lead Focal Point Institutions

Anti-Corruption	<ul style="list-style-type: none"><li>• Ministry of Justice (MoJ)</li><li>• Ministry of Finance and Economy (MoFE)</li></ul>
Digital Governance	<ul style="list-style-type: none"><li>• The National Agency for Information Society (NAIS)</li><li>• Agency for the Delivery of Integrated Services Albania (ADISA)</li></ul>
Access to Justice	<ul style="list-style-type: none"><li>• Ministry of Justice (MoJ)</li></ul>
Fiscal Transparency	<ul style="list-style-type: none"><li>• Ministry of Finance and Economy</li></ul>

Based on government strategies and priorities and feedback and ideas from stakeholder consultations ten strategic objectives representative nine reform commitments were chosen for Albania's 2020-2022 OGP Action Plan. These commitments focus on increasing access to public services and increasing accountability through coordinated approaches to improve the quality and quantity of publically available information. Enabling frameworks and initiatives to promote civic participation and public trust underpin all commitments selected.

Figure 2: Thematic Components and Selected OGP 2020-2022 Commitments



### ***Why is anti-corruption a priority for Albania?***

Tackling corruption is one of the most important objectives of the Albanian government and has been identified by the European Union as one of the five key priorities for the country towards integration with the European Union.

Anti-corruption initiatives and policies underpin the inter-institutional reforms necessary for the improved functioning and efficiency of all public and private institutions. These anti-corruption initiatives and policies will increase the integrity, performance and accountability of institutions, and promoting accountable governance that facilitates equitable and just law enforcement and improved public services for all citizens as well as the implementation of the rights and obligations of citizens in property issues.

### ***Government efforts and progress***

Since 2015 the Albanian government has adopted and implemented government strategies to address corruption, of which the first two national action plans 2015-2017 and 2018-2020 have been implemented. The third Anti-Corruption Action Plan 2020-2023, was approved by the Council of Ministers 1 July 2020 and builds on and strengthens the commitments and strategic objectives from the previous strategies with particular emphasis on enhancing integrity in public institutions to benefit the public interest.

To enhance accountability in the fight against corruption in 2017 the Albanian government established the role of National Coordinator against Corruption (NCAC) to the Ministry of Justice. The MoJ/NCAC oversees the preparation and development of policies, laws and by-laws specifically focused on anti-corruption and facilitates the coordination with stakeholders to collaborate in these processes. Having been designated to the role of NCAC the Ministry of Justice leads the inter-institutional commitment to improve public integrity and promote a culture and transparency and accountability for all civil servants and public officials across all levels of government, but particularly in the most vulnerable and corruption-sensitive sectors.

### ***Collaboration with civil society***

Active civic participation in governance processes is a necessity and a guarantee for maintaining the integrity of governance. The development of both of these anti-corruption mechanisms was done in close cooperation with civil society. The Ministry of Justice/NCAC collaborated with the Institute for Democracy and Mediation Albania<sup>1</sup> (IDM) in co-drafting the “Integrity Risk Assessment Methodology” and the “Integrity Plan of the Ministry of Justice, 2020-2023”, the co-creation process for the latter was guided by an open and consultative drafting process.

Within the framework implementing its good governance agenda the Ministry of Justice/NCAC has partnered with civil society organisations (CSOs) on campaigns to strengthen public education in the fight against corruption. In 2019, Albania held its first edition of the Week of Integrity, an initiative of the International Chamber of Commerce Netherlands, an awareness-raising campaign that focuses on the promotion of ethical behaviour, transparency, accountability, responsibility in business. This Week of Integrity acted as a meeting point for the public sector, the private sector, academia, civil society organizations, international partners, students, central government and local government to promote ethical behaviour across all workplaces, including government and civil society

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<sup>1</sup>The Institute for Democracy and Mediation (IDM) is an Albanian independent non-governmental organization and think tank on governance, security, civil society development and EU integration

organizations. This first edition was joined by 28 partners who presented on their initiatives to promote ethical behaviour, transparency, accountability and responsibility.

### ***Remaining challenges***

The “Addendum to the Second Compliance Report Albania” by the Group of States against Corruption (GRECO) adopted in September 2020 concluded that Albania had implemented satisfactorily or dealt with in a satisfactory manner nine of the ten recommendations contained in the Fourth Round Evaluation Report. However, GRECO’s report emphasized that a vast judicial reform is still ongoing and encourages Albania to prioritize the completion of a comprehensive judicial reform process (regarding the appointment of judges and prosecutors/“magistrates”) in order to fight against corruption within the judiciary.

The implementation of corruption prevention mechanisms will be a continuing priority for Albania. The promotion and integration of anti-corruption reforms will require a significant shift in public administration culture. Developing and implementing integrity plans for all central administration institutions and their subordinates will require substantial political will and technical capacity and commitment within these institutions. Institutional resistance against integrity breaches will need to be strengthened and increased transparency and public access to official information and state activities will require commitment to the development and implementation of timely publication and reporting. Finally, the establishment and on-going administration of a Register of Beneficiary Owners will require substantial political commitment to the prevention of corruption through bribery and money laundry through mandatory transparency and traceability measures.

**Commitment 1****Specific Objective: Integrity Plans**

January 2020 – December 2022

**Lead implementing  
agency/actor****National Coordinator against Corruption, Ministry of Justice****Commitment Description****What is the public problem  
that the commitment will  
address?**

The potential abuse of entrusted power for personal benefit exposes all public institutions in all countries to the risks of corruption during the administration of their duties and responsibilities. Corruption weakens public trust in government, hampers legitimate economic activity, threatens public resources and income, and negatively impacts public administration and service delivery thus poses serious and far reaching risks to country development. In 2019, Albania was ranked 106/180 countries in Transparency International's Corruptions Perceptions Index. Furthermore, according to the 2019 Trust in Governance Opinion Poll of the 2500 Albanians surveyed 87% perceived petty corruption to be either widespread or very widespread, meanwhile 85% perceived grand corruption to be either widespread or very widespread.

As such, addressing corruption in presents a significant challenge that requires measures throughout all levels of the public administration. Since 2017, the Ministry of Justice in its role as National Coordinator against Corruption has lead the government's anti-corruption policy making efforts and the preparation of related laws and bylaws. As the lead responsible public institution for anticorruption the MoJ/National Coordinator against Corruption leads the inter-institutional commitment to ensure a higher performance and culture in the fight against corruption. This inter-institutional commitment focuses on the most vulnerable and corruption-sensitive sectors and strives to promote and ensure an impartial, honest and efficient public administration with civil servants and other public officials with high values, principles and integrity.

**What is the commitment?**

An integrity plan is essentially a risk management plan that focuses on the potential corruption risks an institution may face and consequently can be a powerful anti-corruption instrument. It identifies the primary areas of corruption risk for a particular organization and presents a strategy with concrete mitigation actions, measures and procedures in order to identify these risks and address them such that all levels of the institution operate with integrity. The success of an integrity plan depends both on the soundness of the methodology of its design – how suitable it is to the particular organization, how accountable it requires the individuals of the institution to be, the comprehensiveness of its scope – and its implementation and monitoring process.

	<p>This commitment establishes a framework for the development and implementation of integrity plans across the public administration. It focuses on establishing a methodology and the development and implementation of a leading integrity plan, through the Ministry of Justice, in order to promote not only increased integrity within the Ministry of Justice, but to also lead by example for line ministries and sub-ordinate institutions. The commitment prioritizes structured reporting frameworks and consultative and monitoring mechanisms that promote involvement of and accountability to citizens.</p> <p><b>Objective:</b></p> <p>This commitment aims to strengthen the integrity framework across the public administration such that all government institutions operate with integrity and functionality, in order to prevent corruption both across the board and in their daily activities. The commitment expects that by the end of 2022, in accordance with Inter-Sectoral Strategy against Corruption (ISAC) 2015-2023, all ministries and subordinate ministries will have drafted and begun implementing their integrity plan. The development and implementation of integrity plans that clearly define ethical obligations in the workplace across the public administration aims to build and maintain a work culture of ethical work practices.</p> <p><b>Expected results:</b></p> <ul style="list-style-type: none"><li>• Integrity plan guidance and integrity risk assessment methodology for the central government approved;</li><li>• Ministry of Justice’s Integrity Plan is approved and implemented;</li><li>• Integrity risk assessment conducted in Ministry of Justice subordinate institutions &amp; integrity plans approved;</li><li>• Integrity risk assessment conducted in line ministries&amp; integrity plans approved.</li></ul>
<p><b>How will the commitment contribute to solving the public problem?</b></p>	<p>In cooperation with the Albanian non-governmental governance think thank the Institute for Democracy and Mediation (IDM) the Ministry of Justice/NCAC has co-created and adopted the “Integrity Risk Assessment Methodology in Central Government Institutions” (<b>milestone 1; milestone 3</b>) a guide/methodology on how central administration institutions should assess integrity risk in order to initiate activities to maintain the integrity and performance of public administration employees, at the executive and political level. Workshops will familiarize Ministry of Justice employees with best practices and procedures and train them on the application of assessment frameworks and tools in order to strengthen their technical in identifying, assessing and addressing integrity risks (<b>milestone 2</b>). Through the same cooperation the “Ministry of Justice Integrity Plan 2020-2023” has been drafted through an open and consultative process (<b>milestone 4</b>).</p> <p>A roundtable with public institutions will promote integrity plans and explain the mechanisms and methodology and using the Ministry of Justice’s Integrity Plan as a model document to line ministries and subordinate institutions (<b>milestone 5</b>). Following the consultative methodology developed by the Ministry of Justice subordinate institutions and all central pubic institutions (ministries) will each undergo their own integrity risk assessments to draft their own integrity plans in accordance with their respective areas of responsibility and specific risk factors (<b>milestone 6; milestone 7</b>). Once these plans have</p>

		<p>been approved, ensuring they meet all the guidelines specified in the methodology, an e-bulletin series will be produced to facilitate the transparency of the integrity plans and accountability to its implementation (<b><i>milestone 8</i></b>).</p> <p>To ensure proper implementation of the integrity plans -- from risk identification to risk mitigation -- they will be accompanied by a comprehensive monitoring process that follows a structured monitoring and evaluation framework (<b><i>milestone 9</i></b>). Monitoring of the implementation of the Ministry of Justice's Integrity Plan will be done in consultation with stakeholders and civil society organizations (CSOs) with feedback published and integrated such that the ministry is held accountable to the public as well as to internal systems (<b><i>milestone 10</i></b>). Evaluation reports will be regularly conducted and published in real to be available for public comment (<b><i>milestone 11</i></b>) to then produce and publish the resulting recommendations to improve the implementation process (<b><i>milestone 12</i></b>). This monitoring process will be applied to the implementation of the line ministries and subordinate institutions' integrity plans once they have begun their implementation phase (<b><i>milestone 13</i></b>).</p>				
OGP challenge affected by this measures		Improve public services	Increase efficient management of public Resources	Increase public integrity	Increase corporate accountability	Create a safer community for citizens & civil society
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Why is this commitment relevant to OGP values?	Transparency & Access to Information	<div><ul style="list-style-type: none"><li>Does the idea disclose more information to the public?</li><li>Does the idea improve the quality of information disclosed to the public?</li><li>Does the idea improve accessibility of information to the public?</li><li>Does the idea enable the right to information?</li></ul><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</div> <p>All consultative meetings, round-tables and resulting reports and plans of each ministry and subordinate institutions' integrity plan development process will be published and made publically available.</p> <p>Annual monitoring reports on the implementation of integrity plans will be published for public consumption and will be accompanied with supplementary detailed information to facilitate citizens' comprehension and understanding of the plans.</p>				
	Public Accountability	<div><ul style="list-style-type: none"><li>Does the idea create or improve rules, regulations, and mechanisms to publicly hold government officials answerable to their actions?</li><li>Does the idea make the government accountable to the public and not solely to internal systems?</li></ul><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</div> <p>Monitoring reports will track the progress of the initiative and the implementation of each institution's integrity plan. These will be completed through public consultations and be published for public consumption in order to enable the ability for civil society and citizens to hold institutions answerable and accountable to the progress and achievement their plan's stated commitments.</p>				
	Public & Civic Participation	<div><ul style="list-style-type: none"><li>Does the idea create or improve opportunities, or capabilities for the public to inform or influence decisions?</li><li>Does the idea create or improve the enabling environment for civil society?</li></ul><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</div> <p>The implementation of publically available integrity plans will help to promote public and civic engagement on several levels. These efforts aim to increase public trust not only in the institutions themselves, but towards the process. They work to address the disillusionment of civil society from participating in governance reforms.</p> <p>Firstly, by requiring public institutions to consulate with the public in the design of their integrity plans the commitment will support co-ownership of the process.</p> <p>Secondly, the publication of the plans and inclusion of supplementary information will foster accessibility and citizen awareness and comprehension of the planned reforms that will in turn make citizens more informed and consequently better positioned to hold the institutions accountable.</p>				



		Finally, a collaborative monitoring framework will provide on-going opportunities for public accountability and civic contributions so that citizens can be assured that their contributions and concerns are taken under consideration and applied and therefore feel incentivized to participate and maintain engagement.
	<b>Technology &amp; Innovation</b>	<ul style="list-style-type: none"> <li>• Will technological innovation be used in with one of the other three OGP values to advance participation, transparency or accountability?  <input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</li> </ul> <p>Online publication of reports enable transparency in real time coupled with online opportunities for stakeholder consultation and feedback enable a greater number of citizens to provide participate and provide feedback. Additionally, the use of an e-bulletin will support transparency and accountability on the implementation of integrity plants.</p>

### Milestone Activities

Milestones	Indicators		Responsible Institution / s		New or Continued Idea	Timeframe	
Measurable & verifiable achievements to accomplish this objective	Result Indicators	Output Indicators	Lead Responsible Institution	Supporting / Coordinating Agencies / Institutions	New or continued from 2018-2020 OGP AP	Start Date	End Date

#### Priority Measure 1:

Integrity plans drafted and approved by central government institutions

<b>Milestone 1:</b> Methodology document: Guidance / integrity risk assessment methodology for the central government drafted	Central public administration institutions with better performance, accountability and transparency	Manual (methodology) completed	Ministry of Justice (MoJ)	Civil Society Organizations (CSOs)	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M I 2020	6M I 2020
<b>Milestone 2:</b> Strengthening the capacities of the MoJ technical staff on the identification of integrity risks		Workshops on the identification of work processes/Analysis and assessment of the intensity of integrity risks.	MoJ	CSOs	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M I 2020	6M I 2020
<b>Milestone 3:</b> Approval and Publication of the Integrity Risk Assessment Methodology for the central government.		Manual (methodology) approved	MoJ		<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M II 2020	6M II 2020
<b>Milestone 4:</b> Drafting, consulting, approval and publication of the IP document of the MoJ.		Approval of MoJ IP document	MoJ		<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M II 2020	6M II 2020
<b>Milestone 5:</b> Information and presentation		MoJ Integrity Plan promotion	MoJ	CSOs	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M II 2020	6M II 2020

mechanisms to MoJ and LM subordinate institutions, for the risk assessment process and presentation of the integrity guide		roundtable					
<b>Milestone 6:</b> Integrity risk assessment in MoJ subordinate institutions according to the model developed in MoJ; Integrity plan drafted.		Integrity risk assessment in MoJ subordinate institutions & integrity plan drafted.	MoJ subordinates	MoJ	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M I 2021	6M II 2021
<b>Milestone 7:</b> Integrity risk assessment; drafting, approval of Integrity Plans by all central institutions (ministries).		Ministries have approved IPs	Ministries		<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	Jan. 2022	Dec. 2022
<b>Milestone 8:</b> Increased transparency by public administration institutions on IP (e-bulletin)		No. of bulletins produced / published (2021/2022)	MoJ		<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M I 2021	6M II 2022

### Priority Measure 2:

Comprehensive analysis on the applicability of integrity plans in the Ministry of Justice and line ministries

<b>Milestone 9:</b> Methodology document: instrument on monitoring Integrity Plans in central government institutions		Manual (methodology) monitoring/evaluation of IP implementation, conducted and approved	MoJ	CSOs	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M I 2021	6M I 2021
<b>Milestone 10:</b> Drafting and consulting the monitoring report on the implementation of the IP of MoJ with Stakeholders and CSOs		Stakeholder/CSO consultation calendar established & published.  Stakeholder consultations held.  Stakeholder feedback published & response integrated into the monitoring report.	MoJ	CSOs	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M II 2021	6M II 2021
<b>Milestone 11:</b> Evaluation report		Evaluation reports	MoJ		<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M II 2021	6M II 2022

performed for the implementation of the IP of MoJ is performed every 1 year (2 internal reports/every 6 months) during the time of implementation of the plan		<p>conducted.</p> <p>Evaluation reports published &amp; publically available in real time.</p> <p>Evaluation reports available for public feedback.</p>					
<p><b>Milestone 12:</b></p> <p>Preparation of recommendations based on the findings of the evaluation performed/added transparency to the given recommendations</p>		<p>No. of recommendations drafted for IPs.</p> <p>Recommendations published in real time for public consumption.</p>	MoJ		<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M II 2021	6M II 2022
<p><b>Milestone 13:</b></p> <p>Drafting and consulting the monitoring report on the implementation of the IP of MoJ subordinate with Stakeholders/CSOs through information meetings/workshops</p>		<p>Stakeholder/CSO consultation calendar established &amp; published.</p> <p>Stakeholder consultations held.</p> <p>Stakeholder feedback published &amp; response integrated into the monitoring report.</p>	MoJ	CSOs	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Integrity Plans	6M II 2022	6M II 2022
Contact Information							
Name of responsible person from implementing agency							
Title, Department							
Email and Phone							
Other Actors Involved	State actors involved						

**Commitment 2****Specific Objective: Beneficial Ownership Register****January 2020 – December 2022****Lead implementing  
agency/actor****Ministry of Finance and Economy****Commitment Description****What is the  
public  
problem that  
the  
commitment  
will address?**

A beneficial owner is the real person or real people who own, control or benefit from a legal entity, such as a company or organization. Criminals can use an ‘anonymous owner’ or a ‘nominee’ as owner of a company in order to secretly move, launder and spend money from criminal activity. Often these secret companies are used to pay or receive bribes or engage in other corrupt practices or to avoid taxes.

When open registries require legal entities to disclose the individuals who own or control the legal entity, through direct ownership or indirect ownership through shares for example, money is more easily traceable. Therefore, it becomes more difficult to use legal entities to hide the profits from corruption and crime and therefore, reduces the attractiveness and ease of engaging in such criminal activity.

In Albania only the Law no. 9917/2008 “On the prevention of money laundering and terrorist financing” has included explicit mention of beneficial ownership. The legal entities under the jurisdiction of this law are obligated to identify the beneficial owners of their customers; however, this data has not been recorded in a designated national register. Furthermore, under current legislation legal entities registered in the Republic of Albania are not obligated to identify and register data on their beneficial owners in a designated national register. Thus, there has lacked the legal framework necessary to require by law the disclosure and register of beneficial owners of legal entities. Furthermore, without the adequate establishment of procedures and manner of registration and storage of the beneficial ownership data or the punitive measures for non-registration of beneficial ownership, criminal activity and corrupt practices can more easily be hidden.

**What is the  
commitment?**

This commitment outlines the pathway to establishing a functioning central register of beneficial owners in order to reduce the opportunities for hiding corruption and criminal activity and its profits. Through the development, approval and implementation of the law “On the Register of Beneficial Owners” (the UBO Law) and by-laws that explicitly define beneficial ownership, outline the requirements of legal entities to report to the register and the rules and procedures for the register itself the commitment establishes the legislative basis necessary for an effective beneficial ownership register.

The implementation of the register of beneficial owners will consist of an electronic database held by the National Business Center (NBC). All legal entities required to report and register their beneficial owner information will be obliged to submit information regarding their beneficial owners as outlines by the UBO Law or face financial sanctions for non-compliance. Thus, through this initiative, transparency regarding the real ownership and control of legal entities will be promoted and provided, as well as more data to which the public may have access.

	<p><b>Objective:</b></p> <p>The drafting of the law “On the Register of Beneficial Owners” and the accompanying by-laws through a consultative process with stakeholders aim to establish the manner and procedures of data registration for beneficial ownership that accounts for the technical and operational challenges of identifying beneficial owners in Albania. The implementation of the register through this framework aims to establish a system that promotes transparency, due diligence and ethical practices and severely reduces the opportunities for money laundering, bribery, tax evasion and other forms of corruption.</p> <p><b>Expected results:</b></p> <ul style="list-style-type: none"><li>• Approval of the draft law ‘Register of Beneficial Ownership’;</li><li>• Drafting and approval of the bylaws:<ul style="list-style-type: none"><li>-“On determining the manner and procedures of data registration for beneficial ownership, as well as the notification from the competent state authorities and from the obligated subjects”;</li><li>-“On determining the rules for the functioning of the Register of Beneficial Ownership, on the way of communication in electronic form and exchange of data between the National Business Center and responsible state bodies, as well as for the manner and terms of communication between the Register of Beneficial Ownership, the Trade Register and the Register of Non-Profit Organizations”</li></ul></li><li>• Implementation of the Law on the Register of Beneficial Ownership;</li><li>• Creation of the Register of Beneficial Ownership by the end of 2021.</li></ul>
<p><b>How will the commitment contribute to solving the public problem?</b></p>	<p>In order to meet the 'Beneficiary Ownership' objective, MoFE efforts have focused on adapting the necessary legal basis. The Law no. 112/2020 "On the register of beneficial ownership"(<b>milestone 1</b>), fulfils one of the recommendations of MONEYVAL. The law partially approximates Directive (EU) 2015/849 of the European Parliament and of the Council, dated 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC. This law regulates the definition of the beneficial ownership; the obligated entities which must register the beneficial owners; the creation, functioning and administration of the Register of Beneficiary Ownership; the procedure and the manner of registration and storage of the registered data of the beneficial ownership as well as the punitive measures in case of non-registration of the beneficial ownership.</p> <p>More specifically, this law applies to the reporting entities, legal entities registered in the Republic of Albania according to the provisions set in the law. The register will be set up and managed by the National Business Center and will be accessed only by the persons authorized to represent the reporting entity and by the competent state authorities. Any person wishing to obtain information from the register that is not freely accessible and public can only do so if they are able to prove that they have a legitimate legal interest in obtaining this information.</p> <p>Another task derived by legislative base adaption is the drafting of bylaws, which will be realized with the financial and technical assistance of GIZ, specifically: the DCM “On determining the manner and procedures of data registration for beneficial ownership, as well as the notification from the competent state authorities and from the obligated subjects” (<b>milestone 2</b>) and the DCM “On determining the rules for the functioning of the Register of Beneficial Ownership, on the way of communication in electronic form and exchange of data between the National Business Center and responsible state bodies, as well as for the manner and terms of communication between the Register of Beneficiary Owners, the Trade Register</p>

		and the Register of Non-Profit Organizations” ( <b><i>milestone: 3</i></b> ) , are in the drafting process.					
		Finally, the Ministry of Finance and Economy and the National Agency for the Information Society must establish the Register of Beneficial Ownership until 2021 ( <b><i>milestone 4</i></b> ).					
OGP challenge affected by this measures		Improve public services	Increase efficient management of public resources	Increase public integrity	Increase corporate accountability	Create a safer community for citizens & civil society	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Why is this commitment relevant to OGP values?	Transparency & Access to Information	<div><ul style="list-style-type: none"><li>Does the idea disclose more information to the public?</li><li>Does the idea improve the quality of information disclosed to the public?</li><li>Does the idea improve accessibility of information to the public?</li><li>Does the idea enable the right to information?</li></ul><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</div> <p>The creation of the Register for Beneficial Ownership is foreseen to function as a state electronic database, in which the data of the beneficial ownership of the subjects obligated to report is registered, which collects in real time the data registered in the respective state registers, administered by the relevant state institutions, and serves as an official electronic archive, thus ensuring transparency in the field of beneficial owners.</p>					
	Public Accountability	<div><ul style="list-style-type: none"><li>Does the idea create or improve rules, regulations, and mechanisms to publicly hold government officials answerable to their actions?</li><li>Does the idea make the government accountable to the public and not solely to internal systems?</li></ul><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</div> <p>By ensuring transparency in the field of beneficial ownership and the definition of the institutions in charge of data registration and their administration, as well as all other institutions responsible for fulfilling of the resulting legal obligations, aims to improve public accountability.</p>					
	Public & Civil Participation	<div><ul style="list-style-type: none"><li>Does the idea create or improve opportunities, or capabilities for the public to inform or influence decisions?</li><li>Does the idea create or improve the enabling environment for civil society?</li></ul><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</div> <p>Any person may obtain information about the data recorded in the register, which is not freely accessible and public, only if he proves that he has a legitimate interest in obtaining this information.</p>					
	Technology & Innovation	<div><ul style="list-style-type: none"><li>Will technological innovation be used in with one of the other three OGP values to advance participation, transparency or accountability?</li></ul><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</div> <p>The use of an electronic register provides a means to ensure traceability and transparency and a verifiable record to hold public institutions responsible for fulfilling their obligations for the maintenance and continuous and accurate update of the register.</p>					
Milestone Activities							
Milestones	Indicators		Responsible Institution / s		New or Continued Idea	Timeframe	
Measurable & verifiable achievements to accomplish this objective	Result Indicators	Output Indicators	Lead Responsible Institution	Supporting / Coordinating Agencies / Institutions	New or continued from 2018-2020 OGP AP	Start Date	End Date
Priority Measure 1: Approval of the draft law “Register of Beneficial Ownership”							
Milestone 1: Approval of the draft law “On the register of beneficial ownership”	Drafting, consulting with stakeholders and following the procedures of the	No. of working group meetings.  Law approved	Ministry of Finance and Economy (MoFE)	Line Ministries	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Beneficiary Owners	Jan. 2020	Dec. 2020

	approval of the draft law						
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### **Priority Measure 2:**

#### Implementation of the Law on the Register of Beneficial Ownership

<b>Milestone 2:</b> Drafting and approval of bylaw: - DCM “On determining the manner and procedures of data registration for beneficial ownership, as well as the notification from the competent state authorities and from the obligated subjects”	Drafting, consulting with stakeholders and following the procedures of the approval of the draft law	Adopted bylaw	MoFE	Line Ministries	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Beneficiary Owners	Jan. 2020	Dec. 2021
<b>Milestone 3:</b> Drafting and approval of bylaw: DCM “On determining the rules for the functioning of the Register of Beneficial Ownership, on the way of communication in electronic form and exchange of data between the National Business Center and responsible state bodies, as well as for the manner and terms of communication between the Register of Beneficial Ownership, the Trade Register and the Register of Non-Profit Organizations”	Drafting, consulting with stakeholders and following the procedures of the approval of the draft law	Adopted bylaw	MoFE	Line Ministries	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Beneficiary Owners	Jan. 2021	Dec. 2021
<b>Milestone 4:</b> Creation of the register of Beneficial Ownership.	Drafting, consulting with stakeholders and following the procedures of the approval of the draft law	Register of beneficial ownership created	MoFE	NBC, Line Ministries	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Beneficiary Owners	Jan. 2021	Dec. 2021

### Contact Information

Name of responsible person from implementing agency		
Title, Department		
Email and Phone		
Other Actors Involved	State actors involved	<b>Other government agencies involved:</b> National Business Center