

Annex 1 [Note verbale reference: CU 2023/225/DTA/CEB/CSS]

“Links between corruption and other forms of crime”

States parties are invited to provide relevant information in line with paragraph 22 of resolution 9/1¹, in which the Conference:

*Encourage[d] States parties to further explore and enhance their knowledge of the **links between corruption and other forms of crime, in particular organized crime and economic crime, including money-laundering, including during times of emergencies and crisis response and recovery**, to better strengthen integrity, transparency and accountability, and invite[d] the secretariat, within existing resources, to compile a report in this regard on the voluntary information provided by States parties and submit it to the Conference at its tenth session [emphasis added].*

States parties may wish to take a broad view of “other forms of crime” when responding to this questionnaire, which may include all forms of organized crime and economic crime, as well as other crime, among others.

Contact Information

Please provide contact details for potential follow-up questions. Contact details will be treated confidentially.

Country: Republic of Moldova

Government Agency: National Anticorruption Centre

Department: International Cooperation Directorate

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¹ In July 2022, the secretariat sent out note verbale CU 2022/264(A)/DTA/CEB/CSS inviting States parties to provide information on good practices and challenges concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery, in line with paragraphs 22 and 23 of resolution 9/1 entitled “Sharm el-Sheikh declaration on strengthening international cooperation in the prevention of and fight against corruption during times of emergencies and crisis response and recovery”. As at 11 October 2022, the secretariat had received responses from 23 States parties, which were analysed in a note prepared by the secretariat, entitled “Best practices and challenges concerning international cooperation in combating corruption during times of emergencies and crisis response and recovery, and efforts to further explore and enhance knowledge of the links between corruption and other forms of crime” [CAC/COSP/EG.1/2022/CRP.1]. Responses were received from the following States parties: Australia, Bahrain, Belarus, Brazil, Bulgaria, Chad, Chile, Egypt, El Salvador, European Union, France, Georgia, Italy, Mexico, , Myanmar, Panama, Portugal, Republic of Moldova, Romania, Saudi Arabia, Spain, Türkiye and the United States of America.

Questionnaire

Corruption may contribute to impunity for other types of crime by providing the leverage to facilitate and execute them, and to make them invisible, and often exacerbates those crimes through the involvement of powerful elites and individuals. Corrupt behaviour (such as violating duties, accepting or transferring bribes, and facilitating transactions, as well as ignoring or failing to follow-up on information that a crime may be taking place) may serve an enabler of other crimes by allowing for the enrichment of criminals and incentivizing individuals in the public and private sector to facilitate their operation. Other crimes can therefore flourish and in turn provide a basis for a wide range of corrupt behaviour.

This questionnaire is structured into two parts: Part 1 considers steps taken to understand the links between corruption and other forms of crime, while Part 2 focuses on the measures aimed at responding to corruption linked with other forms of crime.

I. Understanding the links between corruption and other forms of crime

1. Has your country undertaken any analyses or assessments to better understand the interlinkages between corruption and other forms of crime, including typologies of crime and how corruption may be used to facilitate and enable organized crime, economic and other crime, and vice versa? **YES/NO.**
 - a. If **YES**, was such analysis carried out through formal risk assessments or other methods? Please describe.

In the Republic of Moldova, the Integrity Law adopted in 2017 established the integrity control mechanism in the public sector, which is divided into 2 components

- ***Integrity control ensured within the public entity***, involving: institutional corruption risk management, which is provided by the heads of public entities and involves internal corruption risk assessment, which is documented in a special register and involves identifying, assessing, controlling, monitoring and reporting corruption risks. Fraud and corruption risk management is a pro-active tool to prevent fraud and corruption manifestations in the activity of a public entity, as well as to ensure a climate of institutional and professional integrity by assessing vulnerabilities and implementing anti-corruption measures. The responsibility of the head of the public entity to ensure effective management of fraud and corruption risks derives from the provisions of the Law on Integrity, no.82/25.05.2017, the Law on Public Internal Financial Control, no.229/23.09.2010 and the National Standards for Internal Control in the Public Sector, approved by the Order of the Ministry of Finance no.189/05.11.2015, including SNCI 1 "Ethics and Integrity" and NSIC 9 "Risk Management".

- ***Integrity control by the National Anti-Corruption Centre***. The NAC as an anti-corruption authority is responsible for the external assessment of corruption risks, which is carried out in accordance with the Law on the assessment of institutional integrity no.325/2013, as well as the Methodology for the identification of corruption risks in public entities, the identification of public agents exposed to these risks and the analysis of the risk factors that generate them, which can be found on the Centre's website. According to the Law on Institutional Integrity Assessment, all public sector entities, including state and municipal enterprises, may be subject to institutional integrity

assessment. It should be noted that this tool identifies corruption risks that may intersect/associate, including encouraging or enabling the misappropriation or use of public resources for the benefit of groups of persons who may be affiliated with interest groups and may involve dubious procurement or non-transparent public-private partnerships, etc.

The institution assessing institutional integrity shall prepare a report on the results of the institutional integrity assessment, containing information on: the initiator and stages of the institutional integrity assessment; corruption risks affecting the activities of the public entity, including typical and specific corruption and fraud risks; findings on the integrity climate of the public entity; integrity incidents admitted by public officials; results of the professional integrity testing of public officials, level of impairment of fundamental human rights and freedoms. Thus, the assessment of institutional integrity ends with the preparation of a report, which includes a detailed analysis of the factors and risks of corruption identified, as well as the recommendations formulated by the NAC experts to remove the deficiencies found. The report is submitted both to the evaluated institution and to the superior entity.

The head of the evaluated entity is obliged within 30 days of receipt of the report to adopt an Integrity Plan incorporating the recommendations made by the Centre's experts.

2. Please list the main typologies of other crime that have interlinkages with corruption in your country.

Drug trafficking

Money-laundering

Human trafficking

Migrant smuggling

Firearms trafficking

Crimes that affect the environment

Trafficking in cultural property

Cybercrime

Terrorism

Other forms of economic crime, organized crime or other crime with links to corruption (**please list**)

It should be noted that typical corruption risks identified in the institutional integrity assessment process may intersect/associate with some specific corruption risks related to related areas, namely: The risk of favouritism or tax evasion as a result of ineffective controls or lack of controls, where public officials exercising these functions admit to corruption, including undue influence; the risk of fraudulent tenders; misuse and

embezzlement of funds from external/internal sources; favouring certain categories of persons or economic agents by circumventing certain types of controls; the risk of false public documents, as well as illicit promotion of private/group interests, etc.

It should be mentioned that according to *The methodology for identifying corruption risks in public entities, identifying public officials exposed to these risks and analysing the risk factors that generate them*, the following are assigned to the category of typical corruption risks: active corruption; bribery; passive corruption; taking bribes; influence peddling ; abuse of service; exceeding official duties; conflict of interest and/or favouritism; illicit enrichment; forgery of public documents; false accounting; misuse of funds and/or assets; embezzlement of funds and/or assets; fraudulent obtaining of funds from external assistance; improper influence; violation of the rules on intolerance of incidents of integrity; failure to comply with the gifts regime; violation of the limitations on publicity in public service; violation of incompatibilities in public service; violation of restrictions in the hierarchy in public service; leakage of information with limited accessibility.

The category of specific risks of corruption is assigned other risks of corruption than those mentioned above or which manifest themselves in addition to those mentioned above in the specific circumstances, conditions and characteristics of the sector in which the public entity operates or by virtue of the operational processes carried out within the public entity and which constitute violations of a criminal, misdemeanour and disciplinary nature affecting the climate of institutional integrity (e.g.: rigging of public procurement, money laundering and others). At the same time, the corruption risks identified are subject to preventive analysis in terms of how they affect fundamental human rights and freedoms. Similarly, the identified corruption risks are analysed in terms of the risk factors that determine, allow or encourage corruption within the public entity

3. Please provide examples of corruption linked to these other crimes.

It should be noted that according to LAW 325/2013 the institution assessing institutional integrity prepares a report on the results of the assessment of institutional integrity, which contains information on: the initiator and stages of the institutional integrity assessment; corruption risks affecting the activities of the public entity; findings on the integrity climate of the public entity; integrity incidents admitted by public agents; the results of the professional integrity testing of public officials, with a description of the testing activities carried out in accordance with the professional integrity testing plan, the behaviour and actions of public officials during the testing; the level of impairment of fundamental human rights and freedoms by manifestations of corruption within the public entity; the minimum recommendations/certifications for the removal of corruption risks.

The reports on the results of the institutional integrity assessment describe in detail the risk factors and typical and specific corruption risks identified in the assessment process. The de-personalised version of the report on the results of the institutional integrity assessment shall be made public on the official website of the institution assessing institutional integrity at the same time as the full version of the report is sent to the assessed entity.

The reports on the results of the assessment can be accessed on the NAC website [.](https://cna.md/lib.php?l=ro&idc=83&t=/Evaluarea-integritatii-institutionale/Rapoarte-de-evaluare/Rapoarte-privind-rezultatele-evaluarii&)

An example of corruption related to these offences is the criminal case on money laundering, which targeted a network of fraudsters consisting of 24 persons, who allegedly robbed hundreds of citizens of the Republic of Moldova, the Russian Federation and Kazakhstan of money through a stock exchange trading consultancy company. Over the past two years, the company, registered in Cyprus but with a representative office in Chisinau, allegedly fraudulently collected more than €1.5 million from its clients. Investigations and inquiries into the case established that the company's representatives were offering consultancy services to potential investors on the financial market, suggesting profitable transactions and investments. They identified victims in former CIS countries, presented themselves as employees of the Moldovan branch of an existing Russian company, well-known on the financial market, and offered expertise, analysis and consulting services. The victims were persuaded to make investments of tens and hundreds of thousands of euros, including on the Forex market, and after depositing the money on accounts managed by the members of the group, they found out that the transactions failed and the investments were unprofitable. To erase the traces of the crime, the suspects stopped communicating with the victims, changing their phone numbers and deleting all the platforms they contacted. As a result, 23 people were detained on suspicion of large-scale money laundering. Several luxury cars belonging to the suspects were seized to ensure the recovery of the damage.

Please elaborate if you have or had any cases of the following in your country:

A. Corruption as an enabler of crime

- a. Cases of public officials abusing their office to facilitate criminal activity or to protect certain criminal individuals and entities – or to gain support from them – for example, by providing funding or protection or to gain and control public resources?

Here we can mention the criminal case initiated on the financing of political parties or electoral campaigns, the violation of the management of the financial means of political parties by a former member of Parliament, who accepted and directed the receipt from an organized criminal group of funds in the amount of 9 752 000 lei, which he distributed to the entire staff of the political party to which he belonged, in order to make electoral agitation and attract as many voters as possible to his side.

- b. Cases of corruption being used to facilitate other types of crime, such as trafficking in persons, illicit trade or smuggling of drugs across borders? For example, have any cases involved the following:
- the issuance of permits, licenses, visas or documents for border crossings
 - the purchasing of firearms
 - bribery of border agents
 - falsification of data in public registries
 - other

A relevant case is the documentation of employees of the Border Police Sector "Chisinau International Airport" of the General Inspectorate of the Border Police of the MIA, who initiated a scheme whereby under the pretext of a suspicion of

possession and presentation of the PCR test "Covid-19" with signs of falsification, by extortion they demanded, accepted and received from citizens crossing the border of the Republic of Moldova on the way "OUT" money in amounts ranging from 50-100 euros, in order not to register and document the case in accordance with the legislation in force. In fact, **56 criminal cases** have been initiated on the above-mentioned issues, as well as **8 contravention cases** under Art. 315 CC (*receipt of unlawful reward or material benefit*) and Art. 105 CC (*medical embezzlement of the owner's assets*).

- c. Cases of corruption in public procurement to advance the interests of public officials and their associates? Cases of officials giving preferred access to contracts and tenders to their associates in cases involving other crimes?

A relevant case related to public procurement can serve to document the illegal actions of the head of a municipal catering company in Chisinau and three economic agents, within the framework of 5 files, initiated on passive and active corruption. They are suspected of having acted in complicity, rigging contracts for the purchase of food products for schools and kindergartens in the capital, thus causing particularly large damage to the local budget. It was found that the official was concluding contracts with economic agents for the supply of food for schools and pre-schools, and that they were to offer him a commission from each contract signed as a reward. He allegedly suggested to his accomplices that they should fictitiously increase the purchase price of the food and give the difference to him. According to the information obtained, the commission charged on each contract amounted to up to 25 per cent, and the money was passed on in the boss's office, with amounts ranging from 5000 lei to 18 thousand lei.

- d. Cases of the protection of victims of crime and corruption being impeded by corruption involving public officials or persons in the private sector?

B. Corruption and crime linked to political patronage

- a. Criminal individuals and entities attempting to use corruption to obtain access to political leadership or to gain power and influence, such as through:

- ✓ political party financing
- ✓ trading in influence
- ✓ other

- b. Cases of crime and corruption being used to attempt to influence or disrupt elections?

- Here we can also mention the criminal case initiated on the **financing of political parties** or electoral campaigns, the violation of the management of the financial means of political parties by a member of the Parliament of the Republic of Moldova, who accepted and directed the receipt from an organized criminal group of funds in the amount of 9 752 000 lei, which he distributed to the entire staff of the political party he led and to which he belonged, in order to make electoral agitation and attract as many voters as possible to his side.
- - Criminal case initiated on the fact of falsifying the report on the financial management of a political party for the first half of 2022 with the intention of

concealing the volume of financial means accumulated and the volume of means used, as well as the use of undeclared funds.

- c. Cases of criminal involvement, including through the use of corruption, to attempt to influence appointments of public officials to build dependency?

C. Corruption to make organized and other crime invisible

- a. Cases of criminals and their associates using proceeds of crime and corruption for personal enrichment and to conceal the origin of the crimes and for money-laundering? In particular, cases of concealment of ownership being used to facilitate corruption and other forms of crime?
- b. Cases of corruption being used to impede investigations, prosecutions and adjudications of organized and other crime, such as through bribery or allocation of political and other favors to law enforcement and judicial officers? Are there cases of corruption linked to organized and other crime not being pursued by the authorities ('blind eye')?

Criminal case initiated under Article 326 paragraph (1) of the Criminal Code, on the fact of committing the crime of influence peddling, committed by a natural person, acting out of material interest, claiming to have influence over the prosecutor of the case within the Prosecutor's Office of the Municipality of Bucharest. Chisinau, in charge of the criminal case involving another person, in order to make him perform actions in the exercise of his office, manifested by the adoption of a decision to discontinue criminal proceedings and to close the criminal case against him, demanded and received money not due to him, in the amount of 4000 euros.

- c. Cases of individuals and entities using corruption and other crimes to generate the funds needed to buy protection from the police? Cases of corruption in law enforcement authorities used to shield organized crime?
 - d. Cases of law enforcement being impeded due to a lack of information and data, as well as reporting of crimes related to corruption?
4. Has your country collected data or statistics to track and/or analyze trends related to the links between corruption and the types of crime outlined in Question 2 above?

YES/NO

The institutional integrity assessment process examines trends in the links between corruption risks and other risks related to other types of related crimes. Thus, criminal cases filed, contraventions committed, convictions, ECHR convictions, and disciplinary offences admitted by public officials in the entities assessed, including sanctions applied, are subject to analysis.

- a. Are these data analysed and used systematically, such as in prevention and investigations or prosecutions? **YES/NO**.

In the institutional integrity assessment processes, i.e. in the description of integrity improprieties admitted by public officials within the public entities subject to the institutional integrity assessment, information that is included in the assessment reports.

- b. Please describe any methodologies used for strengthening measurement and terminological clarity, and achieving a deeper understanding of the different contexts (e.g. in times of peace or in emergencies or conflict situations) and sectors (e.g. law enforcement, border crossing, immigration, intelligence and security, procurement), as well as any corruption or organized crime threat assessments that take into account the interlinkages between corruption and other forms of crime.

It should be noted that according to the methodological aspects set out in Law No.325/2013 on the assessment of institutional integrity, as well as based on the Methodology for identifying corruption risks in public entities, identifying public officials exposed to these risks and analyzing the risk factors that generate them, approved by Order of the Director of the NAC No.50 of 20.03. 2018, in the process of institutional integrity assessment, integrity incidents/disciplinary misconduct are analyzed and described, which play an essential role in the corruption risk assessment process as they provide some important information such as: the type of event constituting the integrity incident/disciplinary misconduct; the sector of activity in which the integrity incident/disciplinary misconduct occurred and the position of the person who committed the act; the state of facts and the modus operandi; the applicable legislative framework and the internal procedures within the unit relevant to the incident analysed; the causes of the integrity incident/disciplinary misconduct; the application of disciplinary, administrative or, where appropriate, criminal sanctions; the effects of the integrity incident/disciplinary misconduct on the employment relationship of the person who committed the integrity incident; the impact of the integrity incident/disciplinary misconduct on the work or image of the institution.

Additionally in the evaluation process they are analysed:

- individual risk factors that may motivate public officials to admit to corruption and act contrary to the climate of institutional integrity, attributed to: lack of professional integrity; insufficient professional training; inadequate supervision or job analysis of the public official or specific duties; pressures within the work environment; inadequate relations with clients; omissions in the declaration of assets and personal interests; perceptions of discrimination (unfairness) in the workplace.

5. Has your country collected data or statistics to track and/or analyse trends concerning international cooperation in this regard? **YES/NO.**
 - a. Please elaborate and share any findings with regard to the good practices and challenges in international cooperation with regard to countering corruption as it relates to other forms of crime
6. Has your country taken any steps at national, regional or local levels to better understand and study the linkages between corruption and other crimes, such as criminological research, training or awareness raising? **YES/NO.**

- a. If **YES**, please elaborate, providing examples.

Exchanges of experience and best practices have taken place at the national level, as well as between similar entities of different countries, in order to maintain a professional climate of the Directorate's employees, in terms of detecting and combating corruption, corruption-related acts and acts of corrupt behaviour.

7. Which aspects of corruption as it relates to other forms of crime do you consider require further research, and what are the gaps in knowledge or understanding that, if addressed, could facilitate countering these crimes?

Given the fact that the Republic of Moldova has concluded an association agreement with the European Union, which presumes a more active financing of national development projects, we consider it relevant to study and develop a common mechanism for exchanging information and best practices with other countries in order to prevent and combat embezzlement and misappropriation of European Union funds.

II. Measures aimed at responding to corruption linked with other forms of crime

8. Has your government adopted or utilized any measures at national, regional or local levels aimed at **preventing** corruption linked with other forms of crime? YES/NO.

- a. If **YES**, please elaborate. *Measures may include:*

- safeguards in specific sectors (e.g. law enforcement, border crossing, immigration, intelligence and security, procurement, local officials)
- development of targeted strategies, policies, action plans at national or sectoral level specifically addressing the links between corruption and other crime
- establishment of dedicated institutional frameworks
- specific rules, codes of conduct, or standards of transparency and integrity for public officials who are most exposed to the risk of being involved in crime and corruption
- systems for the disclosure of assets and private interests
- control mechanisms, such as internal approval systems to avoid having one-to-one meetings
- controls on issuances of visas, work permits, firearms licenses
- the use of information and communication technology (ICT) based tools to prevent (or detect) such crimes
- awareness raising and prevention measures for public officials that are vulnerable to corruption and other forms of crime
- other

The Integrity Law No. 82 of 2017 established institutional integrity measures aimed at cultivating a climate of institutional integrity, namely:

- a) hiring and promotion of civil servants on the basis of merit and professional integrity;
- (b) compliance with the legal regime of incompatibilities, restrictions in the hierarchy and advertising limitations;

- c) compliance with the legal regime governing the declaration of assets and personal interests;
- d) compliance with the legal regime governing conflicts of interest;
- e) non-admission of favoritism;
- f) compliance with the legal rules on gifts;
- g) non-admission, denunciation and treatment of improper influence;
- h) non-admission, denunciation and protection of whistleblowers;
- i) intolerance of integrity incidents;
- j) ensuring transparency in decision-making;
- k) ensuring access to information of public interest;
- l) transparent and accountable management of public assets, reimbursable and non-reimbursable funds;
- m) compliance with ethical and professional standards;
- n) compliance with the regime of restrictions and limitations in relation to the termination of mandate, employment or service relationships and the migration of public officials to the private sector ("pantuf-laflaj").

The responsibility for cultivating institutional integrity in public entities rests with the head and each public official in these entities.

Failure to take these measures leads to the undermining of the climate of institutional integrity and integrity in the public sector, the emergence of corruption, damage to the public interest, and triggers integrity control measures in the public sector by the responsible anti-corruption authorities or other authorities with specific competences, as well as the liability of the heads of public entities and public officials.

At the same time, it should be noted that failure to carry out measures to ensure institutional integrity in the manner established by the Law on Integrity and the special legislation governing the activity of various categories of entities and public agents entails disciplinary liability, regardless of the occurrence of other forms of legal liability (contravention, criminal).

The Law on Integrity also provides for integrity control measures in the public sector. Thus, according to the law, the effectiveness of the cultivation of institutional and professional integrity is subject to checks by the heads of public entities, anti-corruption authorities, civil society and the media.

Thus, the heads of public entities are responsible for implementing the following integrity control measures in the public sector:

- a) avoiding corruption risks in the process of drafting legislative, regulatory and departmental acts (future risks);
- b) corruption risk management (existing risks).

The National Anti-Corruption Centre is responsible for implementing the following integrity control measures in the public sector:

- (a) anti-corruption expertise of draft legislation;
- b) institutional integrity assessment, including professional integrity testing and management of the record of professional integrity of public officials under the terms of Law No 325/2013 on institutional integrity assessment.

The National Integrity Authority is responsible for implementing the following integrity control measures in the public sector:

- a) control of declarations of assets and personal interests;
- b) control of compliance with the legal regime of conflicts of interest;
- c) control of compliance with the legal regime of incompatibilities, restrictions and limitations.

The Intelligence and Security Service is responsible for implementing the following integrity control measures in the public sector:

- a) verification of holders and candidates for public office, in accordance with Law No 271/2008 on the verification of holders and candidates for public office;
- b) professional integrity testing of its own public officials and those of the National Anti-Corruption Centre, as well as the management of professional integrity records in relation to them.

Civil society and the media exercise civic engagement and public scrutiny over all areas of public interest, in particular by:

- (a) participation in the decision-making processes of public entities;
- b) ensuring access to information, requesting official information held by public entities and properly informing society on matters of public interest;
- c) preparing and publishing articles, studies, analyses, surveys, monitoring, reports and other types of information on the phenomenon of corruption, corruption risks, manifestations of corruption, incidents of integrity in public entities, national, sectoral and institutional policies to promote integrity in the public sector.

At the same time, according to the Integrity Law, integrity control within the public entity is carried out through the following actions:

- Eliminating corruption risks in the process of drafting acts. Thus, the head of the public entity and public officials responsible for drafting legislative, normative and departmental acts are obliged not to admit and exclude factors that lead to the emergence of corruption risks, promotion of private interests to the detriment of the public interest and harm to the legitimate interests of individuals and/or harm to the public interest in the process of drafting acts;
- Implementation of institutional corruption risk management, which is a process carried out within the public entity through which internal corruption risk assessment takes place in order to identify and manage corruption risks related to professional activity. Thus, the head of the public entity is responsible for ensuring the management of corruption risks in the context of the implementation of the standards of ethics and professional integrity, under the terms of the Law no.229/2010 on internal public financial control. The process of corruption risk management in the public entity shall be documented in a special register, which includes: description of the vulnerable activity/specific activity objective of the public entity; corruption risk that prevents the achievement of the activity/specific objective; value of the risk (severity/importance of the risk); reaction to the risk and action of the public entity; responsible for the action; deadline/period of implementation of the action.

The Integrity Law provides that if public officials encounter difficulties in implementing political or institutional integrity assurance measures and integrity control measures in

the public sector, the heads of public entities may take the following integrity-enhancing measures, as appropriate:

- (a) conducting training, awareness-raising activities for public officials or citizens;
- (b) developing and implementing guidelines, methodologies, etc;
- c) adopting and implementing integrity plans.

Public officials may request the application of integrity enhancing measures and are obliged to comply with the measures applied within the public entity.

At the request of the heads of public entities and public officials, the National Anti-Corruption Centre, the competent authorities and, where appropriate, civil society, the media shall provide the necessary support to public entities to strengthen their integrity. The National Anti-Corruption Centre, the competent authorities, representatives of civil society and the media may propose to public entities support to strengthen their integrity, granting it with the consent of the heads of the given entities. Public awareness campaigns for citizens, guides and methodologies for citizens on sensitive issues for the integrity of public officials may be initiated and disseminated by the National Anti-Corruption Centre, competent authorities, civil society representatives and the media without the consent of the public entities.

The Integrity Act includes measures to ensure integrity in the private sector in dealing with the public sector:

Thus, the climate of business integrity in dealing with the public sector is cultivated through: compliance with public procurement procedures; compliance with advertising limitations set for public agents; compliance with restrictions and limitations set for former public agents; compliance with business ethics rules; implementation of internal control systems; transparency of shareholders, founders, directors and beneficial owners of business organizations; transparency of private sector dealings with the state.

Responsibility for cultivating a climate of business integrity rests with the management of business organisations. Failure to take the above measures can lead to a compromised climate of integrity in the private sector and, where appropriate, in the public sector, the emergence of corruption and damage to the public interest.

In this context, it should be noted that the Integrity Act regulates that lack of integrity in the public and private sector leads to the commission of corruption and related acts and entails disciplinary, civil, misdemeanor or criminal liability, as appropriate.

The responsibility for the detection and examination of manifestations of corruption lies with the Anti-Corruption Prosecutor's Office, the National Anti-Corruption Centre, the National Integrity Authority and the bodies of the Ministry of Internal Affairs in accordance with the provisions of the Code of Criminal Procedure and the Code of Offences

9. Has your government adopted or utilized any measures aimed at **detecting, investigating and prosecuting** corruption linked with other forms of crime? **YES/NO**.

a. If **YES**, please elaborate. *Measures may include:*

- ✓ legislation criminalizing all forms of corruption related to other types of crime

- ✓ legislation providing for the liability of legal persons for their role in corruption linked to other forms of crime
- ✓ measures to identify beneficial owners of legal persons
- ✓ specialized investigative techniques
- ✓ strengthened institutional frameworks, including the establishment of dedicated bodies (such as those mandated to identify links between corruption and other crime), task forces or coordination mechanisms between authorities responsible for corruption and other crime
- ✓ capacity-building, including targeted training and peer-learning for relevant authorities
- ✓ measures to enable the identification, confiscation, tracing or seizure (and, where relevant, return) of assets that are proceeds of corruption-related crimes
- ✓ mechanisms to address the role of professional gatekeepers (*i.e.* financial, legal, accounting or other relevant professionals) in the transfer of proceeds of corruption and other crime
- ✓ measures aimed at encouraging the protection or participation of actors outside the public sector, including:
 - ✓ reporting mechanisms, legal protections and incentives aimed at encouraging persons to report corruption and other crimes
 - ✓ measures to protect victims, witnesses, and cooperating offenders
 - ✓ measures aimed at ensuring the investigation and prosecution of acts of violence committed against journalists and civil society actors whose professional activity relates to corruption linked with other crimes
- other

10. Has your government adopted or utilized any measures aimed at facilitating **international cooperation** and the rapid exchange of information for cases that have interlinkages between corruption and other forms of crime? **YES/NO**.

a. If **YES**, please elaborate. *Measures may include:*

- the implementation of mutual legal assistance through digital means
- measures aimed at enhancing the efficiency of extradition mechanisms
- ✓ the use of electronic communication channels or networks
- ✓ the use of joint or parallel investigations or the bilateral sharing of capacity and expertise on investigating and prosecuting corruption offences linked with other forms of crime
- ✓ cooperation with other countries or multilateral, international or regional bodies to address corruption linked with other forms of crime
- ✓ accession to bilateral, regional or multilateral treaties and agreements.
- other