

Questionnaire



Contact Information

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

Country: Lithuania

Government Agency: Special Investigation Service

Department: International cooperation

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Please describe (cite and summarize) good practices your country has taken (or is planning to take, together with the related appropriate time frame) concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery.

States parties are invited to provide information on experiences, good practices and challenges concerning the following:

I. Understanding corruption risks and typologies during times of emergencies and crisis response and recovery, including transnational elements

1. Has your government assessed corruption risks during emergencies or crisis response and recovery, either through formal risk assessments or other informal means? Please provide details, such as key findings and mitigation plans. Please describe whether any other (existing) risk assessment has been carried out that is relevant to the emergency response (such as sectoral risk assessments in procurement, healthcare, infrastructure, etc) and provide details.

Yes, during the COVID-19 period the STT continued assessing corruption risks as usual, following the same methodology. Considering this period, one of the assessment areas was related to healthcare and COVID-19 situation management (there were 9 anti-corruption assessments of legal acts and their drafts and 1 corruption risk analysis related to this area).

For example, after carrying out an assessment of the legal acts regulating the procedure for vaccination against COVID-19, it was found that the legal acts approved by the Ministry of Health did not comprehensively regulate the procedures for calculating the required amount of vaccine and distributing the vaccine among healthcare institutions, the procedures for creating and changing lists of persons to be vaccinated in order of priority and reserve lists, the procedure for informing persons about vaccination, the actions of healthcare institutions if there are no opportunities to vaccinate the intended persons due to their refusal, infection with COVID-19, death or other reasons. Due to these insufficiently clear provisions, opportunities that may lead to corruption have been created to vaccinate with the limited amount of vaccine that existed at the beginning of 2021 not the persons with the highest risk of getting COVID-19, but other persons. The absence of a centralized vaccination control system at the beginning of 2021, with a

limited number of vaccines, increased the risk of corruption. The Ministry of Health, taking into account all the recommendations, amended the legislation in question and thus eliminated possible risks of corruption.

Another example related to COVID-19 situation management was related to economy stimulation package. In December 2021, the STT assessed financial support measures designed to preserve business and stimulate the economy, and carried out a more detailed assessment of those measures, for which the largest amount of funds was allocated from European Union (EU) and national budgets or these funds were allocated in a particularly hurried manner. Following analysis, it was determined that companies that did not comply the objectives of the measures were also eligible for financial support, and part of the funds could have been used without seeking to save the activities of those companies. According to this, the STT provided recommendations how to reduce the potential risks of corruption.

2. Please list the main typologies of corruption (corruption risks) you have identified in your country's emergency or crisis responses and recovery. You may select from the list below, and add any additional risks not listed:

Public Procurement

- Bribery of procurement officials
- Excessive use of non-competitive bidding procedures, including by single or limited source tendering, with limited safeguards
- Improper application of emergency procurement procedures allowing for expedited delivery of goods and services
- Bid-rigging (e.g. use of inflated prices)

Misappropriation of Emergency Relief Funds

- Non-eligible beneficiaries circumventing rules and regulations, including through bribes, to obtain access to relief and support
- Diversion of donations away from intended beneficiaries
- Exploiting international financial assistance related to emergency relief or other types of support (such as donor funding or technical assistance)
- Embezzlement of profit gained from the sale and distribution of emergency supplies
- Manipulation and inflation of claims for economic relief
- Fraudulent billing for the provision of goods and services
- Diversion of donated equipment/supplies to the black market
- Companies hoarding/not discharging support received from the government

Conflicts of Interest

- Conflicts of interest between suppliers and authorities in procurement processes

Political appointees or persons entrusted with prominent public functions involved in, or the beneficial owners of, companies bailed out by the government or companies involved in procurement processes

Support packages distributed according to ethnicity and/or political affiliation

Misuse of Information

Use of social media to spread misinformation, undertake fraudulent activities such as phishing, cyber-criminal fraud

Inadequate Reporting/Protection Mechanisms

Inadequate reporting/protection mechanisms for whistle-blowers and witnesses

Restricted ability to report potential corrupt activities

Other Corruption Risks

Extensive use of government emergency powers and regulations, with insufficient controls, consultations and/or guidance

Provision of counterfeit good and supplies

Fraudulent or illicit production of goods, including research

Impeded anti-corruption enforcement actions during emergency and crisis responses due to corruption

Impeded provision of international cooperation (e.g. mutual legal assistance) due to the emergency or crisis due to corruption

Links between corruption and other forms of crime, in particular organized crime and economic crime, including money-laundering

Please list any other typologies or risks:

*The absence of a centralized vaccination control system;
Unequal state policies in support of business due to Covid-19.*

3. Did any of the corruption risks (typologies) identified in question 2 entail an international element? For example, fraudulent or collusive procurement practices involving foreign or international bidders or suppliers, donors or international financial institutions; aspects of transnational bribery; diversion of resources, assets or persons across borders)? Please be as specific as possible and provide details and examples. If the information is sensitive, please describe the typology or give anonymized examples.

*Medical equipment suppliers provided equipment manufactured by foreign companies. Currently, there is no data that foreign companies are involved in criminal acts of a corrupt nature.
Risk of corruption in the purchase of reagents, other medical equipment.
As it was mentioned, the STT assessed financial support measures designed to preserve business and stimulate the economy during the COVID-19 period, and carried out a*

more detailed assessment of those measures for which the largest amount of funds was allocated as well from European Union (EU). Following analysis, it was determined that companies that did not comply the objectives of the measures were also eligible for financial support, and part of the funds could have been used without seeking to save the activities of those companies

4. Please describe whether the corruption risks identified in question 2 appear to be longer-term trends. Have they required new or strengthened anti-corruption actions as a result? If so, please elaborate.

The recommendations of the STT were taken into account and thus particular corruption risks that appeared during the COVID-19 period were eliminated in short-term.

5. Please describe any measures taken to support the private sector in identifying and mitigating corruption risks. This may include particular risks associated with supply chains and procurement processes.

Following corruption risk analysis on measures to support businesses experiencing difficulties due to COVID-19, the STT proposed to ensure unified state policy in the implementation of COVID-19 support measures between institutions (for example, by identifying non-supportive sectors and activities). It was also proposed to clearly name, which specific activities are intended to be prohibited or restricted, thus eliminate the risk of interpretations at the institutional level in creation of a list of prohibited and/or restricted types of economic activities during the quarantine.

6. Please provide an overview of efforts taken to understand the particular impact corruption in times of emergencies and crisis response and recovery may have on women and marginalized and vulnerable groups. If possible, please include reference to any research, analyses or assessments undertaken in this regard.

No research has been done on this topic

7. Is there a greater need for international cooperation in responding to corruption risks in the context of emergency and crisis responses than in other situations? Why, or why not?

As we can see, emergency situations require fast and reliable solutions, therefore international cooperation would be very valuable (for example, perhaps experience of other countries could help us to avoid possible cases of corruption risks, to choose suitable and proven measures for managing risks).

II. Addressing corruption during times of emergencies and crisis response and recovery at the domestic level

1. Please describe the anti-corruption controls, safeguards and/or measures put in place to address the corruption risks identified above in question 2. Please highlight any special measures that may have been introduced in response to a particular emergency, and whether those measures may be useful for future crises. These may include anti-corruption task forces, the use of real-

time audits, transparency portals and specific reporting channels for reporting corruption in the context of emergencies, including in the areas below.

During the COVID-19 period, the same measures and the same methodology as usual were used to address the corruption risks identified above, for example, corruption risk analysis, anti-corruption assessment of legal acts and drafts thereof, implementation of anti-corruption standards of conduct, etc. However, these measures were directed at the areas that were mostly affected by corruption risks due to emergency situation. After the peak of the COVID-19 pandemic four corruption risk analysis in the largest hospitals performed which was directed to public procurement area and covered the pandemic time.

Public procurement and the management of public finances

2. Please describe measures taken to develop and/or further strengthen accountability and transparency in public procurement during times of emergencies and crisis response and recovery. These may include:
- The development of specific guidelines, circulars or memorandums for procurement in emergency contexts;
 - The development of new codes of conduct or guidelines for procurement personnel during times of emergencies and crisis response and recovery;
 - Requirements to disclose potential and real conflicts of interest;
 - Reforms of legal, regulatory and policy frameworks governing public procurement;
 - Requirements to collect and publish the beneficial ownership information of entities contracting with the government;
 - Requirements to cross-check information available on the ultimate beneficial owners of companies involved in procurement processes;
 - Publication of information on the whole procurement cycle, from tender to delivery (including type and amount of contract, reference information for the awarded company, beneficial ownership information, validation of delivery, etc.);
 - Specific labels or “tags” for procurement contracts to facilitate the monitoring of contracts associated with a particular emergency or crisis;
 - Measures to ensure procurement in emergency contexts have appropriate oversight and sanctions, including the potential disqualification of companies;
 - Measures to help ensure that compliance programmes and safeguards are in place for bidders;
 - The use of online portals that afford opportunities to track procurement contracts through the whole procurement cycle;
 - Feedback mechanisms for monitoring by groups outside the public sector, such as civil society organizations.

As it was mention above, during and after the COVID-19 period, the same methodology for corruption risk analysis and anti-corruption assessment of legal acts and drafts thereof, was used to address the corruption risks related as well to public procurement field.

In 2020, the STT has carried out an analytical study and identified corruption risks in relation to ensuring transparency and accountability in public procurement procedures, especially due to the COVID-19 pandemic imposed risks. In 2021 the following weaknesses were identified:

• *The extent of public procurement by means of open negotiations suggests that this method of organizing procurement was not chosen only in unavoidable and particularly urgent cases.*

• *The lack of transparency in procurement during the emergency situation is reflected in the lack of publicity of procurement contracts.*

• *In times of emergency, a lack of transparency in procurement prevents the efficient use of public funds.*

• *Suppliers who win high-value public procurement contracts, who are first-time tenderers, and have a very small workforce and/or who do not normally engage in activities related to the supply or use of security equipment, or to the transport of persons or goods, are an indication of the risk that public funds may be used irrationally (possibly over-priced, potentially low-quality purchases).*

In order to strengthen standards of transparency and accountability, the STT have made the following proposals to the Committee on National Security and Defense, Anticorruption Commission of the Parliament of the Republic of Lithuania, Office of the Government of the Republic of Lithuania, Office of the President of the Republic of Lithuania and the Office of the Committee on Audit:

• *Opening and regularly updating systematic data on all public procurement contracts and the phases of public procurement.*

• *Speeding up the publication of contracts negotiated by undisclosed negotiation on grounds of urgency.*

• *Supplementing published data on procurement contracts with indicators indicating anti-corruption-sensitive purchases (e.g. type of purchase).*

• *Introduce provisions to prevent abusive suppliers from participating in future public procurement tenders.*

• *Ensuring effective control of conflicts of public and private interests in public procurement.*

• *Enabling the prices at which the contracting authority procures goods, services and works to be compared with their prices on the market, and making the results of this comparison available to the public.*

In 2021 the observations have been taken into account and the Office of the Government of the Republic of Lithuania will aim to facilitate the use of undisclosed negotiations and dynamic procurement systems, introduce more flexibility in the use of simplified open tendering, supplement the conditions for termination of a contract, increase the number of entities that can initiate a transaction review for compliance with national security interests. The Ministry of Economy and Innovation is currently working on amendments to the law on procurement to simplify the conduct of public procurement.

3. Please highlight 2-3 good practices and challenges faced when developing, implementing and/or monitoring the measures you have identified in question 2.

Challenge: prompt and timely provision of information and timely implementation of recommendations due to high workload in targeted institutions.

4. Were internal audit systems, real-time audit mechanisms and/or other mechanisms used to help monitor and oversee the management of public resources during times of emergencies and crisis

response and recovery? If so, please describe. Please provide any information on good practices and/or lessons learned.

5. Please describe what measures or initiatives could be used/have been used to help ensure transparency in the allocation, use, distribution and management of the national budget during times of emergencies and crisis response and recovery. These may include dedicated budget lines, measures to present budget items, public hearings or rendering such information accessible to the public.

Apart from the mentioned corruption risk analyses, STT did not evaluate the allocation, use, distribution and management of the national budget.

In terms of what could be done, we consider that all the measures that are mentioned in the question (dedicated budget lines, measures to present budget items, public hearings, etc.) would be useful. Also, there is a need for greater transparency and disclosure of data related to national budget (it enables real-time control and public accountability).

Inter-institutional coordination at the national level

6. Please outline measures which could be taken or have been taken to enhance coordination among institutions at the national level involved in response and recovery efforts, such as Memorandums of Understanding, data sharing agreements, standard operating procedures or other formal and informal mechanisms that enable institutions to share information and respond in a coordinated manner to corruption risks in the context of emergencies.

As in the case of other situations, to strengthen the coordination at the national level is pursued as well through strategic documents, for example, the new National anti-corruption agenda for the period of 2022-2033 foresees the need to strengthen cooperation among public sector institutions, emphasizes the importance of open data and publication of information as a preventive measure.

Transparency measures, including access to information

7. Does the government have specific measures in place to identify individuals who may be involved in, or who help facilitate, corrupt acts? Such measures may include requirements to disclose beneficial ownership information and requirements to make such information accessible to law enforcement or other authorities. For example, information contained in beneficial ownership registries or information contained in open tender portals may be used by supreme audit institutions and other oversight bodies to audit, and inform, response and recovery measures.

Obtaining information about persons and the right of institutions to obtain this information is provided by law (Article 8 of the STT Law¹, Article 25 of the Law on Prevention of Corruption², Article 6 of the Criminal Intelligence Law³).

8. How does the government ensure that emergency measures are limited in duration and scope? Please describe any measures taken to mitigate the use of broad emergency executive authority, such as legislative oversight, regular reports to committees, and review and monitoring mechanisms.

9. Have your authorities applied or strengthened whistle-blower protection or reporting systems, including those that afford opportunities for confidential and/or anonymous reports, and how to address such reports?

A comprehensive whistleblowers protection system was established recently in Lithuania with adoption of Law on Whistleblowers Protection that entered into force on 1 January 2019. In 2021, the law was partially amended to comply fully with the EU Directive 2019/1937 on the protection of persons who report breaches of Union law. When dealing with complaints or reports of corruption, we strive to ensure confidentiality and protection of every person.

Each institution and person receiving or examining information about a violation must ensure the confidentiality of the person who provided the information about the violation.

The identity of the whistleblower may only be disclosed to the person or authority examining the information on the violation.

The requirement of confidentiality shall not apply where:

- 1. it is requested in writing by the person who submits or has submitted information regarding the violation.*
- 2. the person provides knowingly false information.*

The confidentiality of persons who have provided information on violations must be ensured in public administration, official (disciplinary) misconduct proceedings or administrative or criminal proceedings, as far as it is objectively possible in the light of the data provided and their relationship with the whistleblower.

Use of information and communication technology tools

10. Has the government used information and communication technology tools to build, implement and/or maintain resilient emergency response systems? If yes, please explain what types of tools have been used and include relevant links, if possible.

¹ Law of Special Investigation Service of the Republic of Lithuania No. VIII-1649. Last amendment 24th of March 2022. <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.100816/asr>

² Law on Prevention of Corruption of the Republic of Lithuania No. IX-904. Last amendment from 1st of January 2022. <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.100816/asr>

³ Criminal Intelligence Law of the Republic of Lithuania No. XI-2234. Last amendment from 31st of December 2022. <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.434526/asr>

11. If possible, please describe the benefits and challenges of using the tools identified in 10?

12. Has the government used information and communication technology to help manage and oversee public procurement during times of emergencies? If yes, please explain the particular tool, its benefits and challenges and include relevant links, if possible.

13. Has the government used information and communication technology to promote transparency in the management of public finances during times of emergencies and crisis response and recovery? If yes, please explain the particular tool, its benefits and challenges and include relevant links, if possible.

Engagement of actors outside the public sector

14. If possible, please provide an overview of how the government has partnered with, or encouraged the participation of, actors outside the public sector to help monitor and support oversight of government actions during times of emergencies and crisis response and recovery. Please also include any future initiatives planned.

15. Are there any policies or initiatives that particularly facilitated the engagement of actors outside the public sector in these contexts? If yes, please describe.

III. Responding to corruption during times of emergencies and crisis response and recovery, including through international cooperation

1. If possible, please provide examples of detected or suspected instances of domestic or transnational corruption and how these were identified in your country. If the information is sensitive, please describe the typology or give anonymized examples.

Research on the purchase of reagents from a foreign company. The foreign company has paid a higher price, including the fee to the intermediary. The company transferred the payment to the intermediary's account. The European Investigation Order was issued, company representatives were interviewed. The intermediary has been accused of fraud and abuse of office.

2. How did the government respond? Has your country taken any steps to identify, investigate or prosecute corruption in emergency and crisis responses and recovery? Examples may include an interagency cooperation taskforce among anti-corruption authorities, analysis of suspicious transaction or financial disclosure reports, greater cooperation across international borders, strengthening investigation and prosecution capacity, etc.

3. In its response, did your authorities find it necessary to seek or request international cooperation (e.g. mutual legal assistance or direct law enforcement cooperation)? Please provide details and examples. How effective do you believe the cooperation was, and what were the main challenges? Was the assistance provided, were there any obstacles?

The European Investigation Order had been issued, based on it, all the necessary information was obtained. No obstacles encountered.

4. Has your government received any requests for international cooperation from other countries seeking to identify, investigate or prosecute corruption during times of emergencies and crisis response and recovery? Please provide details and examples. How effective do you believe your authorities cooperated, and what were the main challenges? Was the assistance provided, were there any obstacles?

Recently, requests have been received from Ukraine, as far as possible, STT provides the necessary information immediately. However, it is not always possible to provide sensitive personal information, such as transactions carried out by individuals - to obtain such information, it is necessary to start an investigation and obtain court sanctions.

In addition, inquiries are received from authorities of other countries related to international sanctions. STT, as far as possible and in accordance with law, provides the gathered information immediately.

IV. Mechanisms to respond to corruption during times of emergencies and crisis response and recovery through international cooperation

1. Have your authorities had any practical experience in sharing information, including spontaneously, with authorities in other countries concerning suspected corruption in the context of emergency or crisis responses?

Information is constantly exchanged with the authorities of other countries.

2. Has your government used electronic communication channels or networks, including those of INTERPOL or the GlobE Network, that enable the prompt exchange of information for the investigation and prosecution of corruption offences in the context of emergency and crisis responses?

SIENA is used for information exchange between EU law enforcement agencies.

3. Are you aware of any examples of joint or parallel investigations or the bilateral sharing of capacity and expertise on investigating and prosecuting corruption in this context?

4. Have you taken additional measures to analyse asset declarations, financial disclosures and/or suspicious transaction reports during times of emergencies or crisis response and recovery?

5. Have you experienced challenges in accessing adequate, accurate and up-to-date information on the beneficial ownership and control of legal persons in other jurisdictions? In your view, what may be improved to enable effective, timely access to such information?

6. Have you experienced challenges in verifying assets beneficially owned by public officials abroad? In your view, what may be improved to enable effective, timely access to such information?

7. Have there been any efforts to support anti-corruption practitioners and law enforcement authorities in your country, including human resources management and opportunities for capacity-building and peer-learning on methods, tools and technologies for countering corruption in the context of emergency and crisis responses?

A new interactive anti-corruption education tool was developed and introduced, namely STT anti-corruption e-learning platform. The platform is devoted to both public and private sector representatives and the society. Platform users are able to participate in a self-paced courses divided into several subtopics and final tests at each course. After finishing all the courses, participants are be able to get a certificate attesting the completion of each course.

The focus is not only on the basic knowledge of civil servants about the risks of corruption and corruption related crimes, but also on the officials or civil servants responsible for corruption prevention, public procurement or whistleblowers' protection in their workplaces and their responsibilities. This platform will allow us to reduce and finally renounce theoretical lectures and meetings we have had so far and focus on to more active and proactive workshops where our colleagues can work with the most motivated individuals who are able to successfully lead by example in creating an anti-corruption environment.

During the one year period of September 2021-September 2022, nearly 17 000 users have registered to the platform and more than 24 000 unique e-certificates were issued. The platform is available at: <https://emokymai.stt.lt/>.

8. In your view, are there any unique aspects of requesting or providing international cooperation in emergency and crises responses as opposed to regular cases?

Operative cooperation is required in order to reveal criminal acts of a corrupt nature as soon as possible and in the most complete way.

9. Does your government have any experience in receiving or providing international financial assistance (such as donor funding or technical assistance) to address emergency situations? In your view, what are effective mechanisms to strengthen integrity and prevent corruption in the provision of emergency relief funds? What should be improved?

V. Effectiveness of international frameworks to respond to corruption during times of emergencies and crisis response and recovery, including through international cooperation

1. Are there any longer-term trends related to addressing corruption in emergency and crisis responses that require a new or improved anti-corruption approach in the future? Or that require greater international cooperation or new ways of working together? Please explain.

2. Are there any measures or processes that you would consider good practices to facilitate international cooperation and rapid exchange of information in emergency and crisis situations? Examples could include measures to accept electronic copies of mutual legal assistance requests and prioritize requests concerning corruption during times of emergencies and crisis response and recovery. Has your country had any experience in this regard?

Close cooperation, prompt exchange of information (using communication channels or networks, maintaining direct contact) in order to investigate criminal acts as successfully as possible.

3. How should countries strengthen collaboration to address corruption risks arising in emergency and crisis situations, with respect to international cooperation? Please list up to three measures countries could apply that would strengthen international cooperation in this regard.

Exchange of information in the early stage of the investigation; use communication channels or networks; maintain direct contact.

4. Have there been any efforts by your government to enhance cooperation with multilateral, international or regional bodies to address corruption and other forms of crime during times of emergencies and crisis response and recovery?

VI. Data collection

1. Have your authorities collected data or statistics to track and analyse trends concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery. Are these publicly available?

The STT constantly collects and compiles statistical data related to criminal acts of a corrupt nature. Some data is publicly available.

2. Have your authorities collected data or statistics to track and analyse trends and links between corruption and other forms of crime? Are these publicly available?

STT, as the main anti-corruption institution in Lithuania, which main goal is fight against corruption, constantly collects and accumulates statistical data related to criminal acts of a corrupt nature. The service does not collect or accumulate statistical data on other types of criminal acts, as such investigations are not within the competence of STT. Some statistical data is publicly available.

Please outline actions required to ensure or improve the implementation of the commitments contained in paragraph 23 of resolution 9/1, as well as any challenges faced or technical assistance required.

Please describe (cite and summarize) measures/steps your country has taken, if any (or is planning to take, together with the related appropriate time frame) to explore and enhance

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.

States parties are invited to respond to the following questions:

I. Analyses and assessments to explore and enhance knowledge of the links between corruption and other forms of crime

1. Has your government undertaken any analyses or assessments to better understand the links between corruption and other forms of crime, including typologies of crime and how corruption may be used to facilitate and enable organized crime?

2. Has your government taken any measures to strengthen legal, regulatory and policy frameworks that recognize how corruption and other forms of crime may be linked and that call for coordinated anti-corruption action?

In order to improve and better coordinate the anti-corruption actions in the country, the Government of the Republic of Lithuania has established the Governmental Commission for the Coordination of the Fight against Corruption. The Commission consists of ministers and is headed by Prime Minister. One of the deputy chairs is the Director of the STT. The Commission's tasks are:

- 1. to coordinate the activities of state institutions in the field of the fight against corruption and submit proposals to the Government for the improvement of legal regulation and other actions in order to ensure effective prevention of corruption and the detection of corruption violations;*
- 2. to consider anti-corruption issues and to submit proposals to the Government, state and municipal institutions and bodies regarding priority directions of anti-corruption activities and improvement of legal regulation;*
- 3. to evaluate and analyse the results of the activities of state and municipal institutions and bodies in the field of corruption prevention and detection of corruption offences, to submit proposals for improvement of activities;*
- 4. to monitor the implementation of National Agenda for the Prevention of Corruption 2022-2033 and four –year Plans of the National Agenda for the Prevention of Corruption.*

Also, the parliamentary Anti-Corruption Commission, established in the Seimas, scrutinizes corruption and related cases (parliamentary inquiry), takes decisions on the issues under consideration and monitors the implementation of them by the institutions; analyses the decisions of state and municipal institutions, bodies and enterprises, which enable corruption, other forms of crime and violations of law, and seeks the annulment of such decisions. It also submit proposals to the Seimas, the Government and other institutions regarding the adoption and improvement of legislation, the prevention and prevention of corruption, economic and financial crimes and other violations of law.

The Commission may set up temporary study groups from among its members to examine specific issues. The Commission does not interfere with the activities of law enforcement authorities and courts in relation to their direct functions.

3. Does your country's national risk assessment or other policy framework to prevent and combat money-laundering recognize and address the risk of laundering of proceeds of corruption and other economic crime?

II. Specific mitigation measures to address corruption and other forms of crime during times of emergencies and crisis response and recovery

1. Have your country's authorities undertaken any investigations into unfair commercial practices, such as price-gouging and the manipulation of prices of essential goods and services, or bids, or abuse in the allocation, distribution, use and management of relief and recovery funds? Have your country's authorities undertaken any investigations into corruption during times of emergencies and crisis response and recovery, such as bribery of procurement or other public officials, embezzlement of profits, diversion of resources and conflicts of interest? Have any measures been applied to freeze and seize related proceeds of crime?

In order to prevent unfair and misleading business practices during the COVID -19 pandemic, the State Consumer Rights Protection Authority of Republic of Lithuania monitors the market goods and services on its own initiative and reacts actively to incoming requests. The Authority has started 53 preliminary investigations and carried out 64 inspections on the market (sanction fluid and protective masks for sale) since the beginning of March 2020. As many as 40 % of investigations were opened for misleading advertising, a third of investigations were initiated on possible unjustified price increases, price-gouging and signs of aggressive behaviour were identified.

In cases of misleading advertising, consumers were offered to buy protective masks, food supplements and water filters online, indicating that they have antibacterial properties or even protect against the COVID-19 virus. Detergents or cosmetic products were advertised as disinfectants. There have also been reports of medicines (drugs) supposedly treating coronavirus.

In the area of price-gouging and the manipulation of prices, most requests were submitted for possible unjustified price increases to protective masks and respirators, disinfectant fluid. There have also been notifications from consumers about increased food prices, especially meat prices.

For infringements of consumer rights in the field of consumer protection, the Authority may impose sanctions as provided for in the laws.

STT have not undertaken any investigations into corruption in this area.

However, an investigation by the STT was carried out in 2020, bringing allegations against the head of a non-governmental organisation who, as a civil servant and independent expert, allegedly abused his office, committed fraud and illegally acquired assets of considerable value for his own benefit. The case is currently in court. Proceedings are pending at the court of first instance.

The alleged abuse of office took the form of taking advantage of the situation of the spread of Covid-19, where he, acting as a representative of the Government of the Republic of Lithuania and as an impartial expert, coordinated the actions of State institutions and bodies in organising the purchase and delivery of Covid reagents, negotiated with the supplier on the prices and agreed with the suppliers that part of the funds would be transferred to him without being disclosed. More than €300,000 was frozen until the court's decision.

Please outline actions required to ensure or improve the implementation of the commitments contained in paragraph 22 of resolution 9/1, as well as any challenges faced or technical assistance required.