

Annex

To facilitate the provision of information on good practices and challenges with respect to the establishment of effective financial disclosure systems for appropriate public officials (inter alia information on legislation, policies, practices and institutions on establishing and maintaining effective financial disclosure systems for appropriate public officials, including measures as may be necessary to permit their competent authorities to share that information with the competent authorities in other States parties) the Secretariat has prepared the following questionnaire as a guide that States parties may wish to use.

The Secretariat also wishes to draw the attention of the Government to the note entitled “Asset and interest disclosure systems (article 8, paragraph 5, of the United Nations Convention against Corruption)” contained in document [CAC/COSP/WG.4/2018/3](#) that could be used as background material for the completion of the questionnaire.

Contact information

1. Basic information

1.1. Does your country have a financial disclosure system(s) for appropriate public officials in line with articles 8, paragraph 5 and 52, paragraphs 5 and 6 of the Convention?

YES

If YES,

- a. Please provide a broad overview of your country’s financial disclosure system(s) for public officials and list the relevant national legislation.

Certain official persons as listed in the Integrity and Corruption Prevention Act (hereinafter: IPCA) (see next paragraph) have an obligation to report their assets to the Commission for the Prevention of Corruption (hereinafter: Commission) in accordance with the IPCA. A system of asset declarations is centralized and is managed by the Commission. It allows online submission of declarations. Currently, approx. 20.000 official persons are required to submit their asset declarations.

Official persons are: professional officials, members of the State Council, non-professional mayors and vice-mayors, officials in office, managers and members of supervisory bodies of public enterprises and companies in which the State or the local community has a majority stake or a dominant influence, persons responsible for public procurement, officials of the State Audit Commission for the Audit of Public Procurement Procedures (hereinafter referred to as: State Audit Commission) and citizens of the Republic of Slovenia who hold an office in the EU institutions and other bodies and other international institutions to which they have been appointed or elected on the basis of a posting or a proposal of the Government or the National Assembly, and whose obligation to declare their assets is not otherwise regulated by the acts of the institution and other bodies of the EU or other international institutions for which they hold an office.

All official persons listed in the previous paragraph, apart from the persons responsible for public procurement are included in the list due to their rank whole persons responsible for public procurement have been included in the list due to the area of sensitivity (public procurement) in which they are involved.

Official persons must file an asset declaration no later than one month after taking or ceasing to hold office or post as well as one year after ceasing to hold office or post. Furthermore, any change in assets, if exceeding 10.000 EUR, must be reported by 31st January for the previous calendar year. These reporting obligations are a bit different for persons responsible for public procurement who should provide the Commission with data on their assets as at 31st December by 31 January for the previous year, if in the previous calendar year they participated in a public procurement procedure as defined in the IPCA.

Official persons are obliged to declare the following:

- personal information, such as name, address, tax ID number;
- information on current work and work performed immediately before taking office, as well as information on any other office held or activities performed;
- data on immovable property: type, size, year of construction, cadastral municipality, ownership share, plot number, building number and the number of the part of the building,
- data on rights on immovable property and other property rights,
- data on movable property the value of which exceeds EUR 10,000,
- data on monetary assets deposited in banks, savings banks, and savings and loan undertakings if the total account balance exceeds EUR 10,000;
- data on the total value of cash held if this exceeds EUR 10,000 in value;
- data on ownership or stakes and shares, if their total value exceeds EUR 10,000, and management rights in a company or other private-law entity, with the designation of the registered name of the legal person or the name of the entity and data on the types and values of securities if their total value exceeds EUR 10,000,
- data on debts, obligations, or assumed guarantees and granted loans if their value exceeds EUR 10,000, and
- any other data in relation to assets that the person with obligations wishes to provide or that is prescribed by this Act.

The person with obligations shall communicate the data on assets if they are the legal owner of the individual assets declared. Actual ownership and shares in the total ownership of a particular asset declared shall be provided under the last indent.

- a. If your country has, in addition, ad hoc financial disclosure requirements, please provide a broad overview, including applicable categories of officials, sectors/activities, etc.

According to the IPCA, the Commission may, if an official person fails to submit his/her asset declaration, provide him/her with a deadline for submission (15-30 days). If the deadline expires and the official person concerned has not submitted the form, his/her salary compensation will be reduced by 10% of his/her basic salary each month after the expiry of the deadline, but to no less than the minimum salary level.

If there is a disproportionate increase in the assets of an official person, the Commission may start an investigation into the reasons for such an increase. If there is a reasonable risk that the assets may dissipate, the Commission may contact the State Prosecutor's Office or the competent authority in the field of money laundering and tax evasion, so that temporary measures are taken to secure the money and assets. The Commission must be kept informed on the action taken thereafter by the relevant law enforcement authorities.

Family members are not required to file an asset declaration, except if required to do so by the Commission, if there are reasonable grounds to believe that the official person may have transferred his/her assets or income to family members in order to avoid control. Family members include spouses, children, adopted children, parents, adoptive parents, brothers, sisters, or any other persons living with an individual in a joint household or in a consensual union.

- b. What is the objective(s) of your country's financial disclosure system(s) (please select all that apply)?

- Detection of illicit enrichment**
 Prevention of conflicts of interest
 All of the above (combined system)
 Other, please describe: _____

If NO,

- a. Please describe (cite and summarize) the alternative measures put in place to ensure full compliance with article 8, paragraph 5 and article 52, paragraphs 5 and 6 of the Convention or is planning to take, together with the envisaged time frame, if any.

- 1.2. Has your country criminalized "illicit enrichment" as foreseen under article 20 of the Convention? **YES**

If **YES**, please explain.

Slovenia has not criminalized illicit enrichment. Slovenia has an asset declaration system and has established the legal consequences of the violation of financial disclosure obligations.

2. Targeted officials

- 2.1. Please list the categories of officials required to file a financial disclosure. Please select all that apply and provide the range of targeted officials in each relevant category.¹

Public officials, including representatives from all branches and agencies of government

Members of the legislative branch, please list: deputies of the National Assembly, members of the National Council, the Secretary-General of the National Assembly, the Secretary of the national Council

Members of the judiciary and prosecution, please list: Constitutional Court judges, other judges, state attorneys

Members of the executive branch, including armed forces and agencies subordinate to a minister, please list: the President of the Republic, the Prime Minister, ministers, state secretaries, the Secretary-General of the Government, the Secretary-General of the President of the Republic, the adviser to the President of the Republic, the Head of the

¹ Professional officials, members of the State Council, non-professional mayors and deputy mayors, officials in positions, managers and members of supervisory bodies in public companies and companies in which the state or local community has a majority share or a dominant influence are liable for the declaration of assets. , persons responsible for public procurement, officials of the National Audit Commission for the Audit of Public Procurement Procedures (hereinafter referred to as: the National Audit Commission) and citizens of the Republic of Slovenia who perform functions in the institutions and other bodies of the EU and other international institutions to which they have been appointed appointed or elected on the basis of referral or proposal of the government or the National Assembly, and their obligation to declare their assets is not otherwise regulated by the acts of the institution and other EU bodies or other international institutions for which they perform their functions

Office of the President of the Republic, the Deputy Secretary-General of the President of the Republic

X Officials of independent government bodies (e.g., standalone boards, commissions and agencies that fall outside the executive, legislative and judicial branches of government), please list: **officials of the National Review Commission for Reviewing Public Procurement Procedures, members of the Governing Board of the Bank of Slovenia, unless their rights and obligations are stipulated otherwise by the act governing the Bank of Slovenia and other regulations binding on the Bank of Slovenia**

X Officials at the supranational (high-level) bodies (e.g., representatives of the country in regional and global organizations/bodies), please list: **citizens of the Republic of Slovenia who hold office in EU institutions and other EU bodies and other international institutions to which they have been appointed or elected on the basis of secondment or a proposal from the Government or the National Assembly and whose obligation to declare assets is not otherwise regulated by the documents of EU institutions or other EU bodies or other international institutions for which they perform duties**

X Officials at subnational levels of government (e.g., officials at the level of local government, provinces and municipalities), please list: **professional holders of public office at subnational level (mayors and deputy mayors), non-professional mayors and deputy mayors**

- Political party officials, please list:

X Representatives of publicly owned (fully and partially) enterprises, please list: **managers and members of supervisory bodies in state-owned enterprises and corporations in which a controlling interest or a dominant influence is held either by the state or by a local community**

- Representatives of private entities, professional associations, foundations and similar bodies performing public functions and services of public interest, please list:

X Other, please list: **persons responsible for public procurement**

2.2. What factor(s) shaped the decision on the targeted categories of officials? Please select all that apply.

X Objective of the system

X Hierarchical level and position of officials

X Corruption risk level of sectors and functions

- Resources and capacity to manage and verify disclosure
- Other.

2.2.1. Please elaborate on your response above.

The decision to include targeted categories of officials is based on the premise that supervision should be carried out with regard to top officials as this guarantees transparency and trust in public functions and is therefore an integral part of public sector integrity. To this objective another group has been added, namely persons involved in public procurement procedures, due to area of sensitivity in which they perform their activities.

2.3. Does any authority have the power to request any official who would usually fall outside the disclosure system to file financial disclosure (e.g., designate those in high-risk categories, those under investigation for corruption offences, etc.)? **YES**

- Financial administration

If YES, please list the authority(ies), and explain the applicable criteria and procedures.

The Tax Administration has its own legislation and powers to require persons to explain their allegedly ill-gotten wealth.

2.4. How does your country create and update the list of filers?

The public sector bodies or organisations with which the persons obliged to declare assets are employed shall provide the Commission with a list of such persons within 30 days of any change.

2.5. Please provide the approximate number of filers.

Approx. 22,000 filers.

3. Frequency of disclosure

3.1. When and how often are targeted officials required to file/submit financial disclosures? Please select all that apply.

Upon entering office

Upon leaving office

Annually

Biennially (once every two years)

Once every three years

Some categories of officials are more frequently required to declare than the others – persons involved in public procurement procedures are required to report by 31st January in case they have been involved in public procurement procedure in the previous calendar year

Other, please describe. __ in the event of change in assets if exceeding 10.000 EUR – by 31st January for the previous year in which the change occurred.

3.2. Does the competent authority have the power to request targeted officials (filers) to submit ad hoc financial disclosures between the official submission periods? **YES**

If YES, please explain.

If the Commission finds that the official person obliged to declare assets has not provided it with information on his/her functions, activities, assets and income in accordance with IPCA, it shall ask him/her to provide the required data within a period of no less than 15 and no longer than 30 days.

The Commission controls the correctness, timeliness and completeness of the reporting of information on the financial situation and changes to this situation. In the case of suspected violations of the obligation to declare assets and suspicion of a disproportionate increase in assets, the Commission compares the declared data of the official person on their assets with the data it obtained on the basis of the request under Article 16 of IPCA. If, on the basis of the comparison of the data from the previous paragraph, the Commission finds a discrepancy, it requests the official person to explain the discrepancy in writing within 15 days and to attach relevant supporting documents, but it may conduct an interview with the official person to clarify the actual situation.

3.3. Are the targeted officials required to update/amend their financial disclosures between submission periods? **YES**

If YES, please provide the ground for updating/amending submitted disclosures and the relevant time frame.

Official person must notify the Commission of any change in personal information within 30 days of the change, and of any change in assets no later than 31 January of the year following the change.

The form for the notification of changes in assets shall also include the possibility to indicate the reason for the increase or decrease in assets.

The Commission may at any time request the official person to provide it with complete information on assets. The official person must submit this information to the Commission within 15 days of the receipt of the request

4. Competent authority and disclosure process

4.1. Which authority/entity is responsible for collecting and maintaining financial disclosures? Please select all that apply.

Central competent authority

- Entities employing the targeted officials
- Other authorities depending on the categories/levels of officials (election Commissions, supreme courts, parliamentary committees, etc.). Please list: _____

4.2. How are the financial disclosures submitted?

Centralized submission directly to the central competent authority via:

Electronic (online) submission system

- Submission using the paper submission
- Delegated submission using paper submission (e.g., to individual bodies, which store them and transmit them to the competent authority)
- Delegated submission using both paper and electronic (online) submission (*paper declarations are submitted to individual bodies while the electronic copies are submitted to a centralized online system of the competent authority*)
- Other.

4.2.1. Please elaborate on your response above and describe the processes and methods of submitting the disclosures.

The official person fills out the declaration form via the eAdministration portal, for this action s/he needs a digital certificate and an electronic signature.

4.3. If electronic submission is possible, please describe the online tools and platforms available for submitting financial disclosures.

The eAdministration portal is located on: <https://e-uprava.gov.si/en>

- 4.4. Please describe the measures implemented to ensure compliance and appropriate quality of information when completing and submitting the financial disclosure (e.g., disseminating information materials, training, awareness raising, etc.).

Official persons are informed of their obligations through various means: trainings, KPK Vestnik (monthly newsletter of the Commission), notices on the CPC's website, Info package (disseminated to every office holders in the legislative and executive branch).

Electronic forms can be accessed via the CPCs website or via eAdministration portal. Electronic forms are designed in a way as to guide the person obliged to fill in the necessary data as to prevent mistakes (i.e. predetermined selection of possible options to choose from, only possible to select a date in the past on which assets were obtained etc.).

Certain personal data of the official person has been automatically changed in the online form (i.e. in case a personal name, address has been changed).

Verification is carried out by means of regular and extraordinary controls. Verifications are carried out manually as there is no electronic data exchange system in place.

5. Scope of disclosures

- 5.1. Please list the assets and interests included in the financial disclosure forms, including categories of assets and other financial interests. Please also refer to the list below.

X Immovable and movable assets

- their value and source
- those (assets) held in the name of others
- Income
 - their source

X Securities

X Investments

X Savings

X Bank accounts

X Any other business relationships with financial institutions

X Liabilities / loans / mortgage

X Cash

- Gifts

X Livestock up to 10.000 eur

X Ownership interests (*shareholdings*) in companies and other legal entities and arrangements

X Business / outside activities (*business interests and financial connections*)

X License(s) (*to carry out commercial activities*)

X Usufruct rights (*to use and benefit from an asset owned by others*)

X Information on all legal persons linked to the official in any way, individual economic activity, membership and position in undertakings, establishments, associations or foundations

- 5.2. Is the requirement to disclose an asset dependent on its value (e.g., assets below a certain threshold do not need to be declared)? Please explain. **YES.**

Official persons are obliged to disclose data on assets if a value of an asset is above 10,000 EUR (except in case of immovable property).

- 5.3. Does the information mentioned in question 5.1 include assets and relevant financial interests located both in and outside the country? **YES**

The official person must report all assets held at home or abroad.

- 5.3.1. **If YES**, does it require the disclosure of an interest in or a signature or other authority over a financial account in a foreign country (please see article 52, paragraph 6, of the Convention)?

Disclosures of offshore accounts are also required.

- 5.4. Does your country's financial disclosure system include a declaration of beneficial ownership (of legal entities and arrangements, including nominee arrangements and trusts)?² **NO**

Please explain.

- 5.4.1. Are the targeted officials required to declare assets and interests held, managed or controlled through such legal entities and arrangements? **NO**

If YES, please explain.

- 5.5. Are targeted officials also required to submit information for their family members? **NO, unless if required to do so by the Commission, if there are reasonable grounds to believe that the official person may have transferred his/her assets or income to family members in order to avoid control. Family members include spouses, children, adopted children, parents, adoptive parents, brothers, sisters, or any other persons living with an individual in the same household or in a common-law partnership.**

If YES,

- a. Please describe the scope of the family members (spouse(s), registered/non-registered partner(s), children (minor, financially dependent, within the same household, age limits, etc.)).
- b. Please describe the type of information that must be submitted for family members. Is it the same as of the public official?

- 5.6. Does the financial disclosure system cover individuals other than the family members of the filers? **NO**

If **YES**, please list the applicable individuals and the type of information that needs to be submitted.

- 5.7. For subsequent regular financial disclosures, what is the extent of information included in such financial disclosures?

² On beneficial ownership, please refer to the conference room paper prepared by the secretariat entitled "Good practices and challenges with respect to beneficial ownership and how it can foster and enhance the effective recovery and return of proceeds of crime" ([CAC/COSP/WG.2/2022/CRP.1](#)).

X Information required in the disclosure includes only changes in the equity of the filer since the last disclosure

X A complete new disclosure (i.e., a net worth statement)

Other, please describe: _____

5.8. Does your country's financial disclosure regime require declaring expenditures? **NO**

If YES, please provide an overview of the relevant features.

6. Access to disclosed information

6.1. Is the information on financial disclosure publicly available? **YES, in part and with regard to only certain groups of public officials as listed by the IPCA**

If YES OR YES IN PART

a. Please describe the measures in place to ensure public access to financial disclosure information (*e.g., proactive publication on a central online platform and/or on relevant authorities' websites, ad hoc disclosure in a paper form upon request, etc.*)

Public availability of data is prescribed in article 46 of IPCA.

The data on asset changes of National Assembly deputies, the President of the National Council, the President of the Republic, the Prime Minister, ministries, state secretaries, professional and non-professional mayors and deputy mayors, members of the Governing Board of the Bank of Slovenia, holders of public office in independent and autonomous state bodies performing the duties of supervisors or their deputies and Constitutional Court judges shall be publicly available on the Commission's website for the entire duration of their term and another year after the termination of office.

The publication shall encompass the data submitted by the person with obligations via the electronic form by which they are reporting any changes in assets. In addition to the form, the Commission may also publish its findings on the accuracy, completeness and timeliness of the declaration.

The Commission shall publish the data within no later than 30 days after receiving the asset declaration changes.

The data on assets and changes thereto of other persons with obligations shall not be considered information of a public nature.

b. If not all disclosures are publicly available, please list the categories of targeted officials whose disclosures are accessible and/or remain confidential.

See above.

c. If only part of the financial disclosure information is available, please list the type of information that is publicly available.

Only changes in assets that are declared may become publicly available.

d. Does accessing financial disclosure information entail any costs? **NO**

- e. Does the publication of financial disclosure provide features to search information by different types of information, e.g., legally and beneficially held entities' names and business addresses, types of assets and interests? Please explain. **NO**
- f. Do the means of enabling public access allow for a comparison of the targeted officials' assets and interests over a specific period? **NO**
- g. Are any measures in place to protect the personal information of the targeted officials and their family members, when applicable? Please explain. **YES**
 - Personal Data Protection Act
 - Access to Public Information Act
- h. Please provide the link(s) to the online platform/resource where financial disclosure information is available to the public, if applicable.

<https://www.kpk-rs.si/delo-komisije/instituti/premozenjsko-stanje/javna-objava-sprememb-premozenjskega-stanja/>

6.2. Do the relevant competent national authorities (law enforcement, FIU, tax and customs authorities, etc.) have access to the financial disclosures? **YES**

If YES or YES IN PART, please explain how such access is granted, including the list of competent national authorities that can access or request access.

The relevant competent national authorities do not have direct access to the Commission's databases but may request for information from the Commission. Such data may be provided bearing in mind existence of legal provisions of respective procedural laws providing for such access.

7. Verification of financial disclosure information

7.1. Is the information disclosed verified? **YES**

If YES, please describe the procedures and practices in place to verify the content of financial disclosures, including:

- a. Competent authority that conducts the verification (centralized and/or delegated)
- b. Frequency (regularity) of verifications (ad hoc and/or systematic and routine)
- c. Extent of verification (verification of completeness, compliance with disclosure requirements and/or the analysis of the content of the disclosures)
- d. Verification processes and methodologies (e.g., manual examination, electronic checks undertaken against other databases or relevant information, etc.)

Verification is conducted by the Commission. Verification is done in respect of pre-selected groups of official persons – these are selected on the basis of determining priority issues by the Commission for each year. Furthermore, verification is done ad hoc, on the basis of reported breaches or other reports (ie media reports) received by the Commission. Timeliness is always verified. Then information provided in the report received by the Commission is checked to establish whether any

reported breaches of reporting obligations or significant increase of assets can be identified. For this purpose, other institutions (banks, tax authorities, stock exchange institutions) are requested to provide the Commission with the data. The Commission also has established direct access to certain databases (cars, cadastre, etc.) which are checked. In case certain data cannot be obtained from institutions, the person obliged to declare assets may be requested to provide explanation and supporting documents.

7.2. How does your country determine which disclosures to verify?

X Annual verification plan(s)

X Periodic mandatory verification of specific categories of officials

X Random sampling of declarations

X Media reports and/or complaints from the public

Requests from law enforcement / investigative units

X Other, please describe: _____

7.3. If applicable, does the electronic financial disclosure mechanism(s) allow for automated verification (cross-checking) of information across various registers and databases held by the public and private entities, such as registries of various assets, company registers, HR, tax and real estate data, etc.? **NO**

If **YES**, please explain.

7.4. Do the competent authorities have timely and direct access to databases and information necessary to verify information in the financial disclosure? **YES**

Please explain.

The Commission has access to certain databases (cars, cadastre, etc.) which allows it to obtain data swiftly.

7.5. Do competent authorities have access to the information held by financial institutions, including bank account records? **YES**

Please explain.

According to the Law on integrity and Corruption Prevention, the Commission is entitled to request such data but must request it since no direct access exists.

7.6. Please provide the overall verification rate of financial disclosures in percentages for each applicable verification method. /

8. Sanctions

8.1. Please provide an overview of sanctions for non-compliance with financial disclosure requirements, including the sanctionable conducts, type of sanctions, forms of sanctions (administrative/criminal) and targeted officials.

A fine of between EUR 400 and EUR 1 200 shall be imposed on any person who:

- contrary to the provisions of Article 41, paragraph 2 or 3, of the Act, fails to communicate to the Commission information on his/her financial situation,
- does not enter the necessary information in the declaration of assets referred to in Articles 42 and 43 of the Act or in the supplements thereto, or enters false information,
- fails to notify the Commission of changes to the information, contrary to the provisions of Article 43(1) of the Law.

8.2. Is there any applicable statute of limitations? **YES**

Please explain. **The statute of limitations for the misdemeanour is 2 years.**

8.3. Please describe the powers available to the competent authority (responsible for verification of disclosures) to impose and enforce the sanctions described above.

The Commission is the primary authority in charge of non-criminal enforcement mechanisms for breaches of reporting duties. It can act ex officio, upon reports of natural or legal persons or upon requests of competent authorities.

Depending on the type of procedure under the Integrity and Corruption Prevention Act (IPCA), the Commission can either take enforcement measures itself, or it has to defer them other relevant authorities.

Fines for violation of specific provisions of the IPCA may be imposed directly by the Commission, using misdemeanor proceedings.

In some cases, the Commission can conduct sui generis procedures under the IPCA. This is the case for suspicion of breach of the regulations on the monitoring of assets. The Commission takes a decision at the majority of the panel of commissioners (two out of three), which is published. Possible decisions include opinions of principle, findings in a specific case or reasoned initiatives for public sector bodies to implement controls.

9. Good practices

9.1 Please provide examples of good practices in relation to financial disclosure arrangements in your country that have facilitated the recovery and restitution of the proceeds of crime.

At present, there are not many examples of this type in the country.

9.2 Do you have any case studies or examples of where a financial disclosure regime has facilitated or facilitated the recovery and restitution of proceeds of crime in your country (or for your country)? **NO**

9.3. Please provide examples of good practice in relation to the operation of the financial disclosure regime in your country, including policies and measures taken to enhance compliance with financial disclosure requirements.

There are currently not many examples of this type in the country.

10. Challenges

10. 1 What were the main challenges faced by your country in implementing the financial disclosure system(s)?

Lack of efficient information system that would allow automated connectivity with various databases which would fasten the proceedings of obtaining data in validation and other supervisory proceedings. Also, there is a lack of automated alert system that would detect any discrepancies of the reported assets with the data from the databases and notify the Commission so that it could act upon it. Furthermore, there is no automated information system that would enable swift publication of data from financial declarations that should be published according to the IPCA – at the moment the process is handled manually.

10.2. What do you consider to be the main challenges faced by the competent authorities in your country in verifying financial disclosures, including access to information on assets and financial interests abroad?

A robust information system and connectivity with other systems. Lack of established cooperation with various bodies abroad which manage financial data (etc. the Commission should request data on assets abroad through the Slovenian tax authorities and not directly and there are certain thresholds which should be met in order for the tax authorities to process such request from the Commission – i.e. the value of assets).

10.3 What are the main challenges faced by your country in imposing and enforcing sanctions for non-compliance?

At present, we still have too little case law hence difficult to state whether legal provisions are solid to stand judicial review.

11. Follow-up to the special session of the general assembly against corruption

11.1. Please describe any other measures, if any, that your country may have taken to implement paragraph 7³ of the political declaration adopted by the General Assembly at its special session against corruption held in June 2021.

No such measures taken so far.

12. Other

12.1. Please provide any other information you consider relevant to your country's legal framework and practices in connection with establishing an effective financial disclosure system that is not highlighted in the questions above.

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³ 7. We will strengthen our efforts to prevent, identify and manage conflicts of interest, including by assessing and mitigating corruption risks and through effective and transparent financial disclosure systems, with information disclosed by appropriate public officials made available as widely as possible, and we will use innovative and digital technology in this field, with due regard for data protection and privacy rights.