



UNVEILING WEAKNESSES:

A survey of challenges and strengths in asset and interest declaration, political finance, and public contracting regulations in the Western Balkans and Türkiye

March 2026



Funded by
the European Union



The Kosova Democratic Institute is a branch of
Transparency International for Kosovo

KDI's mission is to support the
development of participatory
democracy and the fight against
corruption by promoting transparency,
accountability and integrity at all levels
and sectors of society.

Unveiling weaknesses:

A survey of challenges and strengths in asset and interest declaration, political finance, and public contracting regulations in the Western Balkans and Türkiye

COPYRIGHT © 2026. Kosova Democratic Institute (KDI).

Kosova Democratic Institute reserves all rights to this report and no part of this publication may be reproduced or transmitted in any mechanical or electronic form, including photocopying or any system of storage or retrieval of any materials without the prior consent of the written publishers. The publication may be reproduced or transmitted only for non-commercial purposes. Whenever and whoever intends to use excerpts or various materials of this publication, he is obliged to clearly indicate the source whenever the excerpts or materials used are extracted.

If you have any comments, criticisms or suggestions, please contact us through any of the following options:

Address: Str. Bajram Kelmendi, Nr. 239,
10000, Prishtina, Kosovo
Tel.: +383 (0)38 248 038
E-mail: info@kdi-kosova.org
Web: www.kdi-kosova.org

Authors: Diana Metushi Krasniqi and Miloš Resimić

Methodology and Review: Transparency International.

Photo credit: Ramadan Cikaqi (KDI gara "Fotografo korrupsionin").

IPA-2022-440-922 | Integrity Watch in the Western Balkans and Turkey:
civil society combating corruption with political integrity data



**Funded by
the European Union**

This publication was funded by the European Union. Its contents are the sole responsibility of Kosova Democratic Institute.

TABLE OF CONTENTS

EXECUTIVE SUMMARY	7
Common strengths	7
Common vulnerabilities	8
Common recommendations	9
INTRODUCTION	10
1 Do Asset and Interest Declarations regulations help prevent conflicts of interests and other corruption risks in Public Office?	12
Key challenges and strengths in the Western Balkans and Türkiye	14
Recommended Collaborative Initiatives	19
2 Do Political Finance Regulations help curb undue influence of vested interests on election outcomes and elected officials?	18
Key challenges and strengths in the Western Balkans and Türkiye	20
Recommended Collaborative Initiatives	24
3 Do Public Contracting rules sufficiently protect against undue influence from politically connected individuals and entities?	24
Key challenges and strengths in the Western Balkans and Türkiye	26
Recommended collaborative initiatives	30
RECOMMENDATIONS	31
Asset and interest declarations	31
Political finance	31
Public contracting	32
NOTES	33

EXECUTIVE SUMMARY

Despite some notable political integrity reforms across the Western Balkans and Türkiye, serious concerns about the undue influence of vested interests, driven by opaque political finance systems and political favouritism in the allocation of public resources persist.¹ Corruption continues to be perceived by citizens as one of the most pressing governance challenges in the region.²

The assessment of the regulatory frameworks governing asset and interest declarations, political finance, and public contracting in Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia, and Türkiye reveals persistent

gaps in both legislation and enforcement.³ These shortcomings undermine the accountability of public officials, erode public trust in institutions, and allow unchecked conflicts of interest, patronage, and undue influence over the distribution of public contracts and other state resources.

This report identifies key common challenges and strengths in the regulations governing asset and interest declarations, political finance, and public contracting in the Western Balkans and Türkiye and offers targeted recommendations on:



1) Asset and interest declarations:

expanding the scope of declarants and reporting obligations, improving data accessibility through open formats, and strengthening verification and enforcement mechanisms.



2) Political finance:

closing loopholes related to third-party campaigning and candidate self-financing, improving data transparency through interoperable databases, and enhancing oversight, verification, and inter-agency cooperation.



3) Public contracting:

addressing legal exceptions that enable rule circumvention, introducing revolving-door restrictions, tightening rules on political donations by state contractors, and improving data availability through centralised, open-access platforms.

The report draws on primary research conducted by Transparency International chapters, published in five country reports in 2025,⁴ as well as on a desk-based analysis of legislation and secondary literature.

Common strengths

Despite persistent challenges, countries assessed in this report have made progress in certain areas of asset and interest declarations, political finance, and public procurement regulations. There are several notable strengths that provide a solid foundation for further reforms. These include:

Mandatory Asset and Interest Declarations: All countries require public officials to declare their assets, income, and potential conflicts of interest, typically extending this obligation to close family members. Additionally, the frequency of reporting obligations is reasonably well defined in most countries, with Serbia requiring submissions in two subsequent years upon leaving office as well. These provisions contribute to enhancing transparency as a key mechanism to prevent and deter corruption.

Basic safeguards against undue influence: All countries have introduced fundamental protections against undue influence, including bans on foreign (with

limited exceptions) and anonymous donations, as well as caps on corporate contributions.

Data transparency: Despite limitations in data formats, all countries except Türkiye make financial and campaign reports publicly accessible. Similarly, public procurement data transparency has been gradually improving across the region, Bosnia and Herzegovina launched an open data platform in December 2023, while North Macedonia provides detailed procurement datasets in downloadable .csv format and publishes regular “red flag” reports to identify potential corruption risks.

Digitalisation initiatives: Several countries have adopted digital tools that facilitate public access to asset and interest declarations and contracting data. For instance, North Macedonia and Kosovo have introduced electronic platforms for asset declaration submission, which are searchable and open to the public, thereby improving usability and oversight.

Common vulnerabilities

Despite some improvements, significant challenges persist, continuing to undermine political integrity and creating opportunities for undue influence by vested interests. These challenges allow opaque political finance, favouritism in public contracting, and hidden wealth and conflicts of interest to go undetected.

Limited scope, regulatory blind spots: Across all three integrity systems, asset declarations, political finance, and public contracting, the scope of regulation is too narrow to ensure comprehensive oversight. Asset declaration frameworks exclude close business associates of public officials, leaving major blind spots for hidden interests. In political finance, none of the countries regulate third-party campaigning or candidate self-financing, allowing non-contestant actors and wealthy individuals to influence elections unchecked. Similarly, procurement laws fail to address incompatibilities related to past remunerated positions, creating opportunities for revolving-door favouritism between public office and private contractors. Together, these gaps enable the continued entanglement of private and political interests across the region.

Inconsistent and incomplete reporting obligations: Reporting requirements vary widely across countries. While Kosovo has the most comprehensive asset declaration rules, covering beneficial ownership and digital currencies, all countries lack clear obligations to declare prior remunerated positions or gifts

received before assuming office, information crucial for identifying conflicts of interest. In political finance, countries differ in the frequency and scope of required reporting, with interim campaign reports often missing or published without deadlines. These inconsistencies weaken both preventive and deterrent mechanisms, allowing critical information about financial ties and influence to go unreported.

Persistent data quality and transparency challenges: Transparency remains one of the weakest aspects across all integrity systems. Asset declarations are often only partially public, and when they are, data is not published in open or machine-readable formats. In political finance, most countries release information as unstructured PDF files or partial summaries, impeding data analysis and public scrutiny. Public procurement systems show some improvement, such as open data platforms launched in Bosnia and Herzegovina and North Macedonia, yet datasets in some cases exclude key variables like number of bids and contract timelines. These fragmented and non-standardised formats limit the potential for civil society, media, and watchdogs to effectively detect red flags.

Weak verification, oversight, and enforcement: Oversight bodies across the region face systemic capacity constraints and limited mandates. Verification of asset declarations is mostly procedural, as in Bosnia and Herzegovina, where declarations are published but not cross-checked, while sanctions are often symbolic or unenforced. Political finance regulators lack sufficient financial and human resources to audit reports effectively, and delays in reviews or weak penalties further diminish accountability. In procurement, independent oversight is constrained by political interference and limited investigative powers, while enforcement of conflict-of-interest and donation bans remains inconsistent. These weaknesses create a permissive environment where corruption can flourish with minimal risk of detection or punishment.

Legal loopholes enabling undue influence and favouritism: The most pervasive vulnerability lies in the existence of legal and procedural loopholes that facilitate undue influence over public decision-making. Across the region, procurement rules can be circumvented through exceptions in legislation, interstate agreements, and special laws. Similarly, firms continue to fund political parties despite formal bans, either through indirect donations or timing loopholes that allow contributions before contract awards. These practices erode public trust, distort competition, and entrench networks of political patronage.



FOUR PILLARS FOR STRENGTHENING INTEGRITY SYSTEMS

Addressing weaknesses in asset declarations, political finance, and public procurement requires four coordinated reforms: closing regulatory loopholes, ensuring interoperable open data and transparency, strengthening oversight and enforcement, and fostering cross-agency cooperation. Together, these pillars transform fragmented compliance systems into effective, enforceable accountability frameworks.

Common recommendations

To address the key weaknesses identified in the regulatory frameworks governing asset and interest declarations, political finance, and public procurement in the Western Balkans and Türkiye, this report presents targeted recommendations for each area, grouped into three overarching thematic categories.

First, **close regulatory loopholes.** Expand the scope of regulations governing asset declarations, political finance, and public procurement to ensure comprehensive coverage of public officials, political actors, and private-sector entities involved in or influencing public decision-making. This includes extending declarant obligations to business associates and family members outside the household, regulating third-party campaign activities and candidate self-financing, and closing loopholes that allow exemptions or exceptions in public procurement laws.

Second, **enhance transparency and data accessibility through open data standards, including data interoperability.** Countries should adopt unified open data standards across integrity systems, covering asset and interest declarations, political finance reports, and public procurement contracts. Relevant information should be published in interoperable, machine-readable formats (e.g., CSV, JSON, via APIs) with unique identifiers to enable data linkage across registers, such as beneficial ownership, lobbying, and company databases. Centralised, user-friendly platforms should allow public access and bulk downloads to support monitoring and accountability.

Third, **strengthen oversight, verification, and enforcement capacities.** Independent oversight institutions, such as anti-corruption agencies, audit bodies, and election commissions, should be equipped with clear mandates, adequate human and financial resources, and unhindered access to relevant databases to verify compliance and detect irregularities. Legal provisions should require regular audits, systematic verification of data, and proportionate, dissuasive sanctions for breaches of integrity rules, including failures to declare, misreporting, or manipulation of data.

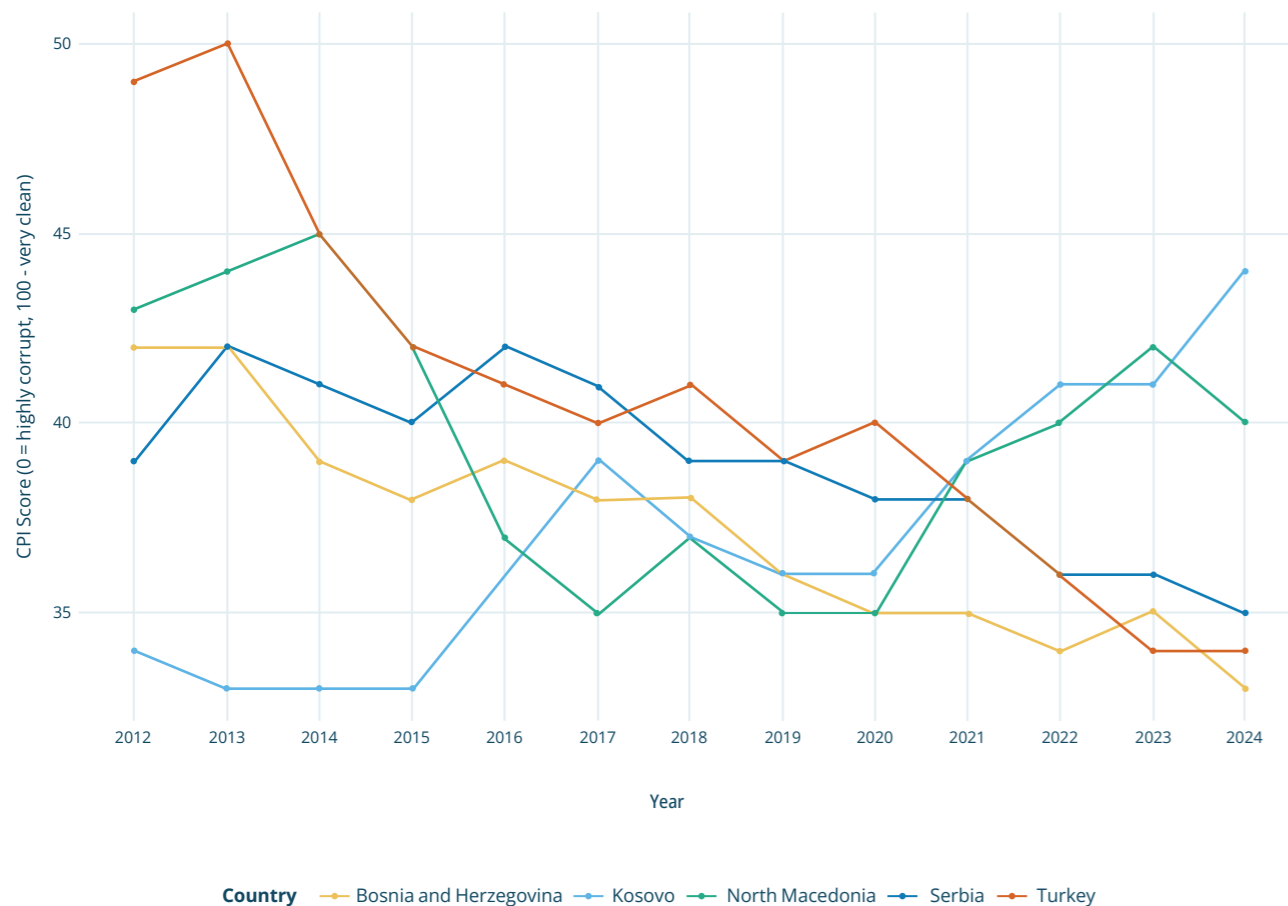
Fourth, **foster inter-agency and cross-sectoral cooperation to prevent and detect corruption.** Formal mechanisms for coordination and data exchange should be established between oversight agencies responsible for asset declarations, political finance, and public contracting, as well as with tax authorities, financial intelligence units, and the judiciary. Wider adoption and implementation of regional instruments such as the Regional Anti-Corruption Initiative's (RAI) International Treaty on Exchange of Data for the Verification of Asset Declarations⁵ can provide effective frameworks for such cooperation. Such cooperation should enable real-time sharing of information, joint investigations, and consistent enforcement. Collaboration with civil society organisations and investigative journalists should also be encouraged to enhance public oversight and detect cross-border or systemic corruption risks.

INTRODUCTION

Across the Western Balkans and Türkiye, state capture, enabled by impunity for high level corruption and tailored made laws,⁶ has been a persistent challenge. Perceptions of public sector corruption across the

region indicate uneven progress over time. While Kosovo and North Macedonia have shown slight improvements in their scores since 2020, Serbia and Türkiye have experienced sharp declines (Figure 1).

Figure 1. Corruption Perception Index (CPI) scores in the Western Balkans and Türkiye, 2012-2024.⁷




Numerous recent case studies⁸ across the Western Balkans and Türkiye illustrate how weaknesses in asset declaration, political finance, and public contracting systems continue to undermine political integrity. High-level officials have repeatedly failed to declare assets and interests, as seen in Bosnia and Herzegovina, Serbia, and North Macedonia, while loopholes in political finance regulations have allowed companies and political actors to bypass donation limits and

transparency requirements. In parallel, large-scale corruption cases in public procurement, such as politically connected firms securing non-competitive contracts in Bosnia and Herzegovina, Kosovo, and Serbia, reveal entrenched networks of favouritism and misuse of public funds. Collectively, these examples underscore the persistence of systemic vulnerabilities that allow conflicts of interest, opaque financing, and abuse of public resources to go unchecked.


This report assesses the key strengths and vulnerabilities in political integrity regulations across the Western Balkans and Türkiye, drawing on primary research conducted by Transparency International Chapters in five countries of the region. The country analyses were carried out using the methodology

developed by the Transparency International Secretariat (TI-S) based on the Integrity Watch framework, with the overall aim of identifying regulatory gaps, assessing the effectiveness of existing frameworks, and providing actionable recommendations to enhance transparency and accountability.


The scope of the analyses included:



1) Asset and interest declarations:
particularly with regards to comprehensiveness of rules requiring public officials to declare assets and interests.



2) Political finance:
focused on examining regulations governing political donations, campaign financing, and the influence of third parties in elections and political decision-making.



3) Public contracting:
focused on the potential for conflicts of interest in public procurement processes and the role of political connections in the issuance of licenses.

These three areas were selected for two main reasons. First, given the opaque political finance systems and widespread favouritism in public contracting across the region, strengthening regulations in these areas is essential for enhancing public accountability and rebuilding trust in public institutions. Second, the quality assessment of different political integrity datasets conducted by Transparency International chapters and integrated in a regional report,⁹ revealed significant shortcomings. These included poor data formats, missing or entirely absent information, and a lack of interoperability, particularly concerning lobbying registers and beneficial ownership data. These findings partly informed the selection of focus areas of this report as well as datasets for the Integrity Watch platforms, which were launched in December 2025. By providing access to the critical political integrity data, these platforms can support faster detection of the types of vulnerabilities identified in this report, such as conflict-of-interest risks and favouritism in public contracting.

Each set of regulations was assessed across 12 dimensions, categorised into three main groups:

- **Extent:** Evaluates the existence and scope of the regulations.
- **Transparency:** Examines the accessibility, comprehensiveness, and reliability of the disclosed information.
- **Accountability:** Assesses the strength of compliance mechanisms, enforcement agencies, and sanctions for breaches of political integrity.

The remainder of this report presents a comparative analysis of the strength and weaknesses of regulatory frameworks governing asset and interest declarations, political finance, and public contracting, and offers proposals for cross-border collaboration and targeted recommendations.

1. Do Asset and Interest Declarations regulations help prevent conflicts of interests and other corruption risks in Public Office?

Comprehensive and effective regulations for asset, income, and interest declaration systems are essential for detecting illicit enrichment of public officials, preventing and detecting conflicts of interest, and increasing public scrutiny and enhancing confidence in the integrity of public officials.¹⁰ Across the Western Balkans region and Türkiye, these regulations are in place but face significant challenges due to a number of gaps.

First, the coverage of public officials required to declare their assets, income, and interests is not broad enough to effectively prevent conflicts of interests or detect wealth variations. Associates or close business partners of public officials are excluded from reporting obligations in all five countries assessed in this report.¹¹ Across the region, these exclusions create significant blind spots that allow indirect financial ties and hidden interests to escape scrutiny. While the regulations in all countries tend to incorporate high-level officials and elected officials, gaps exist in some. For example, **Serbia** excludes some high-risk officials, such as directors of indirectly owned state companies and advisers to top political officeholders.¹² Family members are included in reporting obligations in all countries, although there is a variation in scope, depending on the definition of a family member. While, for example, the obligation in **Kosovo**¹³ extends to officials' spouse or extramarital partner, parents and children living in the same household, it additionally includes brothers, sisters, and other relatives living in the same household in **North Macedonia**.¹⁴

Second, reporting obligations vary in scope and frequency of disclosure across the Western Balkans and Türkiye. While **Kosovo** has the most comprehensive requirements,¹⁵ mandating disclosure of beneficial ownership, digital currencies, and donations to political entities, alongside standard information on assets, income, and liabilities, none of the countries assessed requires officials to disclose prior remunerated positions, even though such information is essential to identifying potential conflicts of interest arising from past private-sector ties.¹⁶

Third, serious data quality and accessibility issues persist across the region. In **Türkiye**, asset declarations are not publicly available, while in **Bosnia and Herzegovina** only those of elected officials are published, and in

Serbia much of the data is withheld from the public register. **Kosovo** and **North Macedonia** provide broader online access, publishing most submitted information, yet none of the countries publishes the information in formats suitable for bulk downloads.¹⁷ This lack of standardised, accessible publication undermines transparency and limits the potential for effective public oversight and scrutiny.

Fourth, verification and enforcement mechanisms remain weak across the region. In **Bosnia and Herzegovina**, the Central Election Commission (CIK) publishes declarations but neither verifies their accuracy nor cross-checks data with other registries, leaving oversight largely procedural. In **Serbia**, the Anti-Corruption Agency (ASK) conducts limited reviews, yet its verification process is confidential, and sanctions are rarely upheld in court. Common challenges across all countries include limited institutional capacity, low and non-dissuasive sanctions, and cumbersome procedures for accessing data from other institutions. **Türkiye** stands out for lacking both a dedicated oversight body and a digital reporting system.¹⁸ Overall, weak institutional capacity, inadequate penalties, and the absence of systematic verification create significant accountability gaps, enabling undeclared assets and conflicts of interest to persist undetected.

Despite notable challenges, countries analysed in this report provide a solid foundation for detections of conflicts of interest and variations of wealth of high-risk public officials' roles, as they all require regular submissions of asset and interest declarations from at least high-risk public officials and elected officials. For instance, recent reforms in **North Macedonia** have brought areas of asset declarations and conflicts of interest under one legal framework and empowered its anti-corruption agency to request declarations from individuals even beyond the scope of the law, under certain conditions. The frequency of reporting obligations are reasonably defined in most countries, typically requiring submission upon taking and leaving office and in case of significant changes, with **Serbia** requiring it also two subsequent years upon leaving office.¹⁹

Nevertheless, closing existing gaps is essential to strengthen scrutiny of public officials and prevent instances of incomplete or inaccurate declarations, as well as non-compliance with legal obligations, which persist due to weak verification, limited oversight, and lenient sanctions, as illustrated by case studies from across the region (see Box 1).

Box 1. Failure to declare assets, interests, and income in the Western Balkans and Türkiye



In **Bosnia and Herzegovina**, former Minister of Security, Nenad Nešić failed to report an apartment and a house he jointly owned in Serbia with his wife, despite being legally required to do so in a declaration prior to assuming the position of minister in 2023.²⁰



In **Kosovo**, the State Prosecution filed an indictment in 2022 against the then Minister of Industry, Entrepreneurship and Trade, Rozeta Hajdari, for failure to declare assets.²¹ In December 2022, the Basic Court in Prishtina found her guilty and imposed a €700 fine.²²



In **North Macedonia**, a report by the Centre for Civil Communications (CCC) revealed instances of politically exposed persons (including mayors and ministers) failing to declare company ownerships in their interest declarations, based on an analysis of the register of beneficial owners.²³



In **Serbia**, current Belgrade Mayor Aleksandar Šapić, purchased a €820,000 worth villa in Trieste in 2018, while serving as president of the New Belgrade municipality, but failed to report it to the Agency for Prevention of Corruption (APC), as required by law.²⁴



In **Türkiye**, former Kırklareli Governor Osman Bilgin came under investigation after an internal inspection found that the declared assets of him and his family could not be justified by their officially reported income, and that several properties had been declared at values far below their market price.²⁵ Inspectors identified significant discrepancies between the family's income and asset acquisitions during the period from May 2018 to February 2024.²⁶

Key challenges and strengths in the Western Balkans and Türkiye

In **Bosnia and Herzegovina**, the legal framework requires high-level public officials, including country and entity presidents, MPs, and municipality and city mayors, to submit detailed financial reports, and elected officials at all government levels to declare assets within 30 days of assuming office.²⁷ While the Electoral Law mandates inclusion of family members living in the same household, associates and close business partners are excluded,²⁸ increasing the risk of undisclosed conflicts of interest. This risk is compounded by BiH's complex governance structure, as conflict-of-interest legislation is fragmented across the state, entity, and district levels,²⁹ which undermines prevention, enforcement, and overall transparency and accountability.

Although reporting obligations provide a basic foundation for transparency and enable detection of conflicts of interest by requiring disclosure of property, income, debts and shares, they exclude information on past remunerated positions and beneficial ownership.³⁰ This limits the comprehensive detection of conflicts of interest and unexplained wealth. The current framework obliges officials to declare assets, interests, and liabilities within 30 days of taking and leaving office but does not mandate updates on significant changes during tenure.³¹ Most declarations are not publicly available, except for those of elected officials, which are published individually on the Central Election Commission (CEC) website in formats not suitable for bulk downloads, requiring web scraping to gather the data in a database.³² For other public officials, transparency is even weaker: a central register at the state level has not been established yet, and only the Brčko District and some cantons maintain publicly accessible registers.³³

Although CEC provides instructions and templates for submitting declarations³⁴ and is responsible for publishing them online,³⁵ it is not responsible for the accuracy of submitted declarations: it neither verifies their accuracy nor cross-checks data with other institutions or registries, such as beneficial ownership or business databases.³⁶ This lack of verification and data exchange limits public scrutiny, weakens accountability, and leads to inconsistent enforcement. While financial penalties exist for non-submission, fines are minimal, and CEC has no clear mandate to investigate discrepancies or omissions.³⁷ Therefore, deterrence remains weak due to small fines, the absence of

verification, and the ineffective implementation of conflict-of-interest rules.³⁸

These findings are echoed in the 2024 European Commission (EC) Rule of Law Report, which notes that effective implementation of conflict-of-interest rules and verification of asset declarations occurs only in Sarajevo Canton.³⁹ The state-level Commission on Conflict of Interest, established in 2023, remains ineffective and has not issued any sanctions.⁴⁰ However, some positive developments have been observed in the Brčko District and Sarajevo Canton, where several sanctions for conflicts of interest have been initiated.⁴¹

In **Kosovo**, the law requires senior⁴² and public⁴³ officials to declare their assets. Family members are included, but limited to those living in the same household, including a spouse or extramarital partner, parents and children.⁴⁴ Associates are excluded, risking that indirect or concealed interests remain undisclosed, allowing potential conflicts of interest to go undetected.⁴⁵

Regarding transparency, reporting obligations in Kosovo are relatively comprehensive, covering assets, income, shares, beneficial ownership, secondary employment, liabilities, donations to political entities, digital currencies⁴⁶ — but not prior remunerated positions.⁴⁷ Publicly available data excludes some personal information, including officials' family members' names, and must be published within 30 days from the expiration of the deadline for submitting declaration.⁴⁸ Officials are required to declare assets upon taking office (within 30 days), annually, and upon leaving office.⁴⁹ Declarations remain publicly accessible for three years after the end of the reporting obligation, after which they are removed.⁵⁰ The data are published on the Agency for Prevention of Corruption's (APC) website through a centralised platform, but only as individual, searchable PDFs, which are not suitable for bulk downloads.⁵¹

Regarding accountability, the law does not explicitly require the APC to provide advisory support to officials on the reporting process,⁵² which may lead to inconsistent or incomplete declarations. Declarations are submitted electronically through the Agency's system, and the APC is responsible for monitoring, control, and verification.⁵³ Each year, the APC conducts full audits for at least one-third of senior officials and up to 500 public officials, selected by lot.⁵⁴ When irregularities are identified, officials have 15 days to provide an explanation; if none is provided or the

justification is unconvincing, the case is referred to the prosecution.⁵⁵ The APC also carries out targeted audits based on risk indicators, such as significant increases in assets or a history of non-compliance.⁵⁶ Although the Agency has legal powers to verify declarations, request additional information, and conduct administrative investigations, limited resources constrain its capacity to perform comprehensive checks.⁵⁷

The latest EC Rule of Law Report also underscores the need to strengthen the use of asset declarations as a tool to combat high-level corruption.⁵⁸

In **North Macedonia**, since 2019, a single comprehensive law⁵⁹ regulates the areas of asset declarations and conflicts of interest.⁶⁰ The obligation to report assets and interests applies to a broad range of officials, including elected and appointed representatives at the national and local levels, as well as heads of public enterprises and institutions.⁶¹ In addition, the State Commission for the Prevention of Corruption (SCPC) may, based on a corruption risk assessment, request the persons with special authorisations obligation to submit asset and interest declarations.⁶² It can also request declarations from individuals not covered by the law when they are involved in the case examined by the Agency.⁶³ This broad mandate enables SCPC to act proactively, extending oversight beyond the standard group of public officials. However, while officials must declare the assets of family members⁶⁴ living in the same household, the requirement does not extend to associates, or family members residing elsewhere,⁶⁵ creating loopholes that allow conflicts of interest and unexplained wealth to go undetected—similar to trends observed in other countries analysed in this report.

Reporting obligations help detect conflicts of interest and unexplained wealth by requiring disclosure of assets, income, liabilities, and secondary employment. However, the lack of information on prior remunerated positions and beneficial ownership limits effective detection.⁶⁶ While deadlines exist for submitting declarations—upon taking and leaving office and after significant changes⁶⁷—no clear timeline is set for their publication on the SCPC website.⁶⁸ The data are available online⁶⁹ in an html format, searchable by keywords, but bulk downloads are not possible.⁷⁰

Regarding accountability, SCPC is responsible for receiving, recording, and monitoring asset and interest

declarations, and has issued a Rulebook on their submission and reporting of changes.⁷¹ Although SCPC's resources have increased over the past five years, it still lacks sufficient human resources to effectively verify declarations.⁷² While it has direct access to data from some institutions, it must request information from others, delaying verification.⁷³ Monetary sanctions for non-submission or failure to report changes remain low and largely ineffective as a deterrent.⁷⁴

The 2025 EC Rule of Law Report echoes these concerns, noting that limited resources continue to undermine SCPC's verification capacity and that the number of systematic asset checks declined between 2023 and 2024.⁷⁵

In **Serbia**, the Law on Prevention of Corruption⁷⁶ regulates the reporting of assets, income, and conflicts of interest. Reporting obligations extend to officeholders' spouses or extramarital partners, and minor children, provided they live in the same household.⁷⁷ An authentic interpretation of the law in 2021 narrowed the scope of officials covered by the legislation, excluding, for example, directors of indirectly owned state companies.⁷⁸ A number of potentially high-risk individuals, such as advisers to the president, prime minister, and ministers, as well as heads of cabinet, are also excluded from reporting obligations.⁷⁹ Moreover, no asset declaration rules apply to public administration employees, even those in high-risk positions, with only limited exceptions.⁸⁰

Regarding transparency, reporting obligations help detect conflicts of interest by requiring officials to disclose information about income from all current public and private positions, deposits, and shares in legal entities, among other assets.⁸¹ However, they exclude previous remunerated positions and valuable gifts received before assuming office, which may create potential conflicts of interest during the official's mandate.⁸² Information is only partially available to the public through the register maintained by APC: for example, the register provides the information about the existence of bank deposits but not their amount, and omits most income sources other than those from the state budget and other public sources.⁸³ Officials are required to submit declarations upon taking office, after significant changes,⁸⁴ upon leaving office, and again in the two subsequent years.⁸⁵ As an additional safeguard, former officials must seek APC's approval before entering into employment or business relationships with companies that previously cooperated with the public

institution in which they served.⁸⁶

The data are published in an html format, which is not suitable for bulk downloads and requires web scraping to compile information in a database.⁸⁷ Information on former officials remains available for three years after they leave office, after which it is deleted and cannot be accessed even through FOIA requests.⁸⁸

Regarding accountability, the APC is responsible for verifying the accuracy, completeness, and timely submission of asset declarations in line with its annual inspection plan.⁸⁹ It provides reporting guidelines to officials, and submissions have to be made electronically and by post.⁹⁰ Although both administrative and criminal sanctions exist, the verification process is confidential, preventing external assessment of its quality.⁹¹ Public institutions are legally required to grant APC access to their databases upon request; however, this obligation does not extend to banks and financial institutions.⁹² Sanctions remain weak deterrents, as few violations are identified, proceedings are lengthy, and most criminal charges are ultimately dismissed.⁹³

In **Türkiye**, the Law No. 3628⁹⁴ on Declaration of Property and Combatting Bribery and Corruption covers the asset declarations and conflicts of interest. The law requires high-risk public officials — including, among others, ministers, senior public officers, and elected officials at both national and subnational levels,⁹⁵ to declare their assets, with the obligation extending to their spouses and dependants.⁹⁶ However, it does not cover associates such as business partners connected through family ties, creating a loophole that allows potential conflicts of interest and illicit enrichment to go undetected.⁹⁷

With regards to transparency, the detection of conflicts of interest is supported by requirements to report various assets and interests.⁹⁸ However, officials are not obliged to disclose secondary employment, prior remunerated positions, company shares, beneficial ownership, or other outside activities, leaving the space for undetected conflicts of interest and illicit enrichment to go undetected.⁹⁹ Declarations must be submitted upon taking office¹⁰⁰ and every five years thereafter, with updates required only in cases of significant change.¹⁰¹ Asset declarations are not published online, and the law protects their confidentiality, meaning that declarations generally remain sealed unless an investigation is initiated.¹⁰²

Regarding accountability, Türkiye lacks a digital reporting system, and the law does not assign any institution the responsibility for developing or maintaining one.¹⁰³ Nor does it require the creation of standardised reporting guidelines to help officials submit consistently, which reduces efficiency and increases the risk of incomplete or inaccurate reporting.¹⁰⁴ The legislation does not grant any agency functional independence or a comprehensive mandate for monitoring, verification, and enforcement.¹⁰⁵ Instead, different categories of officials submit declarations to different authorities.¹⁰⁶ The Council of Ethics for Public Service may verify declarations when deemed necessary, and individuals and organisations, including banks, are required to provide requested information within 30 days.¹⁰⁷ However, the law sets no clear timelines or procedures for reviewing or verifying declarations, which limits effective oversight.¹⁰⁸ Although administrative and criminal sanctions exist for late submission, non-compliance, or false reporting, the law lacks clarity on how investigations are initiated, including procedures for random audits or proactive monitoring.¹⁰⁹

Although asset declarations are formally required from a broad range of public officials, limited public access undermines their effectiveness as a transparency tool. In practice, these declarations remain confidential and are only accessible within the framework of formal investigations, restricting routine scrutiny by civil society, journalists, and researchers. In recent years, some political candidates have voluntarily disclosed their asset declarations during election periods, often in response to transparency initiatives led by civil society organizations such as Transparency International Türkiye. However, participation in such voluntary disclosure efforts has remained minimal.

Table 1. Extent, transparency and accountability in asset, interest and income declaration systems in the Western Balkans and Turkey: Selected assessment questions.¹¹⁰

Dimension	Assessment question	Bosnia and Herzegovina	Kosovo	North Macedonia	Serbia	Türkiye
Extent	Are public officials required to submit asset and interest declarations concerning their associates?	No	No	No	No	No
	Are children living outside the family household covered by the declaration requirements?	No	No	No	No	No
Transparency	Are officials required to disclose information on beneficial ownership?	No	Yes	No	No	No
	Are officials required to declare any previously held remunerated positions?	No	No	No	No	No
	Are contracting authorities required to make ad hoc declarations of the absence of conflict of interest regarding their relationships with specific bidders or applicants at the onset of the contracting process?	Yes	No	Yes	No	No
	How long is the data retained in the public database?	Not explicitly regulated ¹¹¹	Three years after declarants leave office	Available only while declarants are in office	Three years after declarants leave office	The data is not publicly available
Accountability	Which body is designated to receive asset and interest declarations?	Central Election Commission (CEC)	The Agency for Prevention of Corruption (APC)	State Commission for Prevention of Corruption (SCPC)	The Agency for Prevention of Corruption (APC)	Decentralised system
	Is guidance provided to officials for the submission of declarations?	Yes	No	Yes	Yes	No

Recommended Collaborative Initiatives

Countries in the Western Balkans and Türkiye could strengthen asset declaration systems through regional cooperation and data exchange. A promising model already exists: in March 2021, North Macedonia, Montenegro, and Serbia signed the International Treaty on Exchange of Data for the Verification of Asset Declarations, as part of the initiative jointly implemented by the Regional Anti-Corruption Initiative (RAI) and UNODC.¹¹² The treaty enables anti-corruption bodies to formally exchange information on foreign assets and interests, thereby improving cross-border verification. Expanding this framework to include other countries in the region and beyond would create a strong deterrent against concealing wealth abroad, especially in light of numerous cases—some discussed in this report—where officials have failed to declare property or financial interests in neighbouring countries.

2. Do Political Finance Regulations help curb undue influence of vested interests on election outcomes and elected officials?

Political finance is particularly vulnerable to corruption, as unchecked and opaque funding of political parties and candidates enables vested interests to exert undue and disproportionate influence over policy makers.¹¹³ In the absence of transparency and effective oversight, such influence can distort lawmaking and the allocation of public resources, leading to state capture and eroding public trust in institutions.¹¹⁴

Robust regulation is, therefore, essential to ensure a level playing field among political contestants, and to prevent the misuse of money to sway election outcomes or shape policy agendas.¹¹⁵ The countries in the Western Balkans and Türkiye assessed in this report have established political finance regulations and made some progress toward aligning their legislation with EU and international standards.¹¹⁶ However, despite recent improvements, significant gaps remain.

First, the existing legislative framework across the region allows for the abuse of non-contestant campaigning. Only **Bosnia and Herzegovina** and **Serbia** have outlawed donations made through third parties, yet none of the countries regulate third-party campaigning, leaving loopholes for hidden influence on the electoral process and increasing the risk of foreign interference.¹¹⁷ The urgency of addressing this gap is underscored by growing international momentum: in December 2025,

the Conference of States Parties to the United Nations Convention against Corruption adopted a Resolution 11/7 calling on states to regulate entities that finance campaign-related communication activities and to require disclosure of those funding such activities.¹¹⁸

Second, further gaps exist in the scope of coverage. None of the countries regulate candidate self-financing, which creates an uneven playing field favouring wealthier candidates.¹¹⁹ Although all countries impose limitations to donations from companies winning public contracts, in line with international commitments,¹²⁰ most contain loopholes that allow for potential undue influence. For instance, while **Kosovo** bans donations from firms that have won public tenders for up to three years after contract award,¹²¹ this still allows firms to donate while bidding in public procurement, undermining the intent of the restriction.

Third, while all countries require financial reporting, only **Bosnia and Herzegovina**, **North Macedonia**, and **Serbia** mandate the submission of interim campaign reports in line with international commitments.¹²² However, **North Macedonia** does not stipulate specific deadlines for publishing these reports, thereby limiting public scrutiny. Furthermore, none of the countries assessed publish annual or campaign reports in open data formats suitable for bulk downloads, and the available data lacks interoperability, limiting its reuse and integration across platforms. While **Serbia** provides data in html format, **Bosnia and Herzegovina**, **Kosovo**, and **North Macedonia** publish only individual PDF documents, and the situation is worst in **Türkiye**, where only summary audit reports are published, omitting key details such as donor identities and contribution amounts, despite major political parties having prepared their financial reports in line with international accounting standards since the mid-2010s.¹²³

Fourth, across the Western Balkans and Türkiye, a persistent shortage of human, financial, and technical resources among key oversight bodies severely limits effective control of political finance, contrary to international commitments.¹²⁴ Country-specific challenges further weaken enforcement, including delayed audits in **Kosovo**, burdensome reporting obligations in **North Macedonia**, slow responses of oversight bodies to CSO complaints and weak sanction enforcement in **Serbia** and **Bosnia and Herzegovina**, and a limited verification mandate in **Türkiye**.¹²⁵ Collectively, these factors undermine both oversight effectiveness and the deterrent impact of sanctions.

Despite persistent challenges, there are some notable

strengths in the political finance legislative frameworks across the Western Balkans and Türkiye. All countries have introduced basic safeguards against undue influence, including bans on foreign (albeit with some exceptions) and anonymous donations, as well as caps on corporate contributions.¹²⁶ Despite limitations in

data formats discussed earlier, all countries except **Türkiye** make financial and campaign reports publicly available.¹²⁷ For example, **North Macedonia** requires that the State Audit Office (SAO), the Public Revenue Office (PRO), and political parties regularly publish donation data on their websites.¹²⁸

Nevertheless, closing existing gaps remains essential to ensure transparency and accountability in political finance regulation across the region. Evidence of rule circumvention, undue influence, and even deliberate violations, exacerbated by legal loopholes and weak enforcement, underscores the urgency of strengthening oversight and sanctions (see Box 2).

Box 2. Political finance across the Western Balkans and Türkiye: Examples of vulnerabilities



In **Bosnia and Herzegovina**, an analysis by Transparency International Bosnia and Herzegovina revealed instances of political officeholders donating above the legal limit and companies that had won public tenders worth more than the legal limit which allows them to donate.¹²⁹



In **Kosovo**, the value of political donations is reportedly higher than officially declared, as firms exploit loopholes to bypass existing legislation.¹³⁰ There are also indications of companies receiving public contracts shortly after donating to political parties in 2021, suggesting potential circumvention of corporate donation limit rules.¹³¹



In **North Macedonia**, ahead of the October 2025 local elections, only 35% of all participants in the electoral campaign submitted their mandatory donation reports within the legally prescribed deadline, undermining transparency.¹³²



In **Serbia**, the Centre for Investigative Journalism of Serbia (CINS) uncovered that the Serbian Progressive Party (SNS) allegedly organised and financed a call centre in late 2023, ahead of the December elections.¹³³ However, related expenses—including staff costs and office leasing—were not reported to the Agency for Prevention of Corruption (APC).¹³⁴ The agency ultimately declined to initiate proceedings, citing a lack of evidence linking SNS to the financing and organisation of the call centre.¹³⁵



In **Türkiye**, transparency is hindered because the Supreme Election Council does not publish its audit reports of presidential election campaign donations, and the Constitutional Court's reports on political party finances contain only aggregated totals of donations rather than breakdowns by individual donor.¹³⁶

Key challenges and strengths in the Western Balkans and Türkiye

In **Bosnia and Herzegovina**, political finance is governed by the Election Law, the Law on Political Party Financing, and two accompanying rulebooks.¹³⁷ While political parties and candidates are subject to the same reporting obligations¹³⁸ and donations through third-parties are prohibited, third-party campaigning remains unregulated, creating a loophole for hidden influence.¹³⁹ Although some safeguards exist to prevent undue influence of vested interests, such as banning donations from foreign states, political parties, and companies,¹⁴⁰ foreign individuals are not included,¹⁴¹ and private firms that win public procurement contracts may still donate within certain annual limits.¹⁴² Additionally, the lack of regulation on party candidates' self-financing raises concerns about the potential advantage of wealthy candidates.¹⁴³

Regarding transparency, reporting obligations are relatively comprehensive, requiring political parties and independent candidates to disclose both monetary and in-kind contributions, including sources such as public funding, private donations and loans. However, beneficial ownership, in cases of transactions with legal entities, is not regulated, allowing vested interests to hide behind opaque corporate structures and bypass donation limits.¹⁴⁴ Parties and independent candidates must report all incomes and expenditures, detailing donor or supplier names, dates, and the value of each transaction.¹⁴⁵ They are also required to submit annual financial reports,¹⁴⁶ pre-election reports,¹⁴⁷ campaign account transaction reports, and post-election financial reports.¹⁴⁸ Although the Central Election Commission (CEC) publishes these reports online, the format—individual PDFs—limits usability and prevents bulk downloads.¹⁴⁹ Additionally, while parties are legally required to publish the same data on their websites, this obligation is frequently ignored in practice.¹⁵⁰

Regarding accountability, reporting forms are prescribed by bylaws, and while the CEC provides information and guidelines, formal advisory services for report submissions are not explicitly regulated.¹⁵¹ The CEC is responsible for monitoring compliance with political finance regulations, conducting investigations, and issuing sanctions.¹⁵² However, its effectiveness is hampered by persistent shortages in human and financial resources, limiting its capacity to conduct timely audits, thereby weakening overall accountability.¹⁵³ Although sanctions are in place and

occasionally applied, enforcement processes are often slow, diminishing their deterrent effect.¹⁵⁴

The latest EC Rule of Law report highlights the need for Bosnia and Herzegovina to ensure transparency of political party financing and notes a lack of integrity of the electoral process.¹⁵⁵

In **Kosovo**, political finance rules are governed by the Law on General Elections, the Law on the Financing of Political Parties, and several related laws and regulations.¹⁵⁶ Both political parties and independent candidates are subject to the same reporting and disclosure obligations. However, gaps remain, as candidate self-financing, donations through third parties, and third-party campaigning are not explicitly regulated, leaving room for unmonitored campaign spending and indirect campaign support without reporting obligations.¹⁵⁷ The system also creates a somewhat uneven playing field: public funding, distributed based on election results, tends to benefit the incumbents and larger parties over smaller or new entrants.¹⁵⁸ Some safeguards exist to limit the influence of vested interests, such as a ban on donations from private firms that have won public procurement contracts within the previous three years.¹⁵⁹ In addition, donations from foreign or anonymous sources are prohibited, and limits are imposed on both corporate donations and campaign spending.¹⁶⁰

Regarding transparency, political parties and independent candidates are required to report both monetary and in-kind contributions.¹⁶¹ The law mandates the use of dedicated bank accounts for managing finances, though it does not require the involvement of professional accountants for bookkeeping.¹⁶² While legislation requires that submitted financial reports undergo audits, reporting obligations are limited to annual financial reports and election campaign finance reports, with no requirement for interim reporting during the campaign period, thus limiting real-time public scrutiny.¹⁶³ The Central Election Commission (CEC) publishes both financial and campaign reports on its website, but only as PDF documents, which are not suitable for bulk downloads.¹⁶⁴

Regarding accountability, the CEC serves as the primary oversight body and provides templates for financial reporting; however, the guidelines lack sufficient detail, which can lead to inconsistencies in reporting.¹⁶⁵ The CEC and the Agency for Prevention of Corruption (APC)

face challenges stemming from limited funding, the need for staff training, and insufficient technological infrastructure, all of which hinder their effectiveness.¹⁶⁶ For example, while the CEC is mandated to review financial reports, conduct audits, and sanction non-compliance, its operational capacity constraints limit its ability to carry out these responsibilities effectively.¹⁶⁷ The capacity of both agencies to verify compliance with political finance regulations is further undermined by resource shortages, technological limitations, and weak inter-agency coordination.¹⁶⁸ Breaches are often difficult to detect due to delayed audits, and existing sanctions are generally too weak to serve as an effective deterrent.¹⁶⁹

In **North Macedonia**, political finance is regulated by the Law on Financing of Political Parties and the Electoral Code.¹⁷⁰ While the same reporting obligations apply to political parties and individual and candidates of political parties, candidate self-financing, donations through third parties, and third-party campaigning are not explicitly regulated.¹⁷¹ The rules governing public funding create an uneven playing field, disadvantaging smaller parties, as only 30% of public funds are distributed equally among parties that received at least 1% of the turnout vote in the last parliamentary elections.¹⁷² Some safeguards against undue influence from vested interests exist, such as a ban on donations from private firms that have won public procurement contracts.¹⁷³

Regarding transparency, annual financial statements must include total income and expenditures by category but not itemised individual expenditures.¹⁷⁴ All incomes and expenditures must go through designated bank accounts, while the responsibility for receiving and publishing financial reports is divided among several institutions. The State Audit Office (SAO) and the Public Revenue Office (PRO) publish donation data on their websites, and political parties are also obliged to do so. Annual balance sheets are submitted to the SAO, PRO, and Central Register, and published on party websites. Annual financial reports are sent to the SAO and also published online by parties.¹⁷⁵ Election campaign reports are submitted to the State Election Commission (SEC), SAO, and the SCPC, all of which are responsible for publishing them on their websites.¹⁷⁶ Interim campaign reports, including post-election reports, are also required. However, there are no specified deadlines for making these reports publicly available.¹⁷⁷ While the information is publicly accessible, it is provided as scanned PDFs, making it unsuitable for

bulk downloads.¹⁷⁸

Regarding accountability, while templates for financial reporting exist, there is no standardised system for political entities to submit their reports. The SAO is responsible for auditing both annual and campaign reports and can initiate proceedings in case of irregularities.¹⁷⁹ The SCPC and SAO are the two key oversight bodies for monitoring political finance. Although their human and technical capacities have improved over the years, further resources are still required.¹⁸⁰ The reporting system is reportedly burdensome, and no political entities consistently submit all required periodic reports, despite legal obligations.¹⁸¹ Additionally, coordination among oversight bodies remains insufficient, hindering a timely data exchange and effective enforcement.¹⁸²

The latest EC Rule of Law report also notes challenges with political financing, particularly with regards to inadequate legislative framework and resource and expertise constraints, which limit the effective oversight of political financing.¹⁸³

In **Serbia**, political finance is regulated by the Law on Prevention of Corruption and the Law on Financing of Political Activities.¹⁸⁴ The legal framework creates an uneven playing field by allowing the use of regular funding for election campaigns, not setting spending limits for election campaigns per participant and prescribing late deadlines for disbursement of these funds during the election process, hindering effective use by political contestants, thereby putting new political competitors and parties with no representatives in the parliament in the disadvantageous position.¹⁸⁵ While the legislation includes safeguards against the undue influence of vested interests, such as banning donations from companies and entrepreneurs providing services of general interest, these restrictions apply only to long-term utility service providers.¹⁸⁶ Although political parties and individual candidates are subject to the same reporting obligations and donations through third parties are banned, there are no explicit regulations addressing candidate self-financing or third-party campaigning.¹⁸⁷

Regarding transparency, political entities are required to submit two election campaign reports,¹⁸⁸ which are published on the Agency for Prevention of Corruption (APC) website. However, political parties are not legally obliged to publish these reports on their own

websites.¹⁸⁹ The reports must include the origin, amount, and the structure of income and expenditures from public and private sources, credits and loans. Although individual expenses are reported, errors are common, for example, misclassifying costs under incorrect categories.¹⁹⁰ Political entities are required to submit annual financial reports to the APC and record on their websites any donations exceeding the annual level of net monthly salary.¹⁹¹ Legal deadlines are in place to ensure timely publication of both campaign and annual financial reports on APC website.¹⁹² While the data is available in HTML format, it is not suitable for bulk downloads.

Regarding accountability, the APC has adopted a rulebook that defines the procedures for maintaining records on donations and property of political entities, as well as the format and content of reports.¹⁹³ While APC is mandated to verify the accuracy of annual and election campaign reports, the law lacks detailed provisions on the subject and scope of financial oversight. Moreover, the agency's effectiveness is limited by insufficient budget, staffing, and office space.¹⁹⁴ APC is also slow to respond to complaints submitted by civil society organisations' observers and provides only aggregate data in its annual reports on initiated proceedings and court outcomes, without detailing specific irregularities.¹⁹⁵ The law also stipulates that the State Audit Institution (SAI) conducts audit of the "appropriate number" of political entities that have parliament representatives, but it does not specify what does "appropriate number" mean.¹⁹⁶ Sanctions are weak overall, with APC often resorting to warnings even in cases of repeated violations.¹⁹⁷

The latest EC Rule of Law report echoes these points, highlighting challenges with the absence of campaign spending limits and the effectiveness of oversight, among other issues.¹⁹⁸

In **Türkiye**, political finance rules are outlined in the Law on Political Parties, the Law on Basic Provisions on Elections and Voter Registers and several others.¹⁹⁹ While political parties are subject to reporting obligations, campaign finance rules are comprehensive mainly for presidential candidates; for other candidates and third parties, regulation and disclosure remain limited and fragmented.²⁰⁰ Additionally, key areas, such as donations to individual candidates and candidates of political parties, candidate self-financing, donations made through third parties, and third-party campaigning are not explicitly regulated.²⁰¹ These regulatory

gaps create significant loopholes that allow for indirect and opaque campaign financing, undermining transparency and accountability. High donation limits for natural persons²⁰² create room for undue influence by enabling companies to bypass corporate donation caps through affiliated individuals.

Regarding transparency, political parties are required to submit financial reports annually or upon request by the Constitutional Court. These reports must include income from public subsidies, private donations, loans, and other sources. However, the legislation does not mandate the disclosure of beneficial owners of donating legal entities, creating additional opportunities to circumvent donation caps and exert undue influence.²⁰³ For presidential elections, the reporting period is legally defined (from finalisation of candidacy to final results), and candidates submit reports after the final results within the statutory timeline.²⁰⁴ The legislation also does not require itemised expenditures (e.g. identifying vendors or specifying types of expenditures, such as advertising),²⁰⁵ and there is no interim campaign finance reporting; reporting occurs post-election, limiting pre-election transparency.²⁰⁶ The legislation, however, mandates that political parties and presidential candidates manage their income and expenditure through designated bank accounts.²⁰⁷ Reports are not published in a timely manner, limiting public scrutiny, and are made available only as audit reports on the Constitutional Court's website, omitting key information such as donor names and donation amounts.²⁰⁸

Regarding accountability, there are no digital reporting systems in place to facilitate the submissions of financial reports.²⁰⁹ The Constitutional Court and the Supreme Board of Elections hold oversight responsibilities, but both lack the functional independence necessary for effective enforcement. The Constitutional Court is responsible for auditing the annual financial reports of political parties; however, it does not have a strong mandate to verify the accuracy of submitted information, such as by cross-referencing with other databases.²¹⁰ Similarly, the Supreme Board of Elections, which oversees campaign finance reporting, does not perform cross-checks with external data sources, limiting its ability to detect discrepancies or enforce compliance effectively.²¹¹

Table 2. Extent of coverage, transparency and accountability of political finance regimes in the Western Balkans and Türkiye: Overview of selected assessment questions.²¹²

Dimension	Assessment question	Bosnia and Herzegovina	Kosovo	North Macedonia	Serbia	Türkiye
Extent	Are donations through third-parties allowed?	No	Not explicitly regulated	Not explicitly regulated	No	Not explicitly regulated
	Is third-party campaigning allowed?	Not explicitly regulated	Not explicitly regulated	Not explicitly regulated	Not explicitly regulated	Not explicitly regulated
Transparency	Is there an obligation for interim campaign reports?	Yes	No	Yes	Yes	No
	In which formats are the data published?	PDF	PDF	PDF	Digital text: html	Audit reports summaries
Accountability	Who is the designated body for receiving reports?	Central Election Commission (CEC)	The Central Election Commission (CEC)	Multiple bodies (The State Audit Office (SAO) and the Public Revenue Office (PRO) State Commission for Prevention of Corruption (SCPC))	The Agency for Prevention of Corruption (APC)	The Constitutional Court and the Supreme Board of Elections (SBE)
	Are there sufficient resources to conduct audits?	No	No	No	No	No

Recommended Collaborative Initiatives

Regional cooperation can provide important contributions to strengthening the transparency and accountability of political finance in the Western Balkans and Türkiye. For example, with the support of international partners, the countries in the region could maintain a regional database of politically exposed donors and affiliated businesses.

Another avenue for cooperation would be peer learning and capacity-building among oversight institutions, including election commissions, audit bodies, and anti-corruption agencies. Regular joint training programmes and peer reviews on campaign finance auditing, digital advertising oversight, and risk-based verification would help harmonise standards and strengthen institutional capacity. Adopting a common regional template for financial disclosures could further facilitate comparability and reduce administrative burdens, ensuring greater consistency and interoperability of data across borders.

3. Do Public Contracting rules sufficiently protect against undue influence from politically connected individuals and entities?

Academic and policy studies have demonstrated that public procurement is highly vulnerable to corruption.²¹³ Without strong legal and regulatory safeguards, procurement systems can be exploited for political favouritism, undermining fair competition, public trust, and the efficient use of public funds.²¹⁴ This often results in inflated contracts awarded to politically connected firms and lower-quality goods and services, as numerous cases from across the Western Balkans and Türkiye show (see Box 3). A robust legislative framework is therefore crucial to ensure transparency, accountability, and the protection of the public interest. Across the Western Balkans and Türkiye, public procurement laws are in place, but significant gaps remain, allowing undue influence, politicised allocation of resources, and inefficiencies that compromise both efforts to ensure fair competition and achieve value for money.

First, there is significant room for bypassing public procurement rules through exceptions in procurement legislation, via interstate agreements, or special laws, creating opportunities for politically connected firms to secure large contracts with little or no competition.

For example, the Law on Strategic Investment adopted in 2017 in **Kosovo** allows the government to declare certain projects as “strategic,” thereby exempting them from standard procurement procedures, which poses serious corruption risks.²¹⁵ In **Serbia**, 45% of the total value of procurements between 2020 and 2024 was exempted from the scope of the Public Procurement Law.²¹⁶ This figure does not even include major projects exempted through special legislation, such as Belgrade EXPO 2027 and Belgrade Waterfront.²¹⁷

Second, none of the countries assessed in this report include provisions addressing incompatibilities arising from past remunerated positions of contracting authority representatives in companies that are active bidders. This omission leaves room for political favouritism through revolving door practices.

Third, although safeguards exist to prevent state contractors from donating to political parties, through partial or full bans, as discussed in the previous section, firms often exploit legal loopholes to bypass these restrictions. For instance, in **Bosnia and Herzegovina**, the ban applies only to contracts with executive authorities, allowing firms to win lucrative contracts with public enterprises and other public institutions.²¹⁸ In **Kosovo**, companies can channel donations through individuals with no direct ties to bidders or provide services or products (e.g. restaurant hall space) “free” of charge.²¹⁹

A notable strength across the region is the gradual improvement in public procurement data availability and quality. **Bosnia and Herzegovina** launched an open data platform in December 2023, while **North Macedonia** provides detailed public procurement data downloadable in .csv formats and publishes regular “red flag” reports. In **Serbia**, the Agency for Prevention of Corruption (APC) maintains a register of public procurement procedures involving companies owned by public officials, enhancing transparency around politically connected firms.²²⁰

All countries’ public procurement legislation contains provisions on ethical discharge of duties by officials involved in public procurement procedures, and, with the exception of **Türkiye**, conflict of interest provisions are included, albeit with varying degrees of detail, contributing to, at least in theory, reducing risks of favouritism.²²¹

Nonetheless, closing existing gaps remains essential to ensure that public procurement is fair, transparent, competitive, and conducted in the public interest.

Box 3. Public procurement in the Western Balkans and Türkiye: Public money, private interests



In **Bosnia and Herzegovina**, a network of companies allegedly linked to Milorad Dodik and his family concluded over 1,800 contracts with public institutions across all government levels over a decade, worth approximately €240 million.²²² In June 2024, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) sanctioned this network of firms,²²³ including “Prointer ITSS” (which had won more than 1,100 contracts since 2015), stating that Dodik had used his official position to accumulate wealth through these companies by securing lucrative government contracts.²²⁴



In **Kosovo**, the Special Prosecution in 2024 indicted Nagip Krasniqi, former CEO of the Kosovo Energy Corporation (KEC), for abuse of office related to the procurement of the A5 boiler “emergency capital repair.”²²⁵ He is suspected of abuse of office, exercise of influence, and conflict of interest in relation to two single sourced contract worth over €3.5 million.²²⁶



In **North Macedonia**, the trial in the “Additive” case began in May 2025, involving alleged manipulation of public procurement procedures and money laundering in contracts for additives for state-owned power plants.²²⁷ Among over 30 accused individuals were high-level energy sector officials, and the accusations involved organising and carrying out re-registration of the activities of legal entities to circumvent public procurement procedures, and enable certain firms to win contracts.²²⁸



In **Serbia**, various investigative journalist stories have revealed that companies tied to individuals close to the ruling Serbian Progressive Party (SNS) have secured substantial public contracts. For example, firms tied with the member of the main board of SNS, Ostoja Mijailović, have for years won lucrative state and city of Belgrade contracts, often without competition.²²⁹



In **Türkiye**, the Council of State annulled the 2022 tender for the Atatürk Airport “Nation’s Garden” project, which had been conducted under the exceptional 21/b procedure. The case involved allegations that the procurement was structured as a closed, invitation-based process without meeting the legal requirements of urgency or technical necessity. The tender, organised by the Housing Development Administration (TOKİ) and challenged by the Istanbul Metropolitan Municipality, included several major construction firms, with a reported contract value exceeding TRY 2.1 billion. In its final ruling in February 2024, the Council of State found that referencing the Presidency’s “First 100 Days Action Plan” was insufficient to justify the use of the 21/b procedure, and also highlighted the lack of technical justification for limiting participation, pointing to risks of pre-selected bidders and undue political influence in the procurement process.²³⁰

Key challenges and strengths in the Western Balkans and Türkiye

In **Bosnia and Herzegovina**, the Public Procurement Law²³¹ introduces several safeguards aimed at preventing conflicts of interest and corruption in procurement procedures. A conflict of interest includes situations when contracting authority representatives²³² have a direct or indirect financial, economic, or personal interest that could compromise their impartiality or independence. This includes, for instance, cases where a representative holds a managerial position or more than 0.5% of shares in a bidding company.²³³ Contracting authority representatives are required to declare any conflicts of interest—including those involving family members—regularly update these declarations, and withdraw from the process once a conflict is identified.²³⁴ However, past remunerated positions in bidding entities do not disqualify officials, leaving a gap in the system.²³⁵ Bidders are also obliged to submit declarations affirming that they have not offered bribes or engaged in corrupt practices.²³⁶ As discussed in the previous section, while there are restrictions preventing companies that win public contracts from donating to political entities, these bans are limited. They apply only to contracts with executive authorities, excluding judicial and legislative bodies, as well as public enterprises and public service institutions—allowing companies to secure large contracts with entities not covered by the law.²³⁷

Regarding transparency, Bosnia and Herzegovina launched an open data portal for public procurement in December 2023,²³⁸ providing access to procurement data in machine-readable formats.²³⁹ Although contracting authorities are required to disclose conflicts of interest on their websites, this is rarely done in practice.²⁴⁰ Transparency remains limited, as suppliers and bidders are not obliged to disclose their political contributions, and such information can only be obtained indirectly through political parties' financial and campaign reports.²⁴¹ Members of procurement commissions must sign declarations of impartiality and absence of conflict of interest before assuming their duties.²⁴² However, government suppliers are not required to publicly declare their corporate political activities or lobbying efforts.²⁴³

Oversight is carried out by the Public Procurement Agency and the Procurement Review Body, but both suffer from limited resources, hindering effective

monitoring and timely response to complaints.²⁴⁴ Moreover, the lack of clear regulations for the post-award phase leaves additional gaps in oversight.²⁴⁵

The latest EC Rule of Law report notes similar challenges, highlighting that the Public Procurement Agency lacks sufficient staff to effectively implement and monitor public procurement policy and that stronger coordination is needed with the Competition Council, audit and judiciary institutions.²⁴⁶

In **Kosovo**, the Law on Public Procurement²⁴⁷ requires officials involved in procurement procedures to declare any conflict of interest, including situations in which they or their close family members have financial interests in bidding companies—such as owning shares, holding controlling positions, or maintaining other substantial financial stakes in entities applying for licenses or participating in public tenders. Public officials are also bound by a Code of Ethics for Public Procurement.²⁴⁸ However, there are no provisions addressing conflicts arising from prior remunerated positions, leaving room for potential undue influence.

There are notable risks of bypassing procurement procedures. Although safeguards exist—such as the requirement to provide a written justification for non-competitive procedures—final discretion lies with the contracting authority.²⁴⁹ The negotiated procedure without prior publication, for instance, is allowed only under specific circumstances, yet these may be abused, for example by exaggerating the urgency of a procurement need.²⁵⁰

Regarding transparency, Kosovo operates an e-procurement platform, but it faces challenges. Data on awarded contracts are often published with delays, while post-award information is often incomplete and inconsistently updated, limiting effective public scrutiny.²⁵¹ Bidders are not obliged to publicly disclose information about their corporate political activities, and firms can circumvent political finance restrictions by finding alternative ways to channel donations²⁵² (see Box 2). There are also issues with bypassing procurement rules by designating projects as secret or strategic investments, which exempts them from competitive procedures and enables politically connected firms to secure contracts without open competition.²⁵³ For instance, in the first three months of 2024, 108 contracts worth over €30 million were awarded through

negotiated procedures without publication of calls.²⁵⁴

Oversight mechanisms exist, primarily through internal audits and the Public Procurement Regulatory Commission, but this body faces resource constraints and a lack of skilled personnel.²⁵⁵ Reports by the Kosovo Democratic Institute (KDI) have highlighted that the post-award phase remains particularly vulnerable to unethical practices due to weak regulation and insufficient oversight.²⁵⁶

The latest EC Rule of Law report echoes these findings, noting that the Public Procurement Regulatory Commission has insufficient technical and human capacities and that negotiated procedure continues to be overused, although it acknowledges some progress in inter-agency cooperation.²⁵⁷

In **North Macedonia**, the Law on Prevention of Corruption and Conflicts of Interest includes provisions requiring officials to recuse themselves from decision-making when a conflict of interest arises, while the Law on Public Procurement mandates that contracting authority officials sign a no conflict of interest statement, and withdraw from the process if such a conflict is identified.²⁵⁸ Officials are also required to transfer the management of their companies to another person while in office and must disclose any legal entities in which they own shares or hold managerial roles.²⁵⁹

The Law on Prevention of Corruption and Conflicts of Interest also introduces revolving door restrictions relevant to public procurement. Officials are prohibited from being employed in or acquiring shares in a company with which they had supervisory or contractual relations during their tenure for a period of three years after leaving office.²⁶⁰ However, the law does not explicitly cover prior remunerated positions with active suppliers. The Law on Public Procurement further stipulates that an individual from a contracting authority who participated in a procurement process in which more than 5% of total annual contracts were awarded to a particular entity may not, within two years of leaving

public employment, work for or receive compensation from that entity or its affiliates, nor acquire shares in it.²⁶¹

Regarding transparency, public procurements are published on an e-procurement platform that includes procurement plans for each institution and allows data downloads in machine-readable (.csv) formats.²⁶² The platform also features data visualisations of contracts and regular “red flag” reports prepared by the Public Procurement Bureau, which analyse contracts for corruption risks and are submitted to the State Audit Office and the State Commission for the Prevention of Corruption (SCPC).²⁶³ However, government suppliers are not required to publicly disclose information about their corporate political activities. Companies must submit financial statements disclosing all income and expenditures, including donations.²⁶⁴

The latest EC Rule of Law report notes that corruption risks remain high in public procurement, citing concerns about transparency in tendering and state contracts. The report also highlights that the SCPC criticised proposed amendments to the Public Procurement Law that would abolish administrative control by the Public Procurement Bureau, as they could weaken anti-corruption protections.²⁶⁵

Box 4. Licensing in North Macedonia: Integrity and transparency gaps



The Law on Mineral Goods and the Law on Concessions and Public Private Partnerships do not include specific provisions related to the ethical discharge of duties, but conflict-of-interest rules are covered under the Law on Prevention of Corruption and Conflicts of Interest. While the Law on Mineral Resources lacks such provisions entirely, the Law on Concessions and Public-Private Partnerships stipulates the formation of a Commission for Conducting Concession Procedures, whose members must not be married to or closely related to the tenderer, must not have been employed by or served on the management or supervisory bodies of the bidder in the past three years, and must not have any other legal relationship with the bidder.²⁶⁵ Additionally, individuals convicted of financial crime, fraud, or corruption are prohibited from serving on the commission.



There are no legal requirements for licensing applicants to publicly disclose information about their corporate political activity. However, like other companies, they are required to submit annual financial statements detailing income and expenditures, meaning that donations would appear in these reports.²⁶⁷



Regarding transparency, only a single Excel file is publicly available, listing concluded concession contracts for the exploration of mineral resources.²⁶⁸ Although an e-concessions system has been established—allowing legal entities to access tender documentation and submit applications—the process of awarding concessions remains opaque, with no detailed information, contracts, or supporting documents publicly accessible.²⁶⁹

In **Serbia**, the Law on Public Procurement includes conflict-of-interest provisions requiring representatives of contracting authorities²⁷⁰ to recuse themselves from procurement procedures if a conflict of interest arises. This obligation also applies when a relative of the officials manages the bidding firm or owns more than 1% of shares or stocks.²⁷¹ However, there are no restrictions concerning officials who previously held remunerated positions in bidding firms.²⁷² Companies are also not required to publicly disclose information about their corporate political activities and aside from the limits established in political finance regulations, no additional restrictions apply to government suppliers making political donations.

Regarding transparency, data are published on the central public procurement portal,²⁷³ in a timely manner and are available in machine-readable formats. However, downloadable datasets lack key details, such as the number of bids and unique identification numbers of contracting authorities and bidders, which are essential to develop corruption risk indicators. More comprehensive data can be accessed only by manually downloading individual PDF files. Bidders and suppliers have no legal obligation to disclose political contributions, nor must public officials involved in procurement report meetings or exchanges with bidders.²⁷⁴ Upon the opening of tender documents, contracting authority representatives are required to sign a no conflict-of-interest statement.²⁷⁵

Serbia's procurement framework contains numerous exemptions that allow circumvention of the law, creating opportunities for politically connected firms to secure contracts, undermining political integrity and increasing corruption risks. These include exceptions based on special laws and interstate agreements.²⁷⁶ For instance, the Special law for EXPO 2027²⁷⁷ exempts all procurements conducted by designated EXPO entities from the Public Procurement Law.²⁷⁸ This exemption eliminates standard grievance mechanisms, preventing bidders from contesting irregular criteria or alleging tender fixing.²⁷⁹ Furthermore, the government's Regulation on EXPO 2027 Procurement introduces provisions that heighten corruption risks—such as higher thresholds for announcing tenders, no minimum deadlines for submissions, and no complaint mechanism for bidders.²⁸⁰

The October 2025 European Parliament resolution, highlighted that Serbia had already been warned in the European Commission reports about circumventing public procurement rules using interstate agreements, and that in March 2025, the European Public Prosecutor's Office (EPPO) initiated an investigation into potential misuses of EU funds allocated for the reconstruction of the railway station in Novi Sad.²⁸¹

In **Türkiye**, public procurement procedures are regulated by the Law No. 4734 on Public Procurement, which contains some safeguards against undue influence. There are clear restrictions to prevent conflicts of interest and ensure impartiality in public contracting. The law prohibits officials involved in procurement procedures—including contracting officers, members of tender boards, and anyone responsible for preparing, executing, finalising, or approving procurement processes—from participating in tenders directly or indirectly. These restrictions also extend to their close relatives. Furthermore, companies and partners connected to these individuals are likewise barred from participating in procurements conducted by the relevant contracting authority. The only exception applies to joint-stock companies where these individuals do not sit on the board of directors or own more than 10% of the company's shares.²⁸² Additionally, there are no restrictions placed on officials based on past remunerated positions they had with suppliers or bidders.²⁸³ This means that former employees or executives of companies participating in public tenders may take part in procurement decision-making processes shortly after leaving such positions, creating a potential conflict of interest and risk of undue influence.

Regarding transparency, companies are not required to publicly disclose their corporate political activity or interactions with public officials with responsibilities in public contracting and licensing.²⁸⁴ Also, bidders are not legally obliged to disclose their political donations neither on their websites nor to the contracting authority.²⁸⁵ Likewise, public officials are also not required to disclose their interactions with suppliers or bidders. A further challenge is the absence of open procurement data. While tender notices and award results are published, the information is not available in open data formats, limiting analysis and hindering external oversight.²⁸⁶

Over time, Türkiye has introduced numerous exemptions and amendments to the Public Procurement Law, which have gradually weakened its effectiveness. The use of negotiated tenders under Article 21(b)—originally intended for emergencies—has become widespread well beyond such situations, effectively opening the door to favouritism.²⁸⁷

The latest EC Rule of Law report highlights the increasing number of exclusions which narrow the scope of public procurement rules.²⁸⁸ It particularly notes excessive use of negotiated procedure, corresponding to 30% of all tenders in terms of value.²⁸⁹ This practice raises allegations of political influence over public contracting.

Recommended collaborative initiatives

Given that political ties often extend regionally, coordinated action is essential to strengthen procurement integrity. One promising initiative would be the creation of a Regional Public Procurement Integrity Network, ideally facilitated by civil society, bringing together procurement agencies and anti-corruption bodies from Western Balkan states and Türkiye. This network could engage in the exchange of information on bidders, collusion detection, and conflict-of-interest cases, while maintaining a shared database of blacklisted firms and individuals, which could be useful to each oversight body for the development of red flags and corruption risk indicators. This approach aligns with UNCAC Resolution 10/9, which encourages cooperation among relevant authorities in public procurement processes and the establishment of corruption risk management mechanisms.²⁹⁰

In parallel, joint civil society monitoring of cross-border infrastructure projects could be promoted. For example, NGOs from neighbouring countries could collaborate to track both sides of a jointly financed highway or

energy project, comparing contract terms, costs, and implementation progress. Such cooperation would enhance public scrutiny of high-risk projects and help identify patterns of political favouritism or cost inflation that transcend national boundaries.

Additionally, considering corruption risks stemming from the influence of politically connected firms discussed in previous sections, there is a need to establish public-private dialogues on procurement reform, ideally facilitated by civil society organisations. These forums could bring together business representatives, regulators, and watchdog groups to discuss barriers to fair competition and procurement reforms, as well as to explore incentives for ethical business conduct. This aligns with the spirit of UNCAC Resolution 10/12, which encourages engagement with the private sector to foster a culture of compliance, integrity, and transparency.²⁹¹ When embedded in a regional framework, such dialogues could also contribute to more consistent standards and expectations across borders.

States Parties shall take the necessary steps to establish appropriate systems of procurement... based on transparency, competition and objective criteria in decision-making.



UNCAC

United Nations Convention
against Corruption (UNCAC)

RECOMMENDATIONS

Asset and interest declarations

- **Scope of declarants:** Amend relevant laws to expand the scope of coverage, requiring public officials to submit declarations for their business associates and children living outside of the family household.
- **Reporting obligations:** Amend relevant laws to expand reporting obligations to include requirements for declaring prior remunerated positions and gifts received prior to assuming office.
- **Data quality:** Make information on assets and interests of public officials available in open data formats which are suitable for bulk downloads, in formats such as .csv and .json, and preferably through APIs, and utilise unique identifiers to enhance dataset interoperability.
- **Verification:** Empower independent oversight bodies with adequate financial and human resources, clear mandates, and access to relevant databases to facilitate effective verification, through, for example, legally establishing a minimum number of audits.
- **Enforcement:** Invest oversight institutions with powers and resources to investigate asset and interest declaration breaches and to impose proportionate, dissuasive, and consistently enforced sanctions for non-compliance, including for failure to submit declarations, late submissions, and incorrect data, to ensure accountability and deter concealment of assets or conflicts of interest.

Political finance²⁹²

- **Extent of coverage for third party campaigning:** Establish equal limitations and reporting obligations for third parties participating in campaigns as for political parties and candidates.²⁹³
- **Extent of coverage for candidate self-financing:** Establish equal limitations and reporting obligations for donations and expenditures by candidates to their own campaigns as those applied to political parties.²⁹⁴

- **Data transparency standards:** Publish financial and campaign reports of political parties, candidates, and third parties on a centralised platform in line with open data standards, which allow for bulk downloads and ensure their interoperability with other relevant databases such as beneficial ownership registers, company registers, asset and interest declaration registers, lobbying registers, and others.
- **Oversight and verification:** Endow relevant oversight agencies with sufficient human, financial, and technological resources to conduct effective and timely controls of both regular and campaign finance of political contestants.
- **Inter-agency cooperation:** Establish channels for inter-agency cooperation between political finance oversight agencies and other relevant bodies, such as the tax authority, audit institutions, and the judiciary, to facilitate prompt exchange of information in the course of audits and investigations to prevent delays.

Public contracting

- **Public procurement laws:** End the widespread practice of circumventing public procurement rules through exceptions such as interstate agreements, strategic investment projects, or special laws to limit risks of politically connected actors winning lucrative contracts without competition and transparency.
- **Revolving door:** Introduce explicit “cooling-off” and incompatibility provisions in the public procurement and conflict-of-interest legislation to prevent undue influence stemming from revolving door practices. Officials who previously held remunerated or managerial positions in companies that are active bidders should be prohibited from participating in procurement procedures involving those firms for a defined period (e.g., two to three years) after leaving their private-sector post. Likewise, former public officials involved in procurement should be barred from accepting employment, consultancy, or ownership roles in companies that won contracts under their supervision during the same period.
- **Limits on state contract winners’ political donations:** Strengthen restrictions on political donations from state contractors to close existing legal loopholes that allow firms to circumvent bans, by, for example, extending donation bans to all types of public contracts.
- **Data availability:** Ensure that all relevant data, documentation, and information are publicly accessible through centralised e-procurement platforms, and that key details on public procurement contracts, such as the number of bidders, final price, announcement and submission dates, unique identification numbers of contracting authorities and winning firms, and decision timelines, are available for bulk download in line with open data standards. This should also include the creation of dedicated e-systems for awarded concessions, such as those related to the exploration of mineral resources and small hydropower plants.
- **Transparency of awarded concessions:** Publish beneficial ownership information of companies receiving concessions to help prevent conflicts of interest and detect links to public officials or their close associates.

ENDNOTES

- 1 Isabelle Büchner, [Between anti-corruption reform and decline: Examining key actors, strengths and weaknesses in the Western Balkans and Türkiye’s national integrity systems](#), Transparency International, 2024; Miloš Resimić, [Accountability loading: A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024; Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023.
- 2 Consulting Group, NUIS, 2024. [Balkan Barometer 2024](#). Regional Cooperation Council (RCC), p. 15.
- 3 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International; Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo’s political integrity regulations](#), Kosova Democratic Institute (KDI), 2025; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025.
- 4 Ibid.
- 5 Regional Anti-Corruption Initiative (RAI), 2021. [Regional Data Exchange on Asset Disclosure and Conflict of Interest](#).
- 6 Nieves Zúñiga, [Examining State Capture: Undue Influence on Law-Making and the Judiciary in the Western Balkans and Türkiye](#), Transparency International, 2020; Slagjana Taseva, [Grand Corruption and Tailor-Made Laws in Republic of North Macedonia](#). Transparency International Macedonia, 2020.
- 7 Transparency International, [Corruption Perceptions Index](#).
- 8 See Boxes 1, 2, and 3.
- 9 Miloš Resimić, [Accountability loading: A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024.
- 10 Transparency International, 2015. [Asset declarations in MENA countries. Illicit enrichment and conflicts of interest of public officials](#); Aly Marczynski and José María Marín, [Compendium of good practices on anti-corruption for OGP action plans](#), Transparency International, 2018; Stolen Asset Recovery Initiative, 2012, [Public office, private interests. Accountability through income and asset disclosure](#). The World Bank; Organisation for Economic Cooperation and Development, 2003. [Recommendation of the Council on Guidelines for Managing Conflict of Interest in the Public Service](#); Raphaël Kergueno and Jon Vrushi, [Debugging democracy: Open data for political integrity in Europe](#), Transparency International, 2020.
- 11 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International; Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo’s political integrity regulations](#), Kosova Democratic Institute (KDI), 2025; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025.
- 12 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 14.
- 13 [Law no. 08/I-108 on declaration, origin and control of assets and gifts](#) (Official Gazette of the Repub-

lic of Kosovo No. 21), Article 14.

14 In the law, family members “mean a spouse, an extra – marital partner, children, parents, brothers and sisters and other relatives” with who the declarant live in the same household. See: [Law on prevention of corruption and conflict of interests](#), Official Gazette of RM number 19/2019, Article 8.

15 For the whole list, see: [Law no. 08/I-108 on declaration, origin and control of assets and gifts](#) (Official Gazette of the Republic of Kosovo No. 21), Article 6.

16 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International; Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo’s political integrity regulations](#), Kosova Democratic Institute (KDI), 2025; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025.

17 Ibid.

18 Ibid.

19 Ibid.

20 Milena Mitrović, [Neprijavljene nekretnine Nenada Nešića u Srbiji](#) [Unreported real estate of Nenad Nesic in Serbia], CIN, 2 February 2023.

21 Reporteri, October 2022. [Indictment against Minister Rozeta Hajdari for failure to declare assets, could result in up to 3 years in prison](#).

22 Telegraf, December 2022. [Minister Rozeta Hajdari is fined 700 euros for not declaring assets](#).

23 Sabina Fakic, German Filkov i Pavle Gacov, [Дупки и недоследности во пријавувањето сопственост и интереси на функционерите на патот на откривањето корупција](#) [Gaps and inconsistencies in declaring assets and interests of officials on the path to uncovering corruption], Centre for Civil Communications, 2025.

24 Jelena Veljković and Aleksandar Đorđević, [Belgrade Mayor Failed to Declare Villa Bought in Trieste](#), Balkan Insight, 26 January 2023.

25 Tolga Şardan, [98 milyonluk mal varlığını açıklamayan Vali Bilgin’e yargı yolu!](#) [Legal action against Governor Bilgin, who failed to disclose his 98 million worth of assets!], T24, 13 December 2024.

26 Ibid.

27 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International, p. 17.

28 Unless they have a legal relationship or are listed as family members. Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International, p. 17.

29 BiH, Federation of BiH, Republika Srpska, Brčko District.

30 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International, p. 18; [Electoral law of Bosnia and Herzegovina](#) („Official Gazette of Bosnia and Herzegovina“, no. 23/01, 7/02, 9/02, 20/02, 25/02, 4/04, 20/04, 25/05, 52/05, 65/05, 77/05, 11/06, 23/06, 23, 07, 2008 32/10, 18/13, 7/14, 31/16, 41/20, 38/22, 51/22, 67/22, 24/24), Article 15.7.

31 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bos-](#)

nia and Herzegovina. Transparency International, p. 18.

32 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International; Miloš Resimić, [Accountability loading: A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024, p. 10.

33 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#), p. 21.

34 Ibid, p. 22.

35 Ibid.

36 Ibid, pages 16, 18, 23.

37 Ibid, p. 23.

38 Ibid, p. 24

39 European Commission (EC), October 2024. [Bosnia and Herzegovina 2024 Report](#), p. 6.

40 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#), p. 24.

41 European Commission (EC), October 2024. [Bosnia and Herzegovina 2024 Report](#), p. 34.

42 Which include, among others, Advisers to the President of the Republic of Kosovo, Advisers to the President of the Assembly of the Republic of Kosovo, Advisers to the Prime Minister of the Republic of Kosovo and Advisers to the Ministers of the Government of Kosovo, including external political advisers; For the full list, see: [Law no. 08/I-108 on declaration, origin and control of assets and gifts](#) (Official Gazette of the Republic of Kosovo No. 21), Article 4.

43 Which include, among others, Public Procurement officials in all public institutions of local and central level and in public enterprises of local and central level. For the full list, see: [Law no. 08/I-108 on declaration, origin and control of assets and gifts](#) (Official Gazette of the Republic of Kosovo No. 21), Article 5.

44 [Law no. 08/I-108 on declaration, origin and control of assets and gifts](#) (Official Gazette of the Republic of Kosovo No. 21), Article 14.

45 Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo’s political integrity regulations](#), Kosova Democratic Institute (KDI), 2025, p. 23,

46 For the whole list, see: [Law no. 08/I-108 on declaration, origin and control of assets and gifts](#) (Official Gazette of the Republic of Kosovo No. 21), Article 6.

47 Ibid, Article 6.

48 Ibid, Article 12.

49 Ibid, Article 7.

50 Ibid, Article 12.

51 The Agency for Prevention of Corruption (APK). [Register](#); Miloš Resimić, [Accountability loading: A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024, p. 10; Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo’s political integrity regulations](#), Kosova Democratic Institute (KDI), 2025, p. 28.

52 Ibid, p. 31.

- 53 [Law no. 08/I-108 on declaration, origin and control of assets and gifts](#) (Official Gazette of the Republic of Kosovo No. 21), Article 11.
- 54 Ibid, Article 18.
- 55 Ibid.
- 56 Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025, p. 32.
- 57 Ibid, p. 31.
- 58 European Commission (EC), October 2024. [Kosovo* 2024 Report](#), p. 6.
- 59 See: [The Law on Prevention of Corruption and Conflicts of Interest](#).
- 60 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 15.
- 61 For the full list, see: [Law on prevention of corruption and conflict of interests](#), Official Gazette of RM number 19/2019, Article 82.
- 62 [Law on prevention of corruption and conflict of interests](#), Official Gazette of RM number 19/2019, Article 83.
- 63 Ibid, Article 84; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 16.
- 64 In the law, family members “mean a spouse, an extra – marital partner, children, parents, brothers and sisters and other relatives” with who the declarant live in the same household. See: [Law on prevention of corruption and conflict of interests](#), Official Gazette of RM number 19/2019, Article 8.
- 65 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 16.
- 66 [Law on prevention of corruption and conflict of interests](#), Official Gazette of RM number 19/2019, Article 82; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, pp. 16-17.
- 67 [Law on prevention of corruption and conflict of interests](#), Official Gazette of RM number 19/2019, Articles 82, 85.
- 68 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 17.
- 69 The State Commission for the Prevention of Corruption, [Data on assets and interests](#); Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 18.
- 70 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 18.
- 71 Ibid.
- 72 Ibid, p. 19.
- 73 Ibid, p. 20.
- 74 Ibid, p. 20.
- 75 European Commission (EC), July 2025. [2025 Rule of Law Report. Country Chapter on the rule of law](#)

- [situation in North Macedonia](#), p. 11.
- 76 [The Law on Prevention of Corruption](#) (Official Gazette no. 35/2019, 88/2019, 11/2021 – authentic interpretations 94/2021 and 14/2022), Parts III, IV, (conflicts of interest) and VII (assets and income disclosure).
- 77 Ibid, Article 68.
- 78 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 14.
- 79 Ibid, p. 14.
- 80 Ibid, p. 14.
- 81 For the full list, see: [The Law on Prevention of Corruption](#) (Official Gazette no. 35/2019, 88/2019, 11/2021 – authentic interpretations 94/2021 and 14/2022), Article 71.
- 82 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 13.
- 83 [The Law on Prevention of Corruption](#) (Official Gazette no. 35/2019, 88/2019, 11/2021 – authentic interpretations 94/2021 and 14/2022), Article 73.
- 84 Significant changes refer to the changes of assets or property above average annual net salary or in case of changes in the structure of assets. See: [The Law on Prevention of Corruption](#) (Official Gazette no. 35/2019, 88/2019, 11/2021 – authentic interpretations 94/2021 and 14/2022), Articles 68, 69.
- 85 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 13; [The Law on Prevention of Corruption](#) (Official Gazette no. 35/2019, 88/2019, 11/2021 – authentic interpretations 94/2021 and 14/2022), Articles 68, 69.
- 86 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 14.
- 87 The Agency for the Prevention of Corruption (ACAS), [The search of asset and income declarations](#); There is a also a likelihood that some data is missing from the register, as acknowledge by a caveat in the online register stating that: “The Anti-Corruption Agency (ACAS) notes that the absence of a declaration in the database does not necessarily mean it was not submitted.”
- 88 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 15.
- 89 [The Law on Prevention of Corruption](#) (Official Gazette no. 35/2019, 88/2019, 11/2021 – authentic interpretations 94/2021 and 14/2022), Article 75; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 13.
- 90 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 16.
- 91 Only about 5% of declarations are substantially verified within a four-year term. Source: Ibid, p.16.
- 92 Ibid, p. 16.
- 93 Ibid, p. 17.
- 94 [Law No. 3628 on Declaration of Property and Combatting Bribery and Corruption](#).
- 95 For the full list, see: [Law No. 3628 on Declaration of Property and Combatting Bribery and Corruption](#), Article 2.

96 Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, p. 15.

97 Ibid, p. 15.

98 For the full list see: [Law No. 3628 on Declaration of Property and Fight Against Bribery and Corruption](#), Article 5

99 Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, p. 16.

100 Specific deadlines depend on the category of public officials: e.g. for appointments, it needs to be provided along with the documents required for entry into office, while for elected positions, declarations need to be submitted within two months following the finalisation of elections. See: [Law No. 3628 on Declaration of Property and Fight Against Bribery and Corruption](#), Article 6.

101 [Law No. 3628 on Declaration of Property and Fight Against Bribery and Corruption](#), Article 6.

102 Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, p. 19.

103 Ibid, p. 20.

104 Ibid, p. 20.

105 Ibid, p. 21.

106 [Law No. 3628 on Declaration of Property and Fight Against Bribery and Corruption](#), Article 8.

107 Ibid, Article 9.

108 Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, p. 21.

109 [Law No. 3628 on Declaration of Property and Fight Against Bribery and Corruption](#), Articles 10, 11; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, p. 22.

110 Sources: [Law on prevention of corruption and conflict of interests](#), Official Gazette of RM number 19/2019, Article 82; Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025, p. 25; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 15; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, p. 17.

111 While Article 15.9 of the Electoral Law stipulates that the Central Election Commission (CEC) provides public access to asset declarations, it does not specify how long this information should remain publicly available. Source: Information obtained from the CEC upon request.

112 Regional Anti-Corruption Initiative (RAI), 2021. [Regional Data Exchange on Asset Disclosure and Conflict of Interest](#).

113 Transparency International, 2024. [Standards for integrity in political finance: A global policy position](#), p. 3.

114 Miloš Resimić, [Accountability loading: A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024, p. 11; Transparency International. 2009. [The anti-corruption plain language guide](#).

115 Miloš Resimić, [Accountability loading: A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024, p. 11.

116 Ibid; Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023; Uglješa Ugi Zvekić, Sunčana Roksandić and Bojan Dobovšek, Organised corruption: Political financing in the Western Balkans, Global Initiative Against Transnational Organised Crime, 2023.

117 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International; Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025.

118 Conference of the States Parties to the United Nations Convention Against Corruption, 11/7, [Preventing and combating corruption through enhancing transparency in the funding of political parties, candidatures for elected public office, and electoral campaigns](#), 2025, p. 31.

119 Ibid.

120 See: Conference of the States Parties to the United Nations Convention Against Corruption, 11/7, [Preventing and combating corruption through enhancing transparency in the funding of political parties, candidatures for elected public office, and electoral campaigns](#), 2025, p. 31.

121 Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025.

122 See: Conference of the States Parties to the United Nations Convention Against Corruption, 11/7, [Preventing and combating corruption through enhancing transparency in the funding of political parties, candidatures for elected public office, and electoral campaigns](#), 2025, p. 31.

123 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International; Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025.

124 See: Conference of the States Parties to the United Nations Convention Against Corruption, 11/7, [Preventing and combating corruption through enhancing transparency in the funding of political parties, candidatures for elected public office, and electoral campaigns](#), 2025, p. 30.

125 Ibid.

126 Ibid.

127 Ibid.

128 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025.

129 Transparency International Bosnia and Herzegovina, May 2023. Kako stranke finansiraju kampanju: 19,4 miliona iz budžeta, velike donacije javnih funkcionera i privatnih firmi koje posluju sa državom [How are parties financing campaigns: 19.4 million from the budget, large donations of public officeholders and private firms who do business with the state]. <https://transparentno.ba/2023/05/22/kako-stranke-finansiraju-kampanju-194-miliona-iz-budzeta-velike-donacije-javnih-funkcionera-i-privatnih-firmi-koje-posluju-sa-drzavom/>.

130 Nadije Ahmeti, [Beteja milionëshe për vota](#) [The battle for millions of votes], Radio Free Europe, 29 January 2025.

131 Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025, p. 60.

- 132 State Commission for the Prevention of Corruption (DKSK), October 2025. [Извештаи за примени донации доставија 35% од вкупниот број на учесници во изборната кампања](#) [Reports on donations submitted by 35% of the overall number of participants in the electoral campaign].
- 133 Ivana Milosavljević, Teodora Ćurčić, and Vladimir Kostić, [CINS Inside SNS's Call Center: Hostess Agency, Vote Buying, and Millions in Cash](#), CINS, 29 November 2023.
- 134 Ivana Milosavljević, [SNS Did Not Include Call Center in Its Anti-Corruption Agency Report](#), CINS, 13 December 2023.
- 135 Ivana Milosavljević, [Nenadić: Agencija nije uradila sve da ispita slučaj SNS kol centra](#) [Nenadic: The Agency did not do everything to look into the case of the SNS call centre], CINS, 11 January 2024.
- 136 Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 14; Transparency International Türkiye, 2025. [Assessing political integrity rules in Türkiye](#), p. 32.
- 137 [Election Law of Bosnia and Herzegovina](#) (Official Gazette of BiH 23/01, 7/02, 9/02, 20/02, 25/02, 4/04, 20/04, 25/05, 52/05, 65/05, 77/05, 11/06, 24/06, 32/07, 33/08, 37/08, 32/10, 18/13, 7/14, 31/16, 41/20, 38/22, 51/22, 67/22, 24/24); [Law on Political Party Financing](#) (Official Gazette of BiH 95/12, 41/16); [Rulebook on annual financial reports of political parties](#) ("Official Gazette of BiH", 96/13, 89/16, 5/22, 2024); [Rulebook on pre-election and post-election financial reports and reports on the circulation of a special account for financing the election campaign of political parties](#) ("Official Gazette of BiH", 2024).
- 138 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International, p. 29.
- 139 Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 4.
- 140 [Law on Political Party Financing](#) (Official Gazette of BiH 95/12, 41/16), Article 8.
- 141 Additionally, there is an exception for "educational programs aimed at development and promotion of democratic principles". See: [Law on Political Party Financing](#) (Official Gazette of BiH 95/12, 41/16), Article 8; Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 8.
- 142 The amount from public procurement contracts in a calendar year cannot exceed 10,000 KM (approx. €5,100). See: [Law on Political Party Financing](#) (Official Gazette of BiH 95/12, 41/16), Article 8.
- 143 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International, p. 33.
- 144 Ibid, p. 30; Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 4.
- 145 Ibid.
- 146 By March 31st of the following year. See: Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International, p. 29.
- 147 Including the three months period before submitting candidacy. See: Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International, p. 29.
- 148 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International, p. 29.
- 149 Ibid, p. 32.

- 150 Ibid, p. 32.
- 151 Ibid, p. 33.
- 152 Ibid, p. 34.
- 153 Ibid, p. 34.
- 154 Ibid, p. 35.
- 155 European Commission (EC), July 2024. [Bosnia and Herzegovina 2024 Report](#), p. 4.
- 156 [Law No. 08/L-228 on General Elections](#) (Official Gazette 14/2023);
- 157 Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025, p. 40; Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 9
- 158 Ibid, p. 38.
- 159 Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 8.
- 160 Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025; Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 11.
- 161 Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025, p. 42.
- 162 Ibid.
- 163 Ibid, p. 45.
- 164 Miloš Resimić, [Accountability loading: A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024, p. 10.
- 165 Ibid, p. 47.
- 166 Ibid.
- 167 Ibid.
- 168 Ibid.
- 169 Ibid, p. 50.
- 170 [Law on Financing of Political Parties; Electoral Code](#).
- 171 Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 9.
- 172 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 21.
- 173 Ibid, p. 8.
- 174 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 23.

- 175 Ibid, p. 22.
- 176 Ibid, p. 23.
- 177 Ibid, p. 24
- 178 Miloš Resimić, [Accountability loading: A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024, p. 12.
- 179 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 25.
- 180 Ibid, p. 25.
- 181 Ibid, p. 25.
- 182 Ibid, p. 25.
- 183 European Commission (EC), July 2025. [2025 Rule of Law Report: Country Chapter on the rule of law situation in North Macedonia](#), p. 1.
- 184 The Law on Prevention of Corruption (Official Gazette no. 35/2019, 88/2019, 11/2021 – authentic interpretations 94/2021 and 14/2022); The Law on Financing of Political Activities (Official Gazette no. 14/2022).
- 185 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 18.
- 186 Ibid.
- 187 Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 9.
- 188 These include a preliminary report five days before the election day, and a final report within 30 days from the date of publication of an aggregate report on the election results. See: Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 19.
- 189 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 19.
- 190 See: Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 14.
- 191 Ibid.
- 192 Ibid, p. 20.
- 193 Ibid.
- 194 Ibid, p. 21.
- 195 Ibid.
- 196 Ibid.
- 197 Ibid.
- 198 European Commission (EC), July 2025. [2025 Rule of Law Report: Country Chapter on the rule of law situation in Serbia](#), p. 9.
- 199 Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, pp. 25-26.

- 200 Ibid, p. 27; Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 12.
- 201 Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 9.
- 202 Capped at 2 billion Turkish Liras in a year (approx. €41 million), same as for legal entities. See: [Turkish Political Parties Law](#) (Law No. 2820), Article 66.
- 203 Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, p. 28.
- 204 Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 12; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, p. 28.
- 205 Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025, p. 28.
- 206 Ibid, p. 30.
- 207 Ibid, p. 29.
- 208 Jon Vrushi and Isabelle Büchner, [Bringing the receipts: Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 14.
- 209 Transparency International Türkiye, 2025. [Assessing political integrity rules in Türkiye](#), p. 32.
- 210 Transparency International Türkiye, 2025. [Assessing political integrity rules in Türkiye](#), p. 33.
- 211 Ibid, p. 33.
- 212 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International; Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025.
- 213 Mihály Fazekas and István János Tóth, [From Corruption to State Capture: A New Analytical Framework with Empirical Applications from Hungary](#), Political Research Quarterly, Vol. 69, No. 2, June 2016; Miloš Resimić, [Public-private relationships in defence procurement in the EU: The case of the UK](#), Government Transparency Institute, 2019.
- 214 Miloš Resimić, [Accountability loading: A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024.
- 215 Ibid, p. 57.
- 216 prEUgovor, 22 May 2025. [Kad izuzetak postane pravilo: Javne nabavke u Srbiji 2020-2024](#) [When the exception becomes a rule: Public procurement in Serbia 2020-2024].
- 217 Ibid.
- 218 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#), p. 37.
- 219 Nadije Ahmeti, [Beteja milionëshe për vota](#) [The battle for millions of votes], Radio Free Europe, 29 January 2025.
- 220 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in](#)

[Bosnia and Herzegovina](#); Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia.

221 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#). Transparency International; Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025; Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025; Transparency International Türkiye, [Assessing political integrity rules in Türkiye](#), 2025.

222 Goran Katić and Predrag Zvijerac, [Muk institucija u BiH o daljoj saradnji sa firmama na američkoj 'crnoj listi' povezanim sa Dodikom](#) [Silence of the BiH institutions regarding further cooperation with firms on the American 'black list'], Radio Free Europe, 19 June 2024.

223 OFAC lifted the sanctions against Milorad Dodik, his family members, and the network of firms in October 2025. See: OFAC, October 2025. [Balkans-related Designation Removals; Issuance of New Russia-related General License and Amended Russia-related Frequently Asked Question](#).

224 The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), 18 June, 2024. [Treasury Targets Milorad Dodik's Network of Wealth Generating Companies, Including Printer](#); Goran Katić and Predrag Zvijerac, [Muk institucija u BiH o daljoj saradnji sa firmama na američkoj 'crnoj listi' povezanim sa Dodikom](#) [Silence of the BiH institutions regarding further cooperation with firms on the American 'black list'], Radio Free Europe, 19 June 2024.

225 Nacionale, 2023. [Arrestohet drejtori i KEK-ut, Nagip Krasniqi](#) [KEK director Nagip Krasniqi arrested]; Nacionale, 2025. [Apeli e lë në fuqi aktakuzën e Nagip Krasniqit për dallaveret në KEK](#) [The appeal upholds Nagip Krasniqi's indictment for fraud at KEK].

226 Nacionale, 2025. [Apeli e lë në fuqi aktakuzën e Nagip Krasniqit për dallaveret në KEK](#) [The appeal upholds Nagip Krasniqi's indictment for fraud at KEK]; Nacionale, 2025. [Apeli anulon zgjatjen dymujore të paraburgimit për Nagip Krasniqin](#) [Appeal annuls two-month extension of detention for Nagip Krasniqi].

227 Radio Free Europe, May 2025. Почнува судењето за предметот „Адитив“ [The trial in the case "Additive" begins]. <https://www.slobodnaevropa.mk/a/33428338.html>.

228 Ibid.

229 Nataša Latković, [„Okolo sokolovo“ od 50.000 i polovni „pauk“ za 95.000 evra](#) [“Hawk eye” of 50.000 and used tow truck for 95.000 euros], Radar, 14 February 2025.

230 Bianet, February 2024. Court cancels tender for Atatürk Airport “Nation's Garden”. <https://bianet.org/haber/court-cancels-tender-for-aturk-airport-nation-s-garden-291746>

231 [Public Procurement Law](#) (Official Gazette of Bosnia and Herzegovina 39/2014, 59/2022, 50, 2024), Article 52.

232 Contracting authority representatives include managers, members of board of directors, managing board, and supervisory board members, members of the public procurement commission, or other individual involved in implementation or how can influence the decision of the contracting authority in the public procurement procedure. The obligation extends to close family members of the contracting authority representatives. See: [Public Procurement Law](#) (Official Gazette of Bosnia and Herzegovina 39/2014, 59/2022, 50, 2024), Article 52.

233 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#), p. 37.

234 Ibid.

235 Ibid, p. 38

236 [Public Procurement Law](#) (Official Gazette of Bosnia and Herzegovina 39/2014, 59/2022, 50, 2024), Article 52.

237 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#), p. 37.

238 See: <https://open.ejn.gov.ba/docs/index.html>.

239 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#), p. 40; Alen Vejzagić, [Otvoreni podaci u javnim nabavkama u Bosni i Hercegovini](#) [Open data in public procurement in Bosnia and Herzegovina], Centar za zastupanje građanskih interesa (CIP), 2024.

240 Transparency International Bosnia and Herzegovina, 2025. [Assessing political integrity rules in Bosnia and Herzegovina](#), p. 37.

241 Ibid, p. 39.

242 Ibid, p. 41.

243 Ibid, p. 38.

244 Ibid, p. 41.

245 Ibid, p. 41.

246 European Commission (EC), July 2025. [Bosnia and Herzegovina 2024 Report](#), p. 59.

247 [Law on Public Procurement](#) (No. 04/L-042, 04/L-237, 05/L-068, 05/L-092).

248 Diana Metushi Krasniqi, [Unveiling weaknesses: A critical review of Kosovo's political integrity regulations](#), Kosova Democratic Institute (KDI), 2025, p. 54.

249 Ibid, p. 55.

250 Ibid, p. 55.

251 Ibid, p. 62.

252 Ibid, p. 60.

253 Ibid, p. 57.

254 Telegrafi, 28 April 2024, [In three months, 108 secret contracts were signed, an investigation is required](#).

255 Ibid, p. 55.

256 Ibid, p. 57.

257 European Commission (EC), October 2024. [Kosovo* 2024 Report](#), pp. 54-55.

258 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 27; There is also an ethical code for conducting public procurement. See:

259 Ibid; [Law on Prevention of Corruption and Conflicts of Interest](#) (Official Gazette of RM 12/2019), Article 45.

- 260 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 28.
- 261 [Law on Public Procurement](#), Article 35.
- 262 See: <https://e-nabavki.gov.mk/PublicAccess/Home.aspx#/home>.
- 263 See: <https://www.bjn.gov.mk/category/publikacii/red-flags-izvestai/>; Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 29.
- 264 Ibid, p. 29.
- 265 European Commission, July 2025. [2025 Rule of Law Report Country Chapter on the rule of law situation in North Macedonia](#), p. 11.
- 266 [Law on Concessions and Public Private Partnerships](#) (Official Gazette of RM, 6/2012, 144/2014, 33/2015, 104/2015, 215/2015, 153/2019, 261/2019), Article 20.
- 267 Marija Sunchevska, [Political integrity rules assessment in North Macedonia](#), Transparency International North Macedonia, 2025, p. 31.
- 268 Ibid.
- 269 Ibid.
- 270 These include “1) contracting authority/entity’s manager, or responsible person, or member of the administrative, executive or supervisory board of the contracting authority/entity, 2) a member of public procurement committee, i.e., person conducting of public procurement procedure.” See: Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 22.
- 271 [Law on Public Procurement](#), Article 50.
- 272 Miša Bojović and Miloš Đorđević, [Assessing political integrity rules in Serbia](#), Transparency Serbia, 2025, p. 22.
- 273 See: <https://jnportal.ujn.gov.rs/>.
- 274 Ibid, p. 23.
- 275 Ibid, p. 23.
- 276 Ibid, p. 24.
- 277 Full name: [Zakon o posebnim postupcima radi realizacije međunarodne specijalizovane izložbe EXPO Belgrade 2027](#) (Official Gazette of the Republic of Serbia, 92/2023) [Law on special procedures for implementation of the international specialised exhibition EXPO Belgrade 2027].
- 278 Transparency Serbia, 2025. [Dok Ustavni sud ćuti poslovi za EXPO se ugovaraju bez konkurencije](#) [While the Constitutional Court stays silent, businesses for EXPO are concluded without competition].
- 279 Ibid.
- 280 Transparency Serbia, 2024. [Poseban zakon za EXPO i njegova primena](#) [The special EXPO law and its implementation].
- 281 European Parliament, October 2025. [European Parliament resolution of 22 October 2025 on the polarisation and increased repression in Serbia, one year after the Novi Sad tragedy](#).
- 282 [Public Procurement Law](#), Article 11; Transparency International Türkiye, 2025. [Assessing political integrity rules in Türkiye](#), p. 36.
- 283 Transparency International Türkiye, 2025. [Assessing political integrity rules in Türkiye](#), p. 36.

- 284 Ibid, p. 36.
- 285 Ibid, p. 36.
- 286 Miloš Resimić, Accountability loading: [A survey of open data for enhancing political integrity in the Western Balkans and Türkiye](#), Transparency International, 2024.
- 287 Ibid, p. 39.
- 288 European Commission (EC), October 2024. [Türkiye 2024 Report](#), pp. 49-50.
- 289 Ibid.
- 290 UNCACoalition, n.d. [Analysis of CoSP10 Adopted Resolutions](#); UNODC, 2023. [Tenth session: Conference of the States Parties to the United Nations Convention against Corruption \(Atlanta, United States of America, 11-15 December 2023\)](#).
- 291 UNCACoalition, n.d. [Analysis of CoSP10 Adopted Resolutions](#); UNODC, 2023. [Tenth session: Conference of the States Parties to the United Nations Convention against Corruption \(Atlanta, United States of America, 11-15 December 2023\)](#).
- 292 These recommendations are consistent with the commitments set out in Resolution 11/7 of the Conference of the States Parties to the United Nations Convention against Corruption (2025), which calls for strengthened transparency, oversight, inter-agency cooperation, and regulation of political finance. See: Conference of the States Parties to the United Nations Convention Against Corruption, 11/7, [Preventing and combating corruption through enhancing transparency in the funding of political parties, candidatures for elected public office, and electoral campaigns](#), 2025, pp. 28-33.
- 293 Jon Vrushi and Isabelle Büchner, Bringing the receipts: [Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 19; Transparency International, 2024. [Standards for integrity in political finance: A global policy position](#), p. 6.
- 294 Jon Vrushi and Isabelle Büchner, Bringing the receipts: [Political Finance Transparency in the Western Balkans and Türkiye](#), Transparency International, 2023, p. 19.

Katalogimi në botim – (CIP)
Biblioteka Kombëtare e Kosovës “Pjetër Bogdani”

35.08(497+560)

Krasniqi, Diana Metushi
Unveiling Weaknesses : a survey of challenges and strengths in asset and interest
declaration, political finance, and public contracting regulations in the Western
Balkans and Türkiye / Diana Metushi Krasniqi and Miloš Resimić. - Prishtinë :
Kosova Democratic Institute (KDI), 2026. – 50 f. : ilustr. ; 21 cm.

1. Resimić, Miloš

ISBN 978-9951-745-50-5

ISBN 978-9951-745-50-5



9

789951

745505

Kosova Democratic Institute

Address: Str. Bajram Kelmendi, Nr. 239,
10000, Prishtina, Kosovo

Tel.: +383 (0)38 248 038

E-mail: info@kdi-kosova.org

Web: www.kdi-kosova.org