

APPROVED

Resolution No. XIV-1178 of  
the Seimas of the Republic  
of Lithuania of 28 June 2022



NATIONAL  
ANTI-CORRUPTION  
AGENDA FOR 2022-2033

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SEIMAS OF THE REPUBLIC OF LITHUANIA

**RESOLUTION  
ON THE APPROVAL OF THE NATIONAL  
ANTI-CORRUPTION AGENDA  
FOR 2022-2033**

28 June 2022 No. XIV-1178  
Vilnius

The Seimas of the Republic of Lithuania, in accordance with Article 7(2) and (8) of the Law on Prevention of Corruption of the Republic of Lithuania and Article 15(2) of the Law on Strategic Management of the Republic of Lithuania, assessing corruption as a threat to national security and seeing the need for the state institutions to carry out targeted and coordinated anti-corruption actions, hereby decides:

**Article 1.**

Approve the National Anti-Corruption Agenda for 2022-2033 (attached).

**Article 2.**

Declare the Resolution No. XII-1537 of the Seimas of the Republic of Lithuania of 10 March 2015 "On the Approval of the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025" null and void.

Speaker of the Seimas

Viktorija Čmilytė-Nielsen

# CHAPTER I

## GENERAL PROVISIONS

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### SECTION ONE

#### LEGAL BASIS FOR THE DRAFTING OF THE NATIONAL ANTI-CORRUPTION AGENDA FOR 2022-2033

1. The National Anti-Corruption Agenda for 2022-2033 (hereinafter - the Agenda) is being drafted with a view to implementing fundamental changes in the reduction of corruption, and to create a consistent and comprehensive corruption-resilient environment in the country. Progress in the fight against corruption not only has an impact on social maturity, the economy, governance and justice, but also contributes to national security interests.
2. The European Commission's annual Rule of Law Reports, published on 30 September 2020, underlines that the fight against corruption is one of the guarantors of a country's democracy and rule of law.
3. The Law on Prevention of Corruption of the Republic of Lithuania (Law No. XIV-471 of 29 June 2021) defines corruption as the abuse of power for the purpose of benefiting oneself or another person in the public or private sector.
4. The agenda has been prepared taking into account the State Progress Strategy "Lithuania 2030", approved by the Resolution No. XI-2015 of the Seimas of the Republic of Lithuania of 15 May 2012 "On the Approval of the State Progress Strategy "Lithuania 2030", as well as the National Progress Plan for 2021-2030 approved by Resolution No. 998 of the Government of the Republic of Lithuania of 9 September 2010 "On the Approval of the National Progress Plan for 2021-2030", the Law on Strategic Governance of the Republic of Lithuania, the Law on Prevention of Corruption, the international legal acts in the field of the fight against corruption, the analysis of the environment, the results of the sociological studies, the proposals submitted by the public, state and municipal institutions and bodies, as well as international practice.

5. The Agenda replaces the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025, approved by the Resolution No. XII-1537 of the Seimas of the Republic of Lithuania of 10 March 2015 "On Approval of the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025" (hereinafter - the Programme), and implements the priorities and long-term tasks for the development of the state's national security system as enshrined in the National Security Strategy approved by the Resolution No. IX-907 of the Seimas of the Republic of Lithuania of 28 May 2002 "On Approval of the National Security Strategy" and ensures the continuity of the Strategy, while also creating prerequisites to make qualitative changes in the anti-corruption policy.




## SECTION TWO

# INITIATIVES OF THE EUROPEAN UNION AND INTERNATIONAL ORGANISATIONS IN THE FIELD OF CORRUPTION PREVENTION

## Initiatives of the European Union


6. Convention of 26 May 1997 on the fight against corruption involving officials of the European Communities or Officials of Member States of the European Union, drawn up in accordance with Article K.3(2) clause c of the Treaty on European Union (hereinafter - the Convention), the purpose of which is to require each Member State of the European Union (hereinafter - the EU) to take the necessary measures to criminalise corruption involving officials of the European Union and the Member States of the EU and to ensure judicial cooperation between EU Member States in this area and to impose criminal liability on the directors of a company, or on other persons having decision-making powers within the company or exercising control over the company's activities, in respect of the cases of corruption referred to in the Convention, where the offences are committed by a person under their authority acting on behalf of the company.
7. Council Framework Decision 2003/568/JHA of 22 July 2003 on combating corruption in the private sector criminalises both active and passive corruption.
8. Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud affecting the financial interests of the Union by means of criminal law establishes minimum rules on the criminalisation of, and penalties for, criminal offences with a view to reinforcing the protection of the Union's financial interests against fraud affecting those interests, in line with the EU principle *acquis communautaire* in this area. In accord-




ance with Directive (EU) 2017/1371, Member States shall take measures to ensure that intentional passive and active corruption is a criminal offence. Directive (EU) 2017/1371 requires legal persons to be held legally liable for the criminal offences it covers.

- 9.** On 30 September 2020, the European Commission published an EU-wide Rule of Law Report, which includes information from each EU Member State and provides an overview of positive and negative developments in the implementation of the rule of law across the EU, as well as examining the four pillars of the rule of law: the national justice systems, the anti-corruption systems, media pluralism and freedom, and the other institutional issues related to the system of “checks and balances” that are necessary for an effective democratic governance framework.
- 10.** Importantly, the fight against corruption is seen as a significant and independent element of the rule of law, as important as an effective justice system and media freedom. The European Commission stresses that corruption undermines the functioning of the state and its institutions and creates the conditions for the emergence of organised crime. An effective anti-corruption framework, transparency and integrity in the exercise of public authority can strengthen the legal system and confidence in public institutions.
- 11.** The European Commission also stresses that the authorities entrusted with the criminal prosecution function must work effectively and impartially. It is essential that courts, prosecutors and pre-trial investigation bodies are equipped with the necessary funds, human resources, technical capacity and expertise. The European Commission notes that it is important to achieve a balance between the privileges and immunities granted to public officials, so that they are not used as a cover to avoid criminal prosecution for corruption offences.
- 12.** In 2021, the European Commission approved funding for the 2021 technical assistance project “Effective Implementation of the National Anti-Corruption Strategy”, which provides for the assistance of international experts in the preparation of the Agenda and its plan of measures.

## Initiatives of the Council of Europe

- 13.** The most important measures adopted by the Council of Europe to fight against corruption are the Criminal Law Convention on Corruption, signed on 27 January 1999, and the Civil Law Convention on Corruption, signed on 4 November 1999. The Criminal Law Convention on Corruption and the Civil Law Convention on Corruption reflect the Council of Europe’s view of corruption as a threat to democratic values, the rule of law, human rights and social and economic progress.
  - 14.** The Criminal Law Convention on Corruption aims to harmonise the criminalisation of corruption. It also provides for additional criminal law measures and enhanced international coop-
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eration on criminal prosecution of offences of a corrupt nature. The Criminal Law Convention on Corruption proposes to extend liability for such crimes to the private sector.


- 15.** The Civil Law Convention on Corruption defines general rules of international civil law and anti-corruption law, which oblige States to provide in their domestic laws for effective remedies for victims of corruption and to give them the opportunity to protect their rights and interests, including the possibility of obtaining compensation for damages.
- 16.** Lithuania has been a member of the Council of Europe's Group of States against Corruption (GRECO) since 1999. The purpose of this group - to monitor countries' compliance with anti-corruption standards of the Council of Europe.

## Initiatives of the United Nations

- 17.** The United Nations Convention against Corruption (hereinafter - the Convention against Corruption), signed on 10 December 2003, is the first global legal instrument against corruption. Parties to the Convention against Corruption are encouraged to develop and implement effective, coordinated anti-corruption policies based on the prevention of corruption, the criminalisation of corruption, international cooperation, and the effective return of proceeds of corruption. Lithuania ratified the Convention against Corruption on 5 December 2006 and it entered into force on 20 January 2007.
- 18.** Lithuania's first evaluation report under the Convention against Corruption was approved in 2013. In principle, all the recommendations for Lithuania indicated in the report have been implemented.
- 19.** On 2 June 2021, the United Nations session adopted a joint political declaration entitled "Our Common Commitment to Effectively Addressing Challenges and Implementing Measures to Prevent and Combat Corruption and Strengthen International Cooperation".

## Initiatives of the Organisation for Economic Co-operation and Development

- 20.** In 2018, Lithuania became a member of the Organisation for Economic Co-operation and Development (hereinafter - OECD), and before becoming a member on 20 April 2017, Lithuania ratified the Convention of 21 November 1997 on Combating Bribery of Foreign Public Officials in International Business Transactions (hereinafter - the OECD Convention), which entered into force on 15 July 2017. The OECD Convention is designed to prevent bribery in international business transactions and applies only in the case of bribery of for-
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eign officials. It establishes legally binding standards to criminalise the bribery of foreign officials in international business transactions and provides other measures to ensure the effectiveness of these standards.

- 21.** The Convention is monitored by the OECD Working Group on Combating Bribery of Foreign Public Officials in International Business Transactions. Lithuania's first and second phase evaluation reports were approved in 2017. The working group stressed that Lithuania has already made significant progress in strengthening its legal framework against foreign bribery, but that more needs to be done to ensure effective enforcement of anti-bribery laws on corporate liability and the application of sanctions for bribery of foreign public officials, including confiscation. In 2019, Lithuania's second phase progress assessment was approved, concluding that the majority of recommendations have been fully or partially implemented. Lithuania's next assessment is due in 2022.


## SECTION THREE

### THE COUNTRY'S ANTI-CORRUPTION ENVIRONMENT



#### Criminalisation of corruption


- 22.** National criminal law criminalises the promise, offer or giving of any unlawful reward by a person to a public politician, a public official or a civil servant, as well as the direct or indirect solicitation by a public politician, a public official or a public servant of any unlawful reward to himself or herself or to another person or the acceptance of such a reward, including the offer or promise of a reward for the exercise or non-exercise of certain functions or the acceptance of an exclusive position or favour, the promise, offer or giving of any unlawful reward by a person to any person who claims to be in a position to influence the decisions of a public politician, a public official or a civil servant, as well as the direct or indirect request or acceptance of any unlawful reward by a person who claims to be in a position to influence the decisions of a public politician, a public official or a civil servant or the acceptance of any such reward or of an offer or promise of any such reward, and the aiding and abetting of any of the acts set out in this paragraph.
- 23.** Active and passive bribery, trading in influence, malpractice and other criminal offences fall under the category of corruption offences if they are committed in the public administration sector or in the provision of public services for the purpose of obtaining an




advantage for oneself or for others. Acts of a corrupt nature also include acts intended to conceal acts of corruption. Not only civil servants, but also natural and legal persons are liable for corruption offences.

- 24.** In order to harmonise the criminal laws of the Republic of Lithuania with the requirements of the OECD Convention, amendments to the Criminal Code of the Republic of Lithuania and the Code of Criminal Procedure of the Republic of Lithuania were drafted and adopted in 2016-2017, which expanded the scope of liability for corruption-related offences. It also provides that a legal person may be held liable in cases where a natural person is exempted from criminal liability for an act committed by him or her, or is not held liable for other reasons. The Criminal Code also establishes that a legal person is liable not only when its employee or authorised representative commits a criminal offence as a result of a lack of supervision or control by its manager, but also on the latter's instructions or authorisation. It also provides that a legal person may be held liable for acts committed by another legal person, controlled or representing it, for the benefit of a legal person referred to above. The Criminal Code also makes it a criminal offence to pay a bribe both directly (by giving it yourself) and through an intermediary.
- 25.** For the purposes of forfeiture, the Criminal Code defines the result of bribery as the direct or indirect receipt, in whatever form, of property, including pecuniary gain, resulting from an act or omission in the exercise of powers by a civil servant or a person equivalent to a civil servant, whether or not the gain is derived from the carrying out of an activity that may be lawfully carried out in accordance with the procedures laid down by the law, or from the performance of an activity which may not be lawfully carried out. In addition to the criminalisation of illicit enrichment, the the Law on Civil Asset Forfeiture, which entered into force on 1 July 2020, establishes the institute of confiscation of civil property and regulates the legal grounds, conditions and procedure for the confiscation of civil property, which creates additional preconditions for the State to recover property that is not consistent with the person's legitimate earnings and that has been obtained from corruption-related criminal offences.

## Institutional framework to control corruption

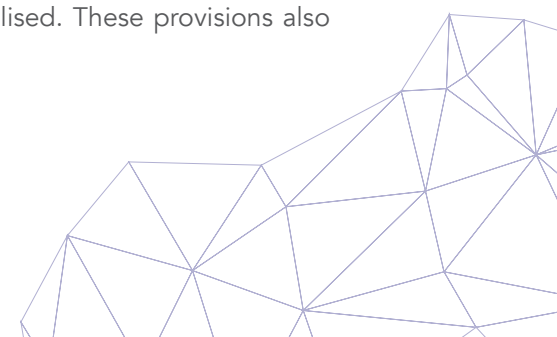
- 26.** The European Commission's Rule of Law Report for Lithuania of 30 September 2020 notes that Lithuania has a largely established institutional framework for fighting corruption. In this context, the key role of the Special Investigation Service of the Republic of Lithuania, which combines policy coordination and prevention competences with investigative powers, is highlighted.
- 27.** The Special Investigation Service is a specialised anti-corruption law enforcement institution operating since 1997, which carries out criminal prosecution of corruption-related offences, criminal intelligence, corruption prevention, analytical anti-corruption intelligence
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and anti-corruption education. It is accountable to the President of the Republic and the Seimas of the Republic of Lithuania. The Law on the National Security Basics of the Republic of Lithuania stipulates that the Special Investigation Service, together with the Ministry of National Defence of the Republic of Lithuania and the State Security Department of Lithuania, are the institutions that ensure national security.

- 28.** Lithuania has established a mechanism for interaction between the institutions carrying out criminal prosecutions for corruption-related offences.
- 29.** In all law enforcement institutions: Police Department under the Ministry of the Interior of the Republic of Lithuania, the State Border Guard Service under the Ministry of the Interior of the Republic of Lithuania, the Prison Department under the Ministry of Justice of the Republic of Lithuania, Customs Department of Lithuania, and the Financial Crime Investigation Service under the Ministry of the Interior of the Republic of Lithuania all have immunity units that are in place and are responsible for carrying out corruption prevention, criminal intelligence and criminal prosecutions for corruption-related offences.
- 30.** Institutional interaction is carried out in accordance with the provisions of the Code of Criminal Procedure and the agreement between the criminal intelligence authorities and the Prosecutor General's Office of the Republic of Lithuania on cooperation and coordination of criminal intelligence activities.
- 31.** In cases of corruption offences, pre-trial investigations are usually organised and led by prosecutors from the Organised Crime and Corruption Investigation Units of the Regional Prosecutor's Offices, or, in particularly important cases of this kind, by prosecutors from the Organised Crime and Corruption Investigation Department of the Prosecutor General's Office.
- 32.** The Chief Official Ethics Commission (hereinafter - the COEC), the Central Electoral Commission of the Republic of Lithuania (hereinafter - the CEC), the Seimas Ombudsman's Office of the Republic of Lithuania, the State Tax Inspectorate under the Ministry of Finance of the Republic of Lithuania, the National Audit Office of the Republic of Lithuania, the Office of the Prosecutor General of the Republic of Lithuania and other state and municipal institutions and bodies, as well as civil servants, all play a role in the control of corruption.

## Legal framework for the prevention of corruption

- 33.** The European Commission's Rule of Law Report of 30 September 2020 highlights that the legal framework for the fight against corruption in Lithuania is largely in place, with passive and active corruption, as well as trading in influence criminalised. These provisions also apply to foreign officials.
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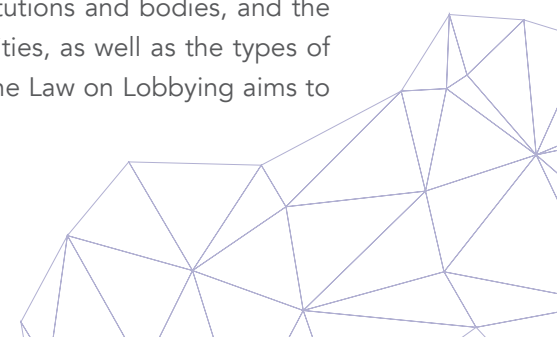
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- 34.** Corruption prevention in Lithuania is regulated by a separate law - the Law on Prevention of Corruption was adopted by the Seimas in 2002, and in 2021 it was reworded in a new version, which entered into force on 1 January 2022.
  - 35.** The Law on Prevention of Corruption establishes the basic principles, goals and objectives of the prevention of corruption in the public and private sectors, measures for the creation of a corruption-resistant environment and their legal basis, the subjects of corruption prevention and their rights and obligations in the field of prevention of corruption.
  - 36.** Preventing corruption aims to strengthen national security, build social well-being, improve the quality of administrative, public and other public services, and protect the freedom of fair competition, so as to minimise corruption as an impediment to democracy and the economy. The main objectives of corruption prevention are: to create a corruption-resistant environment, to raise anti-corruption awareness, to systematically and in a coordinated manner address corruption risk factors, to reduce the risk of corruption, to create the preconditions for a coherent and efficient functioning of the system of entities involved in the prevention of corruption, to reduce the economic incentives for corruption, to ensure the active engagement of the private sector and of the general public in corruption prevention, and to foster the provision of transparent, fair, and open administrative, public, and other services.
  - 37.** The Law on Prevention of Corruption encourages voluntary activity and involvement of entities in the creation of a corruption-resistant environment, and aims to ensure that each public sector entity and its head personally takes the necessary steps to create an anti-corruption environment, and that new corruption prevention measures are introduced as well as those that have proven to work well.
  - 38.** The first National Anti-Corruption Programme of the Republic of Lithuania was approved by the Resolution of the Seimas of the Republic of Lithuania No. IX-711 of 17 January 2002 "On the Approval of the National Anti-Corruption Programme of the Republic of Lithuania" and the Programme was approved in 2015. The programme's strategic objective is to reduce corruption, increase transparency and openness in the public and private sectors.
  - 39.** Resolution of the Government of the Republic of Lithuania No. 648 of 17 June 2015 "On the Approval of the Interinstitutional Action Plan for the Implementation in 2015-2019 of the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025" approved the Interinstitutional Action Plan (hereinafter - the IAP) for the Implementation in 2015-2019 of the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025.
  - 40.** At the end of the implementation period of the IAP and following the evaluation of the monitoring of the implementation of the Programme for 2015-2019, the Government of the Republic of Lithuania, by Resolution No. 1232 of 4 November 2020 "On the Approval
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of the Interinstitutional Action Plan for the Implementation in 2020-2022 of the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025”, approved the Interinstitutional Action Plan for the Implementation in 2020-2022 of the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025.

- 41.** Commission of the Government of the Republic of Lithuania for the activities of state institutions in the field of anti-corruption has been established to coordinate the activities of state institutions in the field of the fight against corruption, approved by the Resolution of the Government of the Republic of Lithuania No. 1188 of 21 November 2018 “On the Establishment of the Commission of the Government of the Republic of Lithuania to coordinate the fight against corruption”, which is chaired by the Prime Minister.

## Managing conflicts of interest and regulating lobbying

- 42.** The OECD stresses that while conflicts of interest are not inherently a corruption offence, corruption inevitably arises when conflicts between the private interests of civil servants and their public duties are inappropriately addressed, or not addressed at all.
- 43.** Civil servants, members of the Seimas and the Government, and other persons declaring a private interest must avoid any conflict of interest and behave in a manner that does not cast doubt on their integrity. A Risk and Conflict of Interest Management Information System has been established for this purpose.
- 44.** In 1997, the Law on Coordination of Public and Private Interests in The Republic of Lithuania was adopted. On 1 January 2020, a new version of this law entered into force. Its purpose is to enable the disclosure of the private interests of public officials and other persons referred to in this Law, to ensure that the public interest takes precedence in decision-making, and to prevent conflicts of interest and corruption. The data of the current declarations of private interests are public, with the exception of the data set out in Article 10 of the Law on Coordination of Public and Private Interests. This law prohibits persons who are obliged to declare their private interests from performing official duties which are related to their private interests. A Register of Private Interests has been established to collect, collate, process, organise, store and report the data submitted in declarations.
- 45.** The Law on Lobbying Activities of the Republic of Lithuania was adopted in 2000 and its new version entered into force on 1 January 2021. The Law regulates lobbying activities, their supervision and liability for violations of these activities, defines the rights and obligations of lobbyists, the duties of state and municipal institutions and bodies, and the obligations of persons who are influenced by lobbying activities, as well as the types of activities that are not considered to be lobbying activities. The Law on Lobbying aims to
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ensure the publicity and transparency of lobbying activities and to prevent illegal lobbying. The Law on Legislative Framework of the Republic of Lithuania establishes the regulation of persons influencing lawmaking.


- 46.** The COEC was established to implement the Law on Coordination of Public and Private Interests and the Law on Lobbying Activities by the Resolution of the Seimas of the Republic of Lithuania No. VIII-1332 of 23 September 1999 “On the Chief Official Ethics Commission”. The Law on the Chief Official Ethics Commission of the Republic of Lithuania was adopted in 2008 and its new version entered into force on 1 January 2020. The purpose of the COEC is to ensure that public authorities and those who work in them serve the people ethically. The COEC also monitors the implementation of the Code of Conduct for State Politicians of the Republic of Lithuania.
- 47.** In carrying out its functions and taking its decisions, the COEC shall be independent and shall act in accordance with its statutory powers. State politicians, public officials, political parties, civil servants, associations, other legal or natural persons are prohibited to interfere in the activities of the COEC.


## Financing of political parties and political campaigns

- 48.** In Lithuania, the procedures and accountability for the financing of political parties and political campaigns are fairly strictly regulated, and there is a system in place to control the financing and financial activities of political parties and political campaigns. Legal persons are prohibited from making any form of donation to political parties or political campaigners and political advertising is strictly regulated. Lithuania is currently among the most advanced countries in terms of legal regulation of political campaign financing, disclosure of financing and access to information (the list published by “Transparency International” includes the following countries: France, Lithuania, Costa Rica, the United Kingdom, Singapore, Ireland, Canada, Norway, South Korea, Sao Tome and Principe, Portugal, Belgium, Czech Republic, Finland).
- 49.** The financing of political parties and political campaigns shall be monitored by the CEC according to the procedures and forms established by law. It is the permanent supreme state institution for organising and conducting elections and referendums, as provided for in the Constitution of the Republic of Lithuania. It conducts and organises elections to the Seimas, the President of the Republic and municipal councils, as well as referendums, in accordance with the law. Since 2002, the legal status, tasks, powers, principles of operation, as well as the procedure for its establishment, organisation of its work and financing, have been regulated by a separate legal act - the Law on the CEC of the Republic of Lithuania.

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- 50.** The amendments to the Criminal Code, which came into force on 1 January 2020, criminalising the illegal financing of political parties and political campaigns, and the amendments to the Law on the Prevention of Corruption, will have an impact on the reduction of corruption risks related to the illegal financing of political parties and influence on political processes, amendments to the Law on the Control of Political Campaign Financing and Funding and related legal acts, which increase the number of political parties entitled to receive appropriations from the state budget, the number of state budget funds and the procedure for allocating those funds, the introduction of stricter requirements for the provision of party member contributions and the holding and reporting of party funds, and the strengthening and extension of the powers of the CEC to investigate financing-related irregularities, the possibility to suspend the allocation of state appropriations or part thereof for serious violations of the law, and administrative and criminal liability for the financing of a political party or a political campaign without the right to do so, or the use of such funds, as well as the detailed procedure for the settlement of debts of a political campaign.

## Protection of whistleblowers

- 51.** On 1 January 2019, the Law on the Protection of Whistleblowers of the Republic of Lithuania entered into force and its provisions apply to both the public and private sectors. It sets out a list of basic measures to protect, encourage and assist whistleblowers, outlines how these measures may be applied and prohibits disciplinary action, dismissal from employment or service, demotion, transfer to a lower post or to another place of employment, or any other adverse action against the person who has provided information. It also provides for legal remedies for whistleblowers and financial incentives for whistleblowers, and provides that a whistleblower who has participated in the commission of an infringement and has reported it to the competent authority may, in accordance with the procedures laid down in certain legal acts, be exempted from liability for his or her participation in the commission of an infringement. The law establishes a norm for the establishment and functioning of internal channels for reporting infringements.
- 52.** The competent authority that is receiving reports or information about violations, examining them in accordance with its competence or referring them to other authorities, as well as coordinating the process of protection and assistance to whistleblowers in accordance with the Law on the Protection of Whistleblowers is the Prosecutor's Office of the Republic of Lithuania.
- 53.** Resolution of the Government of the Republic of Lithuania No. 1133 of 14 November 2018 "On the Implementation of the Law on the Protection of Whistleblowers of the Republic of Lithuania" approves the legal acts implementing the Law on the Protection of Whistleblowers: Description of the procedures for the remuneration of whistleblowers for
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valuable information, Description of the procedures for the compensation of whistleblowers for the negative effects or potential effects of a report, Description of the procedures for establishing and ensuring the functioning of internal whistleblowing channels..

## Raising anti-corruption awareness


- 54.** The Convention against Corruption identifies anti-corruption education as one of the essential foundations for strengthening the public sector. This Convention highlights the importance of public participation in anti-corruption activities. One of the main recommended areas is the implementation of public education programmes, which is why anti-corruption topics are included in the general curricula of primary, basic and secondary education.
- 55.** In order to involve even more entities in the creation of an anti-corruption environment, to better connect corruption prevention experts and promote cooperation between them, in 2020 Lithuania established the “Integrity Academy” - a place for exchange of best anti-corruption practices, where experts with the highest experience and expertise share their experience and advice on how to create a corruption-proof environment in an organisation. The exchange of good practices of the “Integrity Academy” was initiated by the President of the Republic and the related activities are organised by the Special Investigation Service.
- 56.** Currently, the most active group in transparency initiatives is civil servants.
- 57.** In order to systematically develop anti-corruption attitudes in the public sector, the focus is on the development of measures with lasting value, the training of civil servants responsible for the prevention of corruption in the institutions, the use of the personal examples of the leaders of the organisations in the creation of an anti-corruption environment, and the development and provision of secure reporting channels.
- 58.** Anti-corruption education for young people is not only delivered through direct communication (lessons and lectures), but also through other awareness-raising tools such as comics, animated videos, and interactive teaching tools. The tools developed are presented to young people in an attractive way, with the aim of giving them as many choices as possible to develop competences related to transparency or its promotion.
- 59.** The financial benefits of transparency and practical examples are prioritised in the development of anti-corruption attitudes in business, and an Anti-Corruption Handbook for Business has been drawn up to help businesses create an anti-corruption environment.

# CHAPTER II

## ANALYSIS OF THE CURRENT SITUATION




- 60.** According to the evaluation of the World Economic Forum 2018, the impact of corruption is estimated at up to 5% of global gross domestic product (hereinafter - GDP). The World Bank estimates that businesses and individuals spend more than USD 1,000 billion on bribes every year.
- 61.** A study conducted by the “RAND Europe” Institute at the request of the European Parliament in 2016 (available online: [https://www.europarl.europa.eu/RegData/etudes/STUD/2016/579319/EPRS\\_STU%282016%29579319\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2016/579319/EPRS_STU%282016%29579319_EN.pdf)) estimates that the EU loses approximately €817-€990 billion annually due to corruption, i.e. between 4.9% and 6.3% of the EU’s GDP, and that the results of the Corruption Perceptions Index (CPI) in Lithuania could be used to estimate the risk of corruption as high as €4.491 billion (11.42% of GDP).
- 62.** The Economic Report on Lithuania presented by the OECD in 2020 states that if Lithuania’s corruption control indicator reaches the average level of the European region of the OECD member states (i.e., on a scale from -2.5 to 2.5, it increases from 0.68 to 1.18), it would contribute to a faster growth of Lithuania’s GDP. A better control of corruption is projected over the next ten years: resulting in GDP growth of 1.3% and 3.3% over ten years. (OECD Economic Survey of Lithuania, Table 1.6).
- 63.** Looking at the changes in Lithuania’s anti-corruption environment over the period 2015-2020, the country’s indicators are approaching the average score of EU Member States. The World Bank’s Worldwide Governance Indicators score for Lithuania on the Control of Corruption indicator was 71 in 2015, 7 points below the EU average, and 75 in 2019, just 2 points below the EU average. In the international organisation’s “Transparency International” study “Corruption Perceptions Index”, Lithuania’s gap compared to the EU countries in this respect was 6 points in 2016 and 4 points in 2020.
- 64.** It should be noted that the value of bribery has decreased significantly in 2015-2020. According to the survey “Lithuanian Map of Corruption”, 9% of the population had to pay a bribe in 2020, i.e. the experience of bribery among the population has decreased by 2.7



times since 2014 (24% in 2014). A review of the results of the survey “Eurobarometer No. 483: Business Attitudes to Corruption” shows that, according to the European Commission’s Business Enterprise Survey, the likelihood of being exposed to bribe extortion in the course of business has decreased by 3 times (21% in 2015, 7% in 2019), while the results of the “Eurobarometer No. 482: Business Attitudes to Corruption”, the rate of corruption as an obstacle to business has almost doubled (28% in 2015, 15% in 2020).

- 65.** In the period 2015-2020, the share of the population willing to report corruption remained almost the same (18% of the population in a target group in 2014, 19% in 2020), while the share of business managers in a target group decreased (36% in 2014, 28% in 2020). The number of people willing to engage in anti-corruption activities has been declining in both the population and business executives groups (12% in the population in a target group in 2014, 8% in 2020, 21% in the business executives in a target group in 2014, 8% in 2020). Positive changes can only be seen in the anti-corruption potential of civil servants: the share of civil servants willing to report corruption increased by 24% to 53% in 2020, while the share of those willing to participate in anti-corruption activities increased by 6% to 28% in 2020.
- 66.** There has been a significant positive change in the actual experience of corruption in Lithuania during the Programme implementation period. According to the “Lithuanian Map of Corruption 2020” survey, the actual bribery of citizens, business managers and civil servants, measured as the number of bribes paid over a five-year period, has decreased from 31% to 16%. (planned target for 2019 - 20%). In 2020, it was 15%. This shows a downward trend.
- 67.** However, Lithuania failed to meet the Programme’s target of achieving the 65-point score in international organisation’s “Transparency International” survey “Corruption Perceptions Index” by 2019. The CPI score in Lithuania was 60 in 2019 (just one point higher than in 2015), and remained the same at 60 in 2020.
- 68.** The “Lithuanian Map of Corruption 2020” survey shows that Lithuanian citizens, business leaders and civil servants still believe that bribes help solve problems. Intermediate assessment indicators show that the proportion of those who feel this way was 46% in 2019, while the planned target of 45% in 2019 has increased to 53% in 2020.
- 69.** Despite the relatively large number of measures that have been and are being implemented, the impact on the corruption situation is rather fragmented, with insufficient progress in priority areas, many of which are still problematic. The main reason for the failure to achieve the results envisaged in the Programme is the formal approach of the public sector and the declarative measures planned, which do not lead to substantive change.
- 70.** Although Lithuania has a legal and institutional framework in place to ensure the detection, prevention and public education of corruption crimes, this framework cannot be static. In the light of developments, it needs to be refined and developed taking into account



the link between corruption and national security: corruption should be seen as a threat to national security and the fight against corruption as a prerequisite for and a key component of ensuring national security.

- 71.** Despite the efforts made and the positive developments, anti-corruption awareness-raising, prevention and investigation of corruption offences need to be improved and developed.
- 72.** In order to increase the effectiveness of corruption prevention, fragmented anti-corruption activities, formal and, in some cases, superficial approaches, as well as measures that do not create value from an anti-corruption point of view should be abandoned. The proactivity, leadership, attitude and commitment of the leaders involved in the prevention of corruption would also increase the effectiveness of the prevention of corruption. Those designated to create a corruption-resilient environment must be suitably qualified and have the necessary competences. The involvement of civil society, business and non-governmental organisations in the creation of a corruption-resilient environment in both the public and private sectors would be an important support for the creation of an anti-corruption environment in the country.

# CHAPTER III

## THE STRATEGIC OBJECTIVE, IMPLEMENTATION ORIENTATIONS AND PROGRESS TARGETS OF THE AGENDA

### SECTION ONE

#### THE STRATEGIC OBJECTIVE OF THE AGENDA, THE ORIENTATIONS FOR IMPLEMENTATION

- 73.** The Agenda's strategic objective - to create a corruption-resilient environment in the public and private sectors.
- 74.** The Agenda's strategic objective is to be pursued through three strands:
- 74.1.** to form anti-corruption attitudes and develop anti-corruption competences;
  - 74.2.** to achieve sustainable political, managerial, administrative and financial solutions that are resistant to undue influence, and quality public and administrative services;
  - 74.3.** to achieve effective control of corruption and the impartial, objective administration of justice and the rule of law.

**Table.** Monitoring indicators for the Agenda, corresponding to the general monitoring indicators of the National Progress Plan

Name of the indicator	Initial value 2020	Target for 2025	Target for 2029	Target for 2033	Source of the data
Percentage of people who think that bribes help solve problems	71	40	30	20	Data from the survey "Lithuanian Map of Corruption"
Corruption awareness index, score	60	70	71	74	Data from the survey "Transparency International"
Corruption control index, score	75 (2019)	80	83	85	World Bank



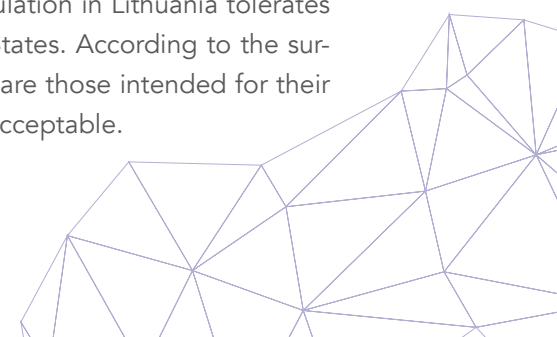
## SECTION TWO


# PROGRESS TARGETS FOR THE IMPLEMENTATION OF THE AGENDA ORIENTATIONS

## Progress targets for the implementation of the anti-corruption attitudes and competences development orientation


- 75.** Diagnostic studies of the anti-corruption environment show that corrupt behaviour associated with favouritism and patronage, lack of transparency in decision-making and other manifestations of systemic corruption are becoming more and more relevant. The contribution of civil society - citizens, non-governmental organisations, public information media, business and academia - to the development of Lithuania's anti-corruption environment is very significant. An active, demanding and responsible civil society is not only one of the factors contributing to a reduction in corruption, but also a guarantor of national security in the broadest sense. For this purpose, there is a need to raise public awareness of the damage caused by corruption and to foster intolerance of corruption, and to encourage the private sector to introduce measures to strengthen the resilience of companies to corruption, while creating a culture of zero-tolerance. The development of anti-corruption competences and anti-corruption attitudes in the public sector must continue.
- 76.** Progress targets for the implementation of the anti-corruption attitudes and competences development orientation:
- 76.1.** to strengthen the anti-corruption awareness of the population;
  - 76.2.** to promote the implementation of corruption-resilient standards in the private sector;
  - 76.3.** to develop anti-corruption competences in the public sector;
  - 76.4.** to promote the anti-corruption role of the media.


## Strengthening of citizens' anti-corruption awareness

- 77.** According to the results of the 2019 EU representative survey on corruption published by the European Commission in June 2020, 44% of the population in Lithuania tolerates corruption. This is the 8th highest rate among EU Member States. According to the survey, the most tolerated gifts to public sector representatives are those intended for their personal benefit. 37% of respondents consider this practice acceptable.
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- 78.** According to the “Lithuanian Map of Corruption 2020” survey, 19% of the population is willing to report corruption if they encounter it. The survey of the European Commission referred to above shows that only 6% of respondents who have experienced corruption in practice report it to the relevant authorities. According to the same survey, the share of respondents saying that bribes help solve problems has increased significantly, with 71% of respondents saying this (61% in 2019). This indicator has reached the 2014-2016 level.
  - 79.** Raising anti-corruption awareness requires improving the general legal and civic literacy of the population, expanding their knowledge of the harm caused by corruption, and fostering intolerance of corruption.
  - 80.** One of the priorities in fostering anti-corruption awareness in society must be the education of young people, and the allocation of resources to strengthen the anti-corruption awareness of young people is of particular importance, as the extent to which the public will tolerate corruption in the future will depend on the level of tolerance of corruption by this group of society.
  - 81.** In order to engage young people in anti-corruption awareness-raising, it is important to have direction and leadership from education and study policy-making institutions.
  - 82.** Teachers and lecturers acquire the right competences to work with pupils and students.
  - 83.** In order to raise young people’s awareness of the importance of transparency, there is a need to increase their knowledge of the harms of corruption and the benefits of anti-corruption behaviour, and to encourage them to focus on experiences of transparent decision-making, as well as to cooperate with youth organisations and opinion leaders, to raise anti-corruption awareness through the dissemination of good practices and the organisation of various transparency initiatives.


## Promoting the implementation of anti-corruption standards in the private sector

- 84.** The results of the survey “Lithuanian Map of Corruption 2020” show that a significant number of company managers are willing to tolerate corruption: one in four company managers would probably give a bribe to solve their own problems (5% of the respondents indicated that they would give a bribe to solve their company’s problems, and 20% – that they would do it according to the circumstances), and a slightly higher percentage of more than one in four managers would report it if they were confronted with corruption (in 2020 - 28%). The proportion of managers willing to report corruption has fallen by 7% over the last five years. (35% in 2016).
  - 85.** More people know where to go to report corruption: In 2007, only 35% of the companies surveyed knew where to go, in 2020, this figure rises to 66%.
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- 86.** According to international organisation's "Transparency International" Lithuanian Division, in 2019, out of the 40 largest companies operating in Lithuania, only 17 had a publicly available corporate code of conduct or ethics applicable to all employees, and only 16 of the largest companies announced that they had an internal reporting channel that could be used by employees to safely and confidentially report a potential case of corruption in the company.
  - 87.** According to the survey "Lithuanian Map of Corruption 2020", in 2020, 10% of companies indicated that they provide anti-corruption training, and 33% have an internal code of conduct encouraging employees not to take or give bribes.
  - 88.** It should be noted that even in 22 EU countries, a higher proportion of the population believes that the only way to build a successful business is to have political connections. Lithuania is one of these countries. Moreover, in 24 EU countries, a higher proportion of respondents agree that favouritism and corruption are an obstacle to business competition in their country. In Lithuania, 68% of respondents agreed with this statement. Looking at trends in the EU Member States, most of them (22) have the view that corruption is part of business culture. Lithuania is close to the EU average, with 64% of respondents agreeing (14th place in the EU).
  - 89.** The focus on creating a transparent environment is increasing and Lithuania's performance in this respect has been assessed as better than average among EU Member States, but the introduction of anti-corruption mechanisms in Lithuanian companies is not a sufficiently widespread practice, which is why it needs to receive more attention in the private sector. In order to increase the resilience to corruption in the private sector, it is appropriate to develop a system that encourages a more proactive approach to strengthening the resilience of companies to corruption, to develop standards of transparency and a culture of zero tolerance to corruption.

## Developing anti-corruption competences in the public sector

- 90.** According to the survey "Lithuanian Map of Corruption 2020", the anti-corruption potential of civil servants is higher than that of the population or business representatives: half (53%) of the civil servants who are confronted with corruption are willing to report it, and 28% of the representatives of the above-mentioned group would like to take part in anti-corruption activities. It is important to maintain and strengthen this anti-corruption capacity in the public sector and to encourage public sector actors to be more proactive in creating a corruption-resilient environment.
  - 91.** In order to help civil servants identify and respond to corruption, it is necessary to increase their knowledge of the ways and mechanisms by which corruption occurs. Greater atten-
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tion needs to be paid to improving the anti-corruption competences of those responsible for the prevention of corruption in institutions. Anti-corruption prevention specialists must be able to independently guide the staff of their institution or subordinate institutions towards anti-corruption awareness.

- 92.** The creation of an anti-corruption environment in an institution and good results depend first and foremost on the personal attitude, example and responsibility of managers, which is why managers' attitudes towards the creation of a corruption-resilient environment must be a priority.
- 93.** Civil servants need to be aware of the damage that corruption causes, not only to the state, but also to certain sectors and people. It is not enough for a civil servant to be aware of potential corruption, but to be prepared to report it through whistleblowing channels, and to understand how the whistleblower protection system works in both the public and private sectors.
- 94.** Tools must be developed to enable civil servants to develop anti-corruption competences on their own.
- 95.** Greater attention needs to be paid to strengthening the anti-corruption capacity of municipal councils and municipal executive bodies and improving anti-corruption competences.

## Promoting the anti-corruption role of the media

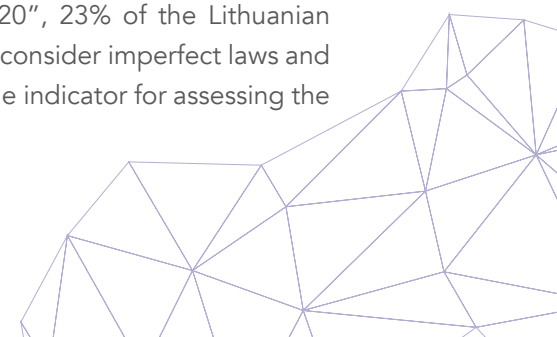
- 96.** According to the survey "Lithuanian Map of Corruption 2020", the main sources of corruption-related information received by the population are television (50%), the internet and online media (30%). The latter in particular is growing in importance. It is therefore particularly important to publicise not only cases of criminal offences of a corrupt nature, but also achievements in the prevention of corruption and the country's progress in anti-corruption.
- 97.** On the other hand, the media can be seen as a business, using unethical or illegal practices to put pressure on public sector decision-makers to take decisions that benefit certain interest groups or entities.
- 98.** In addition to shaping opinion, the media promotes transparency in the public and private sectors. It is also often used to change stereotypes and shape public opinion, which is why the anti-corruption role of the media must also be significant. Ideally, the media should act as decision-making control institutes, making a significant contribution to accountability. Strong investigative journalism is seen as an effective tool for deterring corruption and exposing specific cases of corruption. However, there must also be a debate on the transparency of the media and the responsibility of journalists, producers and disseminators of public information for the dissemination of false or misleading information.




## Progress targets for achieving sustainable political, managerial, administrative and financial decisions resistant to undue influence and quality public and administrative services

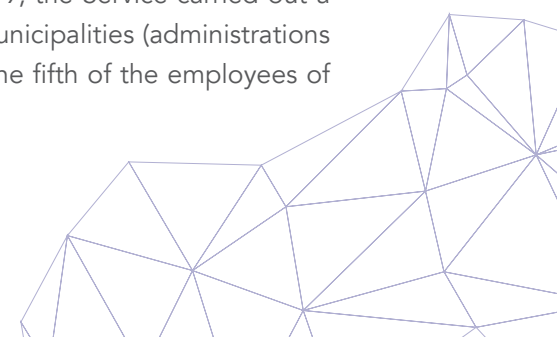
- 99.** The key preconditions for transparency and accountability in the public sector are the involvement of citizens and civil society in public governance and information transparency. In order to improve access to information for different groups in society and to encourage citizens' participation in decision-making, it reduces the scope for non-transparent and corrupt agreements to emerge. The focus must be on legal solutions and culture change in the public sector to ensure sustainable political, managerial, administrative and financial solutions that are resistant to undue influence, and quality public and administrative services.
- 100.** Targets for progress towards sustainable political, managerial, administrative and financial solutions resistant to undue influence and quality public and administrative services:
- 100.1.** improve the legislative process;
  - 100.2.** manage conflicts of interest more effectively;
  - 100.3.** reduce the influence of illegal lobbying;
  - 100.4.** creating a progressive and competitive civil service;
  - 100.5.** strengthen control over the financial activities of political organisations and political campaigns;
  - 100.6.** strive for transparency and openness in decision-making related to public finance and asset management;
  - 100.7.** ensure the operation of a transparent, simple and efficient public procurement system;
  - 100.8.** optimise and improve the system of supervision of economic operators;
  - 100.9.** improve the availability and quality of public and administrative services;
  - 100.10.** promote public involvement in decision-making and monitoring.


## Improving the law-making process

- 101.** According to the survey "Lithuanian Map of Corruption 2020", 23% of the Lithuanian population, 15% of business leaders and 23% of civil servants consider imperfect laws and loopholes in legal regulation to be a very serious problem. The indicator for assessing the urgency of the problem has increased.
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- 102.** The National Audit Office's National Audit Report No. VA-2018-P-40-6-2 of 16 March 2018, "Law-making process", also highlighted the problems of the legislative process, noting that responsible law-making is not always ensured in the drafting and adoption of legislative acts.
  - 103.** Political will is not always enough to take decisions that are unfavourable to some narrow interest groups. For example, in order to address corruption in the health care system, the IAP of the previous period already foresaw amendments to the Laws of the Republic of Lithuania on the Health System and other laws obliging the Ministry of Health of the Republic of Lithuania to coordinate the activities of not only tertiary level, but also of the primary and secondary level of the health care institutions, but so far the amendments have not been adopted.
  - 104.** Unclear, redundant regulation and inconsistent legislation complicate the application of the law, give rise to legal disputes, increase the administrative burden on the public and private sectors, give rise to corruption, and create the preconditions for the irrational and inefficient use of the state and municipal budgets and other resources, and must therefore be tackled systematically.
  - 105.** Building a sustainable anti-corruption environment requires a shift towards evidence-based lawmaking, the protection of legislative initiatives from undue influence, and an effective system for assessing the impact of corruption. Greater attention should be paid to anti-corruption assessment of draft and adopted legislation.

## More effective management of conflicts of interest


- 106.** The results of the survey "Lithuanian Map of Corruption 2020" show that residents, business leaders and civil servants rank forms of favouritism - nepotism and patronage of political party members - among the most common forms of corruption in Lithuania. In the target groups, nepotism was reported as prevalent in 2020 indicated by 74% of the population (70% in 2019); 61% of company managers (65% in 2019); and 54% of civil servants (54% in 2019). In 2020, 66% of the population (64% in 2019); 57% of company representatives (63% in 2019); and 61% of civil servants (60% in 2019) considered patronage of members of political parties to be common.
  - 107.** One form of favouritism, nepotism, can arise when there is a kinship between individuals, one of whom has administrative authority over his or her relative. In recent years, the Special Investigation Service has carried out and published a number of investigations that have shown the extent of nepotism in Lithuania. In 2018-2019, the Service carried out a study on the intensity of the risk of nepotism in Lithuanian municipalities (administrations and municipally-owned companies) and found that almost one fifth of the employees of
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municipal administrations and municipally-owned companies are related by kinship, marriage or sister/brother- in-law ties.

- 108.** The number of persons declaring a private interest in Lithuania is steadily growing. The launch of the Register of Private Interests in 2021 makes it less likely for public sector representatives to make mistakes in their declarations, improves the conditions for declarations, and makes it easier to coordinate public and private interests.
- 109.** State and municipal institutions and bodies need to put in place effective internal measures to manage conflicts of interest and to increase institutional proactivity in the prevention and control of conflicts of interest. It is necessary to ensure that government decisions are not influenced by the private interests of politicians, interest groups or public sector workers.

## Reducing the influence of unlawful lobbying


- 110.** Legitimate lobbyists and their legitimate activities are an element of a democratic society. Transparent lobbying is good for society and can lead to more effective law-making and public policy-making.
  - 111.** Unlawful lobbying threatens the transparent, democratic legislative process: non-transparent government decisions that can be detrimental to the public interest, a high risk of corruption crimes, and low levels of trust in public institutions.
  - 112.** The public is critical of legislative transparency in Lithuania. According to the survey “Lithuanian Map of Corruption 2020”, 58% of the population, 49% of business executives and 43% of civil servants perceive the adoption of legislation that favours particular groups as one of the most common forms of corruption in Lithuania.
  - 113.** Respondents felt that the construction, pharmaceutical and healthcare sectors were the most likely to be influenced (64% in construction, 63% in pharmaceuticals and 53% in healthcare according to the civil servants’ target group, and 57% in pharmaceuticals, 55% in construction and 53% in healthcare according to the business executives’ target group). According to the respondents, the most frequent lobbyists are registered lobbyists (53% in the target group of civil servants, 52% in the target group of company executives), associations (52% in the target group of civil servants, 33% in the target group of company executives), and companies (46% in the target group of civil servants, 35% in the target group of company executives).
  - 114.** Recently, there have been positive trends in lobbying activities in Lithuania: the number of registered lobbyists publicly declaring their activities has been increasing year by year (35 in 2016, 119 in January 2021), and as of 1 January 2021, with the entry into force of the new Law on Lobbying, which introduces cross-declaration of lobbying activities (a
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method of declaring lobbying activities, whereby the lobbyist and the person influenced declare the influence they have exerted on a person involved in the legislative process), individuals should be further encouraged to declare their lobbying activities. According to GRECO, Lithuania has already implemented the recommendation to establish rules on the relations of members of the Seimas with lobbyists and third parties seeking to influence the legislative process. The GRECO report notes that Lithuania is working to improve the regulation of lobbying activities. The law on lobbying is welcomed.


- 115.** Positive trends must continue and information on lobbying, its purpose and the promotion of transparent lobbying must continue to be disseminated to the representatives of the public sector and the public. In order to ensure transparency of lobbying activities, it is necessary to monitor whether the exemptions set out in the Law on Lobbying on lobbying activities are not being abused, and to ensure the above-mentioned cross-declaration of lobbying activities effectively.
- 116.** It is necessary to mitigate the risks associated with the non-disclosure of the true initiators of legislation, where legislative processes are initiated and drafted by interested parties, and submitted by those with the right of legislative initiative as their own initiatives, without disclosing the true interests and interested parties.


## Building an intelligent and competitive civil service

- 117.** The National Audit Office's Review of the Institutional Structure of the Public Sector of 23 January 2020 identifies problems in the public sector related to the management of human resources that are also relevant from an anti-corruption point of view, namely: a plethora of legislation on public sector salary, significant disparities in average salary across public sector institutions, a lack of clear and transparent principles for the application of increments and bonuses or the increase of coefficients for civil servants and contract staff, and an overabundance of service and managerial staff.
  - 118.** In the public sector, there is considerable fragmentation in recruitment, remuneration and certification procedures. Civil servants are held to a much higher standard than contract workers, who are required to carry out functions not directly related to public administration. Practice shows that, although employed persons are not required to carry out functions relating to public administration, this requirement can be disregarded. In state and municipal institutions and bodies, the share of employees with employment contracts accounts for almost half of all employees. There is therefore a risk that a simpler recruitment procedure for contract workers may lead to the recruitment of less competent persons who are more easily influenced by undue influence, and are linked by certain ties (whether by kinship, friendship, affiliation to a political organisation, association or otherwise).
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- 119.** An analytical study carried out by the Special Investigation Service has shown that members of political parties working in municipal administrations receive on average 17% more employment-related income from municipalities than employees working in administrations that are not affiliated to political parties. In some municipalities, the income gap was 57-60%.
  - 120.** In order to improve legislative and administrative decision-making and to reduce the potential for undue influence on decision-makers, particular attention should be paid to developing the competences of the public sector and to ensuring the quality and openness of the selection process for civil servants. A civil servant who lacks professionalism and competence is more vulnerable to corrupt or other undue influence. The OECD recommendations on strengthening a public sector geared to achieving public objectives also emphasise the criterion for selecting competent civil servants.
  - 121.** The strategic and leadership competences of civil servants need to be developed, a talent attraction system needs to be put in place, and modern human resource management tools need to be developed to ensure that the civil service is flexible and responsive to challenges, and that it is able to attract and retain highly qualified civil servants.

## Strengthening control over the financial activities of political parties and political campaigns

- 122.** According to expert research, Lithuania is one of the few countries where information on political campaign financing is publicly available in an online, searchable database (according to the “Varieties of Democracy” (hereinafter - V-Dem) Research Institute’s “Disclosure of Campaign Donations” indicator for 2019).
  - 123.** However, it is not enough for citizens to have confidence in the transparency of political campaign financing, which also depends on the perception of the extent of illegal political campaign financing. According to the “Eurobarometer” survey, Lithuania is one of the countries where the prevailing opinion is that too close ties between business and politicians lead to corruption in the country (86% of the (87% in 2017, 85% in 2013), which is the 4th highest number in the EU and higher than in its neighbours (76% in Latvia, 70% in Estonia and 74% in Poland).
  - 124.** Although data on political campaign finance is publicly available in Lithuania, certain phenomena may remain outside the existing control system. There are situations where legal persons actually fund political parties despite the prohibitions, and there are also cases of disguised political advertising. Thus, some of the risks related to the financing of political parties and political campaigns are still present, and as the legal environment is changing and other attempts are being made to evade legal regulation, the financial control of
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political parties and political campaigns must be strengthened. In addition, the possibility of supporting political parties with unaccounted funds, as well as the use of these funds, must be reduced.

- 125.** The risk of unreported services provided by businesses to political parties or political campaigners also remains.
- 126.** Although the Criminal Code provides for criminal liability for the unlawful financing of political parties and political campaigns as of 2020, and the Law on Prevention of Corruption classifies these offences as corruption offences, there is no established practice in the country for handling such cases. It should be noted that, according to publicly available sources of information, there are not many such cases in the world either (2 in Latvia, 3 in Germany, 2 in Spain and 1 in Canada between 2016-2020). This may be linked to a lack of efforts to create the conditions for effective accountability for such acts.
- 127.** In order to ensure transparency in the financing of political campaigns, it is necessary to reduce the possibilities for legal persons to indirectly finance political parties and political campaigns by supporting legal persons linked to politicians, i.e. funds provided by legal persons to legal persons linked to politicians with beneficiary status should not be used to fund the activities of political parties.
- 128.** Reduce the spread of hidden political advertising. According to the CEC, non-compliance with advertising requirements accounts for a significant proportion of all election-related infringements, which are often linked to links between media owners and politicians.
- 129.** The risks associated with involuntary donations to political parties by natural persons need to be reduced. It should also eliminate the possibility for managers of legal entities linked to political parties to coerce their subordinates to support one or another political party by exerting direct or indirect pressure on them.
- 130.** The analytical capacity of control authorities' staff to identify cases of unlawful donations and/or other funds related to, and likely to unduly influence, political activities and legislation must be strengthened.
- 131.** It is important to address the issue of designating law enforcement authorities responsible for detecting and investigating such offences. Sufficient attention needs to be paid to the development of competences and to the provision of methodologies for detecting and investigating such acts.
- 132.** The issue is the sufficiency of the grounds for the confiscation of these acts and of the civil forfeiture.



## Achieving transparency and openness in public finance and asset management decisions


- 133.** The COVID-19 pandemic that emerged in early 2020 led to unexpected and profound changes in many areas of life. The rapid decisions taken to contain the pandemic and deal with its consequences have shown that such a factor can, in some cases, favour non-transparent behaviour.
- 134.** Despite the fact that, according to the Law on Management, Use and Disposal of State and Municipal Assets of the Republic of Lithuania, state assets must be managed, used and disposed of in accordance with the principles of public utility, efficiency, rationality and public law, there is a risk that decisions taken in relation to the management of these assets may not always be oriented towards the pursuit of the greatest benefit to society.
- 135.** The National Audit Office's National Audit Report No. VAE-6 of 15 July 2020 "Management of State immovable property transferred to municipalities under the right of entrustment" stated that more than half of the State immovable property under the right of entrustment was either not used by the municipalities or was not used to perform the functions for which it was intended. One third of the municipalities that hold state immovable property in trust do not have accurate information on the state immovable property they manage. The audit found that in the cases analysed, the municipalities did not adequately assess the necessity of the assets and the Government, when transferring the assets to the municipalities, also did not make sure that the assets were necessary for the performance of the public (state delegated to the municipalities) functions. The absence of a system for monitoring and controlling the use of State immovable property creates incentives to use State property for other activities or not to use it at all.
- 136.** Investigations of the Special Investigation Service, corruption risk analyses and evaluation of anti-corruption legislation and projects highlight corruption risks related to the legality and reasonableness of the granting of state land for use (lease, entrustment or other right) to other persons. One of the current issues in state land lease is the lease of state land for the intended use of existing buildings. The commercial attractiveness of public land leads to the acquisition of abandoned, dilapidated, disused buildings or parts of buildings, garages, storerooms, etc., with the intention not to exploit them for their immediate purpose, but with the intention of developing, on a preferential basis, new real estate projects on the state-rented land, which are not feasible in the normal course of development.
- 137.** Changes are needed to increase transparency and reduce corruption risks in the management, use and disposal of public land.
- 138.** Greater attention needs to be paid to the protection of the public interest, to the monitoring and coordination of public interest activities, to the application of the right of recourse,




to the opening up of data relating to the management of state and municipal property, and to the aim of ensuring adequate and proportionate revenues to the state budget for the use of state-owned property - land.

- 139.** Corruption risk management in public finance should focus on improving public financial management processes, transparency, reasonableness, openness and efficiency in decision-making. It is important to establish transparent decision-making procedures for the use of the financial resources of the programmes and funds to ensure that critical needs are funded and that programme/fund resources are not used for personal gain or for the benefit of a particular business interest group.
- 140.** All public investment and EU and other international financial assistance should be planned in the same way as far as possible. This would create a common framework for the justification, selection, management and monitoring of projects, while at the same time reducing the potential for irrational use of resources, double funding of projects and the risk of corruption.


## Ensuring a transparent, simple and efficient public procurement system

- 141.** Identifying and justifying the needs of contracting authorities, planning and executing public procurement, overseeing the performance of public purchase and sales contracts, and controlling public procurement are still some of the riskiest areas for corruption. Although public procurement has a particular focus on creating a corruption-proof environment, and a relatively large number of measures were foreseen and implemented in the IAP of the previous period, the Special Investigation Service's analysis of corruption risks, analytical anti-corruption intelligence investigations, pre-trial investigations, and public opinion surveys show that there are some signs of change in the area of public procurement, but that more rapid progress should be made.
  - 142.** According to the European Commission's survey of 2019 "Eurobarometer 482: Business attitudes to corruption in the EU", public procurement in Lithuania is perceived as unfavourable to business. As many as 37% of Lithuanian companies surveyed involved in public procurement reported that corruption had prevented them from winning a public procurement tender in the last three years.
  - 143.** Lack of professional skills in public procurement is often as much a problem as outright corruption. Good procurement professionals and their expertise are key to identifying the needs of contracting authorities, planning and executing procurement, and thus reducing the risk of corruption. According to the National Audit Report No. VA-2018-P-900-1-4 of 2018 "Functioning of the Public Procurement System", around 70% of procurement
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procedures are carried out by specialists with a purely supplementary function, and only around 10% of them perform purely procurement-related functions. It is therefore essential that procurement in the public sector is carried out by competent procurement professionals with procurement as their core activity.

- 144.** There is a need to improve and simplify public procurement procedures, which, when they are complex, in some cases begin to focus not on the content of the procurement but on the objective of meeting the requirements of the procedure.
- 145.** Increasing the scale of centralised procurement makes it possible to entrust procurement to professional central purchasing organisations, which are capable of competently assessing the needs of the contracting authorities, selecting the optimal procurement methods, and carrying out the necessary public procurement procedures.
- 146.** Reduce the share of single-supplier procurement. Lack of competition in public procurement increases the cost of goods, services or works and reduces the scope for rational use of public funds. According to the Public Procurement Office, the share of single-supplier public procurement in Lithuania in 2020 was 40.5%.
- 147.** Most single-supplier procurement is the result of objective reasons, as well as improperly chosen qualification requirements, agreements between market players, long-term market sharing between a small number of suppliers operating in the same segment, etc.
- 148.** The problem of corrupt relations between the contracting authority and the supplier, often manifested by artificially restricting competition with other suppliers, the likelihood of undetected prior agreements between participants in a public procurement, and the procedure for the exclusion of suppliers from public procurements remains an issue to be further developed. Insufficient market research and advice in procurement planning, the prices of goods, services and works procured through public procurement are not in line with market prices for similar products.
- 149.** In order to control corruption risks, more attention must be paid to internal agreements. These transactions risk the use of funds without fair competition and without ensuring the principles of public procurement, increasing the risk of corruption and creating the potential for irrational and inefficient use of public funds. The legal framework (Article 10(2) of the Law on Public Procurement of the Republic of Lithuania; Article 9(2) of the Law on Local Self-Government of the Republic of Lithuania), which entered into force on 31 December 2019, has increased the possibilities for internal agreements. According to the Public Procurement Office, 37 internal agreements worth €609.7 million were concluded in 2019. In 2020, there were already 83 such agreements, worth €796.2 million.
- 150.** The increase in public procurement and the rapid process of digitisation call for more centralised procurement. Better quality, comprehensive, systematic and easily accessible up-to-date procurement data in digital format is needed. This would ensure greater trans-



parency in public procurement, enable more effective analysis of procurement data, timely identification of corruption risks and informed conclusions to improve public procurement. It is also crucial that such data is used by decision-makers to make changes.


## Optimising and improving the system of supervision of economic entities

- 151.** In the World Economic Forum's "Global Competitiveness Report 2019", the regulatory burden of government in Lithuania is rated as higher than in its neighbours, with a score of 38 points (85th out of 141), 42.5 points to Latvia (67th out of 141), and 52 points to Estonia (22nd out of 141).
- 152.** Since 2009, Lithuania has been implementing initiatives to improve the activities of supervisors of economic entities with the aim of streamlining the supervisory functions performed by the authorities, i.e. to ensure that supervisory functions in the country are carried out in an efficient, coordinated manner, at the lowest cost and with the least disruption to the activities of the supervised entities, while at the same time minimising the chances of corruption.
- 153.** Despite the current progress, the area of supervision of economic entities is vulnerable to corruption risks.
- 154.** Risk assessment is a tool to increase the efficiency of supervision of economic entities and to reduce the risk of corruption, but the results of the assessment of the Ministry of Economy and Innovation of the Republic of Lithuania of the progress of the supervisory entities' activities show that the risk assessment tools of the supervisory authorities are inadequate, and that the existing processes should be improved.
- 155.** The procedure for selecting economic entities for verification should also be improved. Supervision of economic entities is not always based on risk assessment principles. Supervisory entities' risk assessment processes do not ensure objective and sound planning of inspections of economic entities and therefore also need to be improved.
- 156.** Different practices of supervisory and control bodies in applying sanctions for infringements, insufficient capacity (human resources of the bodies) to adequately carry out supervisory functions can create conditions for corruption and for the exercise of supervisory functions in a way that discriminates against economic entities, which also needs to change.




## Improving access to and quality of public and administrative services

- 157.** According to the survey “Lithuanian Map of Corruption 2020”, 9% of the population admitted to having paid a bribe at least once in the past year, while 24% of the population disclosed that they had used a useful relationship to get a public service delivered better or faster. In the context of EU Member States, the bribery rate in Lithuania is no longer the highest, but it is still above average. According to the “Special Eurobarometer 502: Corruption”, Lithuania was ranked 19th out of the 28 EU Member States in 2019, with 9 countries ranking higher and 18 countries ranking lower.
- 158.** According to the survey “Lithuanian Map of Corruption 2020”, the public perceives healthcare institutions as the most prevalent places for corruption (in response to an open-ended question, healthcare institutions were identified as such by 51% of the population (first place), by 31% of company managers (second place), and by 47% of civil servants (first place). According to the survey “Special Eurobarometer 502: Corruption”, the largest share of the population is exposed to bribery in healthcare institutions, but it should be noted that illegal payments in these institutions are often not related to the direct demand for a bribe by the medical staff, but rather to the respondent’s perception of the need for an additional payment for the service provided.
- 159.** The survey “Special Eurobarometer 502: Corruption” shows that one in ten people who visited an institution in 2019 had to make an extra payment in addition to their official contributions, such as a payment, a gift to medical staff or a donation to a hospital. According to the data of the survey “Lithuanian Map of Corruption 2020”, the most problematic in this respect are the institutions providing healthcare services at a higher level: republican hospitals and clinics, and hospitals in cities and districts (the highest rates of bribe-giving, according to the responses of the group of the population of the year 2020, were found in the republican hospitals (13%) and in the hospitals in cities and districts (10%).
- 160.** According to the “Lithuanian Map of Corruption 2020”, corruption risk analyses, analytical anti-corruption intelligence activities, pre-trial investigations and public surveys show that the situation is changing, but not intensively enough.
- 161.** The risk of petty corruption faced by citizens can be seen in many areas, but the health sector is one of the most pronounced, and more attention needs to be paid to reducing the risk of corruption in this area.
- 162.** The private sector is most likely to face bribe extortion in the area of building permits (6% of respondents indicated that they were expected to pay a bribe to obtain a building permit). Bribery can flourish in areas where processes are complex, lengthy and bureaucratic, and special attention should be paid to both building permits and spatial planning.

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- 163.** A universal measure to reduce the risk of corruption in public and administrative services is the digitalisation of services and processes. The provision of public and administrative services is the area with the highest risk of petty corruption. Accessibility, digitalisation and efficiency of service delivery reduce the preconditions for corruption, while shortcomings in the quality of service delivery increase them.
- 164.** Improving the quality, accessibility and attractiveness of services provided to the private sector and the public, as well as reducing the administrative burden for service users. Better access to publicly held information and data would be useful to improve the quality and availability of public services.

## Promoting public involvement in decision-making and monitoring

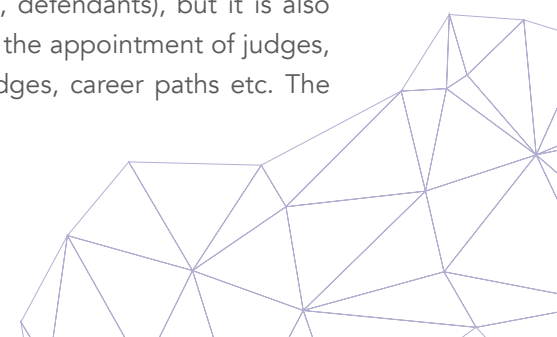
- 165.** According to the survey “Lithuanian Map of Corruption 2020”, only a small proportion of the Lithuanian public believes that all interested groups can be involved in decision-making, and only 21% of civil servants, 9% of the population, and 12% of business executives in Lithuania consider decision-making open. In international research, Lithuania is one of the countries where major decisions are made in consultation with political, social and business representatives, rather than unilaterally, but there is a perception of unequal opportunities to engage in the decision-making process, as shown by the “Range of consultation” indicator of the “V-Dem” survey.
- 166.** There is still a lack of public consultations to involve citizens in the decision-making process, and citizens are reluctant to make use of these opportunities, even if they are aware of them.
- 167.** Improved access to publicly held information and data is essential for transparency in public sector decision-making. Of particular importance from an anti-corruption point of view is the function of opening up data to allow public involvement in decision-making and monitoring. The most relevant and useful data should be opened to the public first.
- 168.** Open data initiatives help to inform citizens more effectively about the activities of the public sector, the decisions taken and the use of state and municipal budgets. Publishing data in a common open format allows the aggregation and analysis of data managed by different institutions, avoiding fragmentation and ensuring higher standards of accountability. Data disclosure and public disclosure of information is a preventive measure that makes it more difficult to conceal conflicts of interest and situations of illicit lobbying, and enables the public sector, citizens, civil society and the private sector to work together in the development of anti-corruption policies that contribute to the integrity of the public sector and to ensuring the prevention of corruption.
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## Progress targets for effective control of corruption and for the impartial, objective administration of justice and the rule of law

- 169.** In order to effectively control corruption and ensure the impartial, objective administration of justice and the rule of law, it is necessary to focus efforts on increasing the efficiency of the justice system, improving access to justice, and increasing public confidence in the courts and the justice system in the broader sense.
- 170.** Targets for progress towards effective control of corruption and impartial, objective administration of justice and the rule of law:
- 170.1.** ensure resilience to corruption in the judiciary and justice system;
  - 170.2.** improve the effectiveness of criminal prosecutions;
  - 170.3.** protect the public interest more effectively;
  - 170.4.** recover assets and make reparations more efficiently;
  - 170.5.** ensure the protection of persons who report corruption.

## Ensuring resilience to corruption in the judiciary and justice system


- 171.** Every decision taken in the public sector, from the decision to open a pre-trial investigation or to pursue the public interest, to the provision or refusal to provide public or administrative services, has the potential to escalate into litigation, the resolution of which can consolidate and give meaning or, on the contrary, render futile any anti-corruption efforts. For this reason, transparency in the judiciary and in the justice system in general must continue to be pursued, and making this system more resilient to corruption is essential, both in terms of controlling corruption and, more generally, in terms of the rule of law and eliminating legal nihilism.
- 172.** Developing the capacity of the judiciary to act independently and impartially in the administration of justice in corruption-related cases has an impact on the overall prevention of all criminal offences, including those of a corrupt nature. However, the issue of corruption prevention is not only relevant to the relationship between court staff and other persons (public and private interested parties, prosecutors, suspects, defendants), but it is also relevant to the internal processes within the courts, including the appointment of judges, the assignment of cases to the courts, the promotion of judges, career paths etc. The
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monitoring of the implementation of the Programme shows that there is a lack of coherence and comprehensiveness when it comes to building resilience to corruption in the justice system: there is a lack of a coherent, systematic and long-term policy for building a corruption-resilient environment in the judiciary.

- 173.** In order to increase the resilience to corruption in the judiciary, systemic, long-lasting strategic anti-corruption policy measures should be implemented, actions should be taken to make the judiciary more transparent, open and innovative, risk factors for corruption that emerge in practice should be identified and monitored on a regular basis, greater attention should be paid to managing conflicts of interest and to ensuring that judges' reputation is upheld, and the centralisation of anti-corruption policy should be implemented.
- 174.** Equally important is the resilience to corruption of other legal professions: lawyers, notaries, bailiffs. These professionals are participants in legal and judicial processes, exercising functions delegated by the State and having the necessary powers to act on behalf of the State. There is a lack of guidance and binding provisions in legislation or codes of ethics to improve the resilience of these professions to corruption. According to the survey "Lithuanian Map of Corruption 2020", 24% of civil servants believe that law firms are one of the groups most likely to influence decision-making in Lithuania (law firms are in the fourth place after registered lobbyists (53%), associations (52%) and companies (46%)). The number of respondents who identify lawyers as seeking to influence has increased by 11% since 2018.

## Improving the effectiveness of criminal prosecutions

- 175.** Since 2017, the number of recorded offences of a corrupt nature has been decreasing. However, while the total number of registered offences is decreasing, the number of serious corruption offences is increasing. In 2017, 591 pre-trial investigations were opened across Lithuania in relation to acts of a corrupt nature, of which 7% were for serious corruption offences, and in 2020, 343 pre-trial investigations were opened, of which 24% were for serious corruption offences. This is due to the consistent work of the Special Investigation Service, which focuses on uncovering large-scale systemic corruption, and the professional preventive and intelligence work of the immunity services of the law enforcement agencies.
- 176.** Experts give maximum points to Lithuania's prosecution of abuse of office. The Bertelsmann Foundation survey "Transformation Index" scores Lithuania 10 out of 10 on the indicator "Prosecution of abuse of office" in 2020, compared to the previous score of 9. Only 5 of the 137 countries assessed in the "Transformation Index" have this rating. Lithuania's score on the effectiveness of prosecutions for abuse of office is three points higher than the average of the 11 EU Member States assessed in the study (7 points). In terms of re-
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gional performance, Lithuania scores three points higher than Latvia and Poland (7 points each). Estonia, like Lithuania, receives the maximum score (10 points).


- 177.** On the other hand, there are indications that the effectiveness of corruption prosecutions could be further improved. According to the European Commission's 2019 survey "Special Eurobarometer 502: Corruption", a higher proportion of the population thinks that high-level corruption in the country is not sufficiently investigated, and there are doubts about the impartiality of the measures. The findings of this survey show a slow but steady increase in the proportion of the population who believe that there are a number of good examples of prosecution in the country that deter corruption.
- 178.** According to the survey "Lithuanian Map of Corruption 2019", residents believe that criminal measures would be the most effective in reducing corruption in Lithuania. In the 2020 survey, the most important reason cited by civil servants to justify bribe-taking was the infrequent prosecution of corruption-related offences (35%).
- 179.** The complex and costly criminal procedure does not, in some cases, ensure that the principle of the inevitability of liability is applied effectively and without delay. Nor does a lengthy process increase public confidence in justice in general. The effectiveness of prosecutions (including criminal intelligence) must continue to be improved.
- 180.** As a result of the current stricter criminalisation policy for corruption offences, the aim must be to ensure that measures are applied in practice that are proportionate to the seriousness of the offences and the harm they cause, and that act as a deterrent to the commission of corruption offences.
- 181.** Leadership and proactivity of the Prosecutor's Office in pre-trial investigations should be encouraged. Cooperation between pre-trial investigation bodies should also be improved. The need to ensure the effective application of anti-corruption laws on the liability of legal persons for bribery of foreign officials, including confiscation of assets, remains a pressing issue.
- 182.** It is important to address the issue of the designation of law enforcement authorities responsible for the detection and investigation of petty corruption offences and to devote sufficient attention to the development of the competences of their staff.
- 183.** Ensuring the rule of law is paramount in criminal prosecutions.
- 184.** The Lithuanian legal framework is not fully in line with international standards, as not all private sector entities can be the subject of corruption offences, and the issue of criminalisation of corruption in the private sector must be addressed.




## More effective protection of the public interest


- 185.** The legislation of the Republic of Lithuania, designed to protect the public interest, empowers more than one institution to do so. In order to ensure adequate protection and defence of the public interest and to reduce the likelihood of such violations in the future, the public interest policy should be reviewed, general practice should be developed, the causes of violation of the public interest as well as the decisions of the Lithuanian Courts and the European Court of Human Rights relating to the defence of the public interest should be systematically analysed, the flawed and potentially infringing legislation should be amended, the right of recourse should be consistently implemented, and the premises of the violation of the public interest should be removed.
- 186.** In addition, a systematic accounting of infringements and decisions on them must be ensured, including oversight and monitoring of regulatory change, irrespective of the institution that was or should have been protecting the public interest. It is still possible for civil servants, heads of state and municipal institutions and bodies who have taken unlawful decisions to avoid liability and compensation for damages due to the ineffective application of the right of recourse, the application of official or other liability, ineffective control of internal administration, and the ineffective elimination of the prerequisites for a breach of the public interest.
- 187.** The active role of institutions with rights and duties to protect the public interest in initiating and defending the public interest must be encouraged.


## More effective property recovery and compensation for damages

- 188.** To date, there is no established practice of systematically identifying, calculating and seeking confiscation of the proceeds of crime or other assets. Extended confiscation of assets and liability for illicit enrichment are rarely used and not very effectively. The arsenal of financial measures in corruption cases is rather limited. The main problem hindering better results in the investigation of illicit enrichment remains the difficulty in denying suspects' claims about the origin of property.
- 189.** The extent to which criminal damage is repaid and/or recovered through court decisions is still unknown, and the process of recovery should be consolidated and a common framework should be established for this process. These processes would make the recovery of the amounts awarded more efficient and provide rapid information on the execution of court judgements for the recovery of the damage caused.
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- 190.** As part of the search for ways to add to the list of criminal measures that have so far been less effective and to strengthen the prevention of organised crime, corruption and self-interested crime, the Law on Civil Confiscation of Property entered into force on 1 July 2020, which creates additional prerequisites for the seizure of assets from corruption-related offences, but there is not yet a well-established practice of its application.
- 191.** Financial investigations, the search for criminal assets, and the necessary data opening and inter-institutional data exchange to locate and trace potentially corrupt property, including, but not limited to, the establishment of a well-established and well-functioning registry of final beneficiaries, need to be given greater attention.
- 192.** In order to ensure the effectiveness of the civil property forfeiture institute, it is necessary to strengthen the prerequisites for its implementation, to continuously monitor and resolve the problems related to its application, to improve the legal regulation of the civil property forfeiture institute and to develop the capacities of the law enforcement authorities in its effective application.

## Ensuring the protection of persons reporting corruption

- 193.** According to the European Commission's 2020 EU population survey "Special Eurobarometer 502: Corruption", the culture of reporting corruption in Lithuania remains low. Only 6% of all respondents who had experienced corruption in the past year said they had reported it to the relevant authorities (unchanged from 2017). In Lithuania, as in 21 other EU Member States, the predominant reason for reluctance to report corruption is the belief that it will be difficult to prove the fact of corruption. Another reason is the lack of confidence that anyone will be punished, and a third is the lack of protection for whistleblowers. The feeling of insecurity is also reflected in the fact that respondents living in Lithuania are slightly more likely (25% of respondents) to report corruption and to receive negative consequences from law enforcement or other institutions. The specific attitudes of the Lithuanian population are also revealed by the fact that respondents in the country are more likely than elsewhere (with the fourth highest rate in the EU) to believe that the reluctance to report is related to the avoidance of extraditing another person.
- 194.** Similar trends were revealed in the survey "Lithuanian Map of Corruption 2020". The public's willingness to report corruption is low: only 19% of the surveyed population, 28% of business managers and 53% of civil servants are willing to report a known case of corruption. The main reason for the prevalence of this trend across all target groups is fear of harm. This is due to a pervasive belief among citizens and business leaders that corruption is not punishable.
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- 195.** An analysis of the practice of applying the Law on Protection of Whistleblowers has shown that whistleblowing is on the rise: In 2019, 68 people provided information, of whom 36 were recognised as whistleblowers. In 2020, 81 persons have already submitted information and 49 decisions have been taken to recognise persons as whistleblowers. The motivation to report is low because there is a lack of confidence that it can actually be done confidentially and that whistleblowers will be protected from negative consequences. The practice of applying the Law on the Protection of Whistleblowers is still emerging.
- 196.** Measures must be taken to encourage and motivate people to report corruption. In order to achieve this, effective protection must first be ensured for both whistleblowers and persons who do not qualify as whistleblowers under the Law on the Protection of Whistleblowers.




# CHAPTER IV

## IMPLEMENTING, MONITORING, EVALUATING AND REPORTING ON PROGRESS ON THE AGENDA

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- 197.** The implementation of the Agenda is coordinated by the Government. The Agenda is set out in Annex 1 to the Agenda.
- 198.** The monitoring and evaluation of progress on the Agenda is organised by an Agenda coordinator appointed by the Government.
- 199.** The evaluation of the implementation of the Agenda's orientations and targets shall be carried out on the basis of the Agenda's general monitoring indicators, as set out in the Agenda table, and the impact indicators, as set out in Annex 2 to the Agenda.
- 200.** The Agenda is implemented in three phases, for which four-year Agenda plans are prepared. The Government coordinates the preparation of these plans.
- 201.** The Agenda plans shall be prepared by the Agenda coordinator appointed by the Government and by the Ministry authorised by the Government, with the participation of the bodies whose heads are the managers of the State budget allocations, as defined in the Law on the Budget Structure of the Republic of Lithuania, and of the budgetary bodies subordinate to them. The drafters of the Agenda plan shall inform the Seimas Committee on National Security and Defence of the draft Agenda plan.
- 202.** The agendas are approved by the government.
- 203.** Citizens, non-governmental organisations, public interest groups, businesses, journalists, public information producers and disseminators are encouraged to contribute to the implementation of the Agenda through their actions.
- 204.** The Agenda reports prepared by the Agenda coordinator are submitted to the President of the Republic, the Parliament and the Government:

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- 204.1.** an annual report, in accordance with the Agenda plan, shall be submitted no later than the end of the second quarter of the current year;
  - 204.2.** a final implementation report shall be submitted within six months of the end of the period set for implementation of the Agenda.
- 205.** The annual and final reports on the implementation of the Agenda shall be made publicly available on the website of the Agenda coordinator.

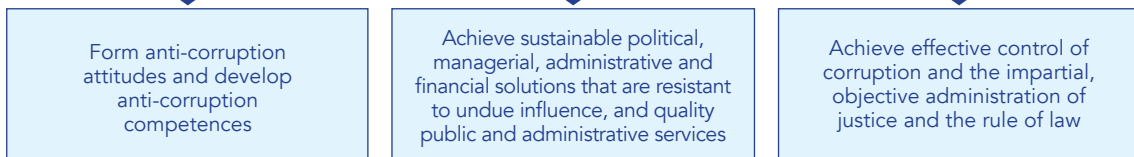
# ANNEXES

## Annex 1 to National Anti-corruption Agenda for 2022-2033

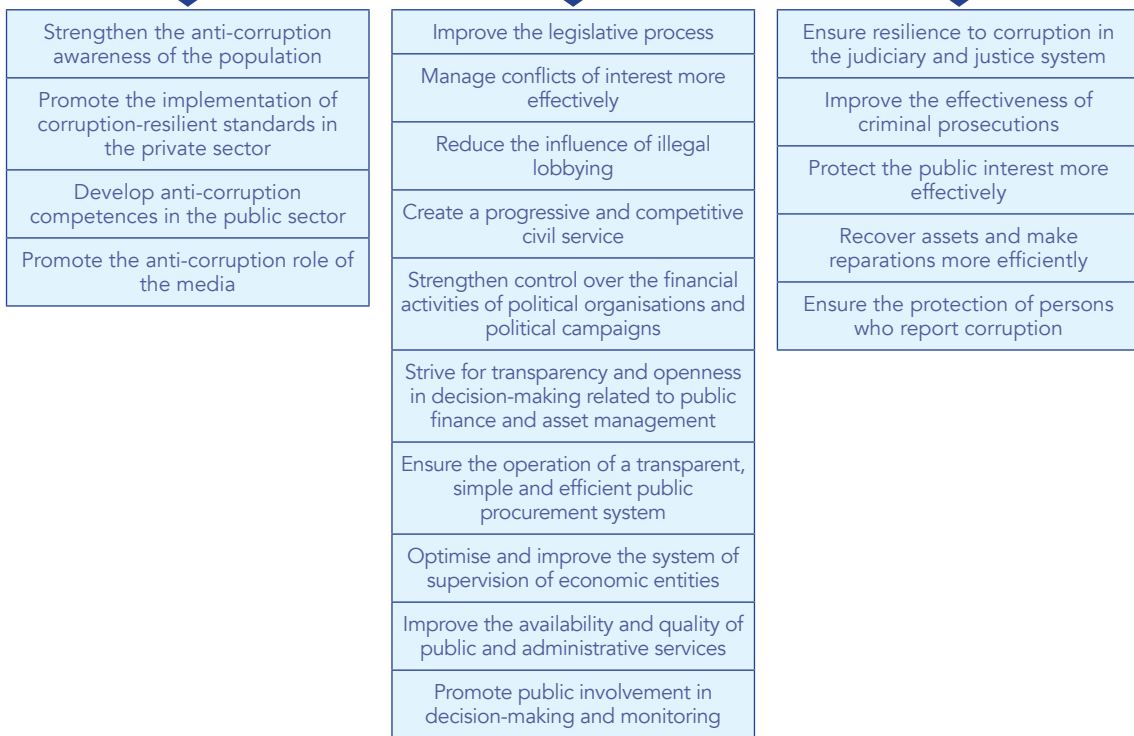
### Scheme of national anti-corruption agenda for 2022-2033

**NATIONAL ANTI-CORRUPTION AGENDA FOR 2022-2033**  
*The strategic objective - to create an anti-corruption environment in the public and private sectors*

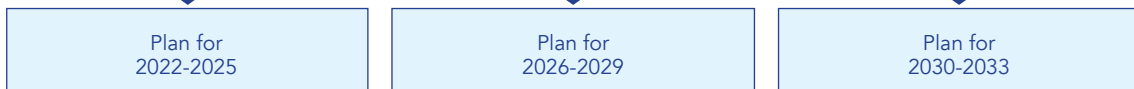
**The strategic objective is pursued through the following orientations:**



**The strategic objective is pursued through the following progress targets:**



**Implementation of the Agenda**



## Annex 2 to National Anti-corruption Agenda for 2022-2033

### Impact indicators for the national anti-corruption agenda for 2022-2033

No.	Impact indicators	Initial value 2020	Target for 2025	Target for 2029	Target for 2033	Source of the data
1.	Percentage of people who think that corruption is widespread in Lithuania	92 (2019)	84	77	70	Data of "Eurobarometer" survey
2.	Percentage of people that paid a bribe in the last 12 months	9	7	5	3	Data from the survey "Lithuanian Map of Corruption"
3.	Percentage of people willing to pay bribes to solve problems	60	50	40	30	Data from the survey "Lithuanian Map of Corruption"
4.	Percentage of company managers willing to pay bribes to solve problems	25	20	15	10	Data from the survey "Lithuanian Map of Corruption"
5.	Percentage of civil servants willing to pay bribes to solve problems	15	11	8	5	Data from the survey "Lithuanian Map of Corruption"
6.	Percentage of people that would report a case of corruption	19	26	33	40	Data from the survey "Lithuanian Map of Corruption"
7.	Percentage of company managers who would report corruption	28	35	45	50	Data from the survey "Lithuanian Map of Corruption"
8.	Percentage of civil servants who would report a case of corruption	53	64	74	80	Data from the survey "Lithuanian Map of Corruption"
9.	Prevalence of corruption in the media, in points	3.89	3.92	3.95	3.98	Data of "Varieties of Democracy Institute"
10.	Increase in the share of company executives who consider the media in Lithuania to be very transparent or transparent, in percentage points from the previous value	not evaluated	5	5	5	Data from the survey "Lithuanian Map of Corruption"
11.	Percentage of respondents who think that decision-making in Lithuania is very open or open	14	23	31	40	Data from the survey "Lithuanian Map of Corruption"
12.	Percentage of business representatives who believe that a business or a representative of a business that has committed a corruption offence will be heavily fined or imprisoned	26 (2019)	33	39	45	Data of "Eurobarometer" survey

## Annex 2 to National Anti-corruption Agenda for 2022-2033

### Impact indicators for the national anti-corruption agenda for 2022-2033

No.	Impact indicators	Initial value 2020	Target for 2025	Target for 2029	Target for 2033	Source of the data
13.	Percentage of people who think that there are good enough examples of criminal prosecution in the country to discourage corruption	34	40	46	50	Data of "Eurobarometer" survey
14.	Indicator on consultation in the adoption of important national decisions	4.31	4.45	4.55	4.6	Data of "Varieties of Democracy Institute"
15.	Percentage of people that participated in local government affairs in the last 12 months	37 (2019)	40	45	48	Data from the Ministry of the Interior of the Republic of Lithuania's assessment of the public's trust in state and municipal institutions and bodies and the quality of service
16.	Budget transparency index of Lithuania, in points	5.93 (2019)	7.5	8	8.5	"Budget Transparency" data based on the "Index of Public Integrity" database
17.	Percentage of single-supplier procurement	28 (2019)	22	16	10	Data of the European Commission's evaluation "Single Market Scoreboard: Public Procurement Performance"
18.	Increase in the number of cross-declarations of lobbying activities, in percentage points from the previous value	not evaluated	5	5	5	Data from the Chief Official Ethics Commission
19.	Number of prior recommendations on the management of conflicts of interest and recusal from potential conflicts of interest in the public sector	9,027	9,500	10,000	10,500	Data from the Chief Official Ethics Commission
20.	Government regulatory burden on business, in points	38	48	55	58	Data from the Global Competitiveness Report
21.	Administrative service delivery and service efficiency coefficient, in points	0.89 (2019)	0.9	0.92	0.93	Data from the Ministry of the Interior's assessment of the public's trust in state and municipal institutions and bodies and the quality of service
22.	Open, Useful and Re-usable Data Index	0.35	0.6	0.8	0.9	Data from the Organisation for Economic Cooperation and Development "OurData Index"

## Annex 2 to National Anti-corruption Agenda for 2022-2033

### Impact indicators for the national anti-corruption agenda for 2022-2033

No.	Impact indicators	Initial value 2020	Target for 2025	Target for 2029	Target for 2033	Source of the data
23.	Increase in the number of civil and administrative actions brought before the courts by public interest institutions for the protection of the public interest, in percentage points from the previous value	not evaluated	5	5	5	Data of National Courts Administration
24.	Increase in the share of assets recovered in corruption cases in relation to the amount awarded by the court, in percentage points from the previous value	not evaluated	5	5	5	Data from pre-trial investigation agencies, the Special Investigation Service of the Republic of Lithuania, the Prosecutor General's Office of the Republic of Lithuania, the National Courts Administration
25.	Increase in the number of persons who provided information to the Prosecutor's Office in accordance with the Law on the Protection of Whistleblowers of the Republic of Lithuania, in percentage points from the previous value	81	5	5	5	Data from the Prosecutor General's Office