

Project against Economic Crime in Kosovo* (PECK)

Second Annual Progress Report

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* This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

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1 BACKGROUND INFORMATION

Project against Economic Crime in Kosovo (PECK) is funded by the European Union and the Council of Europe and implemented by the Council of Europe. The project term is 30 months (1 February 2012 – 31 July 2014).

1.1 Beneficiary and institution(s)

Beneficiary: Kosovo

Main Beneficiary Institution[s]: Kosovo Anti-Corruption Agency (KAA), Financial Intelligence Unit (FIU), Office for Good Governance Human Rights, Equal Opportunities and Gender Issues (OGG) at the office of Prime Minister.

Project Beneficiaries include (but are not limited to) the following key agencies with a role in anti-corruption/anti-money laundering and combating the financing of terrorism in Kosovo:

- Special Prosecutors Office of Kosovo (SPRK)
- Kosovo Judicial Council (KJC)
- Kosovo Prosecutorial Council (KPC)
- Kosovo Police (KP)
- Kosovo Police Inspectorate (KPI)
- Ministry of Justice (MoJ)
- Ministry of Internal Affairs (MIA)
- Ministry of Finance (MF)
- Ministry of Public Administration (MPA)
- Central Bank of Kosovo (CBK)
- Kosovo Intelligence Agency (KIA)
- Agency for Managing Seized and Confiscated Assets (AMSCA)
- Department for Registration and Liaison with NGOs (DRLNGO)
- Kosovo Customs (KC)
- Kosovo Tax Administration (KTA)
- Office of Auditor General (OAG)
- Procurement Review Body (PRB)
- Public Procurement Regulatory Commission (PPRC)
- Central Procurement Agency (CPA)
- Kosovo Assembly (KA)
- Central Electoral Commission (CEC)
- Kosovo Ombudsperson (KO)
- Kosovo Business Registration Agency (KBRA)

1.2 Contracting authority

European Union Office in Kosovo (EUOK).

1.3 Implementing organisation

The Council of Europe is responsible for the implementation of the Project and the use of the Project funds under the European Community agreement with the European Union Office in Kosovo. Within the General Secretariat of the Council of Europe in Strasbourg, Directorate General of Human Rights and Rule of Law, and more specifically the Action against Crime Department, Economic Crime Cooperation Unit is responsible for the overall management and supervision of the Project with a Project Team based in Pristina being responsible for its day-to-day implementation.

2 THE PROJECT

2.1 Overall objective

PECK's overall objective is to contribute to democracy and the rule of law through the prevention and control of corruption, money laundering and financing of terrorism in Kosovo.

2.2 Project purpose

To strengthen institutional capacities to counter corruption, money laundering and the financing of terrorism in Kosovo in accordance with European standards through thorough assessments and recommendations for improving and streamlining economic crime reforms.

2.3 Expected Results (ERs)

The following are the expected results of this Project. Their achievement, will lead to the achievement of the Project purpose and contribute to the overall objective:

Result 1 – Assessment of anti-corruption measures

ER 1.1 Assessment and progress reports are available on the level of compliance of applicable regulations and practices with European standards (based on the experience and criteria used by GRECO and other relevant international bodies);

ER 1.2 Kosovo institutions are capable to support and carry out peer assessments on anti-corruption measures based on European monitoring methodology;

ER 1.3 Recommendations are available on regulatory, institutional, and policy-related areas;

ER 1.4 Assessment and progress reports (including compliance matrix) are published and disseminated in English, Albanian and Serbian.

Result 2 – Assessment of anti-money laundering and combating financing of terrorism measures

ER 2.1 Assessment and progress reports are available on the level of compliance of applicable regulations and practices with European standards (based on the experience and criteria used by MONEYVAL and other relevant international bodies);

ER 2.2 Kosovo institutions are capable to support and carry out peer assessments on anti-money laundering and countering financing of terrorism measures based on the European methodology of other international assessment mechanisms;

ER 2.3 Recommendations are available on regulatory, institutional, and policy-related areas;

ER 2.4 Assessment and progress reports (including compliance matrix) are published and disseminated in English, Albanian and Serbian.

3 EXECUTIVE SUMMARY

This report covers the second year of the implementation of the PECK Project (1 February 2013 to 31 January 2014). During this period, the Project finalised the first comprehensive assessment of Kosovo's compliance with international standards in anti-corruption (AC) and anti-money laundering and combating the financing of terrorism (AML/CFT) areas on the basis of GRECO and FATF/MONEYVAL assessment methodologies specifically tailored for Kosovo, identified gaps, provided recommendations, assessed the progress of their implementation and launched a second assessment cycle. More specifically:

- Two comprehensive assessment reports were prepared and adopted at the plenary meeting in June 2013. They contain the analyses of AC and AML/CFT frameworks, the identified deficiencies and recommendations for bringing legislative and organisational reforms to improve compliance with international standards. The reports also provide a solid basis for streamlining international technical assistance to Kosovo in the area of economic crime.
- The assessment of progress made to implement the recommendations was initiated in October 2013. Progress reports were drafted on the basis of information collected from competent authorities and open sources, as well as bilateral meetings and workshops with beneficiary institutions and other stakeholders. According to the preliminary conclusions, despite some positive developments the progress made so far remains rather slow and limited. This is *inter alia* due to initial delays unrelated to the PECK Project substance, as a result of which the first assessment cycle started later than originally foreseen, thus shortening the time for the implementation of recommendations, some of which require far-reaching legislative changes.
- In December 2013, the Project launched the second assessment cycle, which will build on the progress report findings and include a broader range of international standards, particularly in the AML/CFT field (FATF recommendations and other international standards not addressed in the first assessment cycle).

The Project contributed to building and/or enhancing the capacities of Kosovo institutions to support and carry out peer assessments based on international monitoring methodologies. It had direct impact albeit so far limited on legislative reforms. The recent amendments to the Law on financing of political entities, the AML/CFT law, as well as the launching of the national AML/CFT risk assessment address some of the assessment recommendations. Some legislative initiatives inspired by the PECK recommendations are currently under parliamentary review. More substantial impact will follow once the remaining recommendations have been implemented.

The Project performance was assessed as excellent by the first result-oriented monitoring carried out in October 2013. The Project received highest marks for all assessed criteria.

Most of the beneficiary institutions actively supported the Project activities. Continued commitment and active cooperation of all beneficiaries will be crucial for the successful roll out of the second assessment cycle and more importantly, implementation of the outstanding recommendations.

In order to give the authorities more time to comply with the recommendations while fully benefitting from the assessment process, a no-cost extension of the Project is proposed from 1 August 2014 to 31 March 2015.

Project data and statistics

No. of activities during 01/02/13-31/01/14	No. of activities during 01/02/12-31/01/14	Total number of planned activities	% of implemented activities	No. of persons involved 01/02/13-31/01/14	No. of persons involved 01/02/12-31/01/14	Level of budgetary expenditure 01/02/12-31/01/14
15	25	39	64%	239 (78% male and 22% female)	532 (77% male and 23% female)	€626,365 out of €1,200,000 (52%)

4 DEVELOPMENTS WITH REGARD TO THE LEGAL AND INSTITUTIONAL FRAMEWORK

This section of the report describes solely the developments with regard to the institutional and legislative framework since February 2013.

The policy, legal and institutional framework to combat economic crime, including corruption, money laundering and terrorism financing in Kosovo has continued to undergo different important reforms in the period under consideration. The findings and recommendations of the PECK project 1st assessment cycle contributed to this process to a certain extent.

Policy developments

The **Anti-Corruption Strategy and Anti-Corruption Action Plan for 2013-2017** initially supposed to be adopted by the Parliament in spring 2012 were considered in plenary session on 21 January 2013 following their revision and approval by the executive. These policy documents were further improved by the relevant parliamentary committees and were finally adopted on 11 February 2013. .

In September 2013, the Ministry of Finance issued Administrative Instruction No. 04/2013 on **National Risk Assessment on Money Laundering and Terrorist Financing** (NRA), laying down the procedures to be followed and the criteria to be observed by Financial Intelligence Unit (FIU) designated to undertake and coordinate with other authorities a national risk assessment every five years. Following this Instruction the FIU conducted the assessment with the aim to identify and evaluate AML/CFT risks and prepared a corresponding report. It contains a detailed analysis and a prioritised list of 35 identified risks, classified into threats and vulnerabilities, as well as an action plan to address them. The report was adopted by the Government in December 2013. Furthermore, based on the NRA the FIU also prepared the **National Strategy and Action Plan for the Prevention of and fight against Informal Economy, Money Laundering, Terrorist Financing and Financial Crimes 2014-2018** which were adopted by the Government on 29 January 2014. Both policy documents will be regularly updated in the light of the NRA mechanism.

Legislative initiatives

A number of key legislative initiatives have been finalised:

- The new Criminal and Criminal Procedure Codes, the Law on Courts and the Law on liability of legal persons for criminal offences entered into force as of 1st January 2013.
- Law No. 04/L-040 on extended powers for confiscation of assets acquired by criminal offence was adopted in February 2013.
- AML/CFT Law (Law No. 04/L-178) and Law No. 03/L-174 on financing of political entities were amended and supplemented in February and July 2013 respectively by a number of new provisions that address some of the recommendations issued by the PECK Project Assessment Team.

- New law on international legal cooperation in criminal matters (Law No. 04/L-213) entered into force in August 2013.
- Draft Laws amending and supplementing Law No. 04/L-051 on prevention of conflict of interest on the exercise of public functions, and Law No. 04/L-050 on declaration, origin and control of assets of high senior public officials were adopted in the first reading in Parliament.

Institutional and organisational developments

The recent developments with regard to the institutional framework and organisational arrangements can be summarised as follows:

- As of 1st January 2013 Kosovo has re-organised its courts service into a streamlined structure that includes Basic Courts, the Court of Appeal and the Supreme Court, and similar levels for prosecution services.
- A Cooperation Agreement on basic principles regarding establishment and functionalization of the National Coordinator for Combating Economic Crime was signed on 22 November 2013 by the Ministry of Justice, Kosovo Prosecutorial Council, Kosovo Judicial Council, Ministry of Finance, Ministry of Internal Affairs, Central Bank of Kosovo, Kosovo Anti-Corruption Agency and Kosovo Intelligence Agency. The aim of this agreement is to increase the efficiency of seizure and confiscation of assets acquired by criminal offence.
- In order to increase the quality of suspicious transaction reports (STRs), the FIU issued Administrative Directive No. 001/2013 on Training for Preventing and Combating Money Laundering and Terrorist Financing according to which the Director of the FIU may request reporting entities to undergo trainings that are related inter alia to their reporting obligations and methods of money laundering and terrorist financing.
- On 31 October 2013, the FIU issued Administrative Instruction No.01/2013 on compiling statistics, reports and recommendations on ML and FT. On 28 January 2014, the FIU and the Minister of Finance issued Administrative Instructions No.03/2014 on procedure for applying administrative sanctions for non-compliance of reporting subjects with the AML/CFT Law and No.04/2014 on politically exposed persons. The FIU is in the process of drafting and finalising secondary legislation and/or guidelines concerning inter alia ways of reporting for construction companies.
- Another development was the official submission of the membership application in Egmont Group by FIU.
- The personnel of the Kosovo Anti-corruption Agency and the Special Prosecution Office have been enhanced by 5 new members each, whereas 10 new staff members were added to the Directorate for Investigation of Economic Crimes within the Kosovo Police.

5 SUMMARY OF PROJECT ACTIVITIES IMPLEMENTED (FEBRUARY 2013 – JANUARY 2014)

During the reporting period the following activities were carried out as foreseen by the project's workplan:

Activity 1: Organise assessment (1 st Cycle) on measures against corruption and AML/CFT	
Action 1.8	Preparation of draft assessment reports (including recommendations) by experts' team and exchange of input with authorities in Kosovo with regard to findings.
Action 1.9	Translation of draft assessment reports
	<p>Following the finalisation of the 1st cycle AC and AML/CFT draft assessment reports by the Assessment Team, the reports were translated into Albanian and submitted to Kosovo authorities on 19 and 21 March 2013 respectively with a request to provide comments and inputs by 10 April 2013 (the English versions were disseminated earlier in mid-February).</p> <p>On 29-30 April 2013, the Project organised a Face-to-Face meeting in Strasbourg between Kosovo authorities and the Assessment Team/Project Team. It brought together 25 representatives of relevant Kosovo institutions, as well as 2 EULEX representatives with the aim to discuss and review the draft reports for both components in light of comments and additional information provided by the beneficiary institutions. The Project ensured the presence of those representatives who were involved in its activities since the inception period. Prior to the meeting all participants were requested to familiarise themselves with both AC and AML/CFT reports, particularly with cross-cutting issues in their areas of responsibility, relevant to both components in order to facilitate efficient discussion and exchange of inputs (<i>inter alia</i> criminalisation/incriminations, law enforcement authorities, investigation and criminal procedure, corporate criminal liability, confiscation, freezing and seizing of proceeds from crime, preventive measures for the financial sector, non-profit organisations, legal persons: beneficial ownership and control information, preventive measures: members of parliament, judges and prosecutors, police, public administration, public procurement, financing of political parties and electoral campaigns, domestic and international cooperation).</p> <p>It is worth mentioning that during the preparation of the draft assessment reports, the Project ensured:</p> <ul style="list-style-type: none"> - Collection of additional information and statistics from beneficiary institutions following the on-site visit and

	<p>discussions held during the Face-to-Face meeting in Strasbourg;</p> <ul style="list-style-type: none"> - Review and finalisation of both draft assessment reports to be discussed and adopted during the Plenary meeting, including thorough proofreading of the Albanian translations; - Coordination and exchange of inputs between the Assessment Team and beneficiary institutions for the both assessment reports.
Activity indicators	<ul style="list-style-type: none"> • Face-to-face meeting with authorities organised; • 1st Draft AC Assessment report available (English & Albanian); • 1st Draft AML/CFT Assessment report available (English & Albanian).
Progress/ deliverables	<p>The 1st cycle draft assessment reports for the AC and AML/CFT components finalised with active involvement of more than 30 institutions in Kosovo to be further discussed and adopted at the Plenary meeting.</p> <p>The two draft assessment reports translated into Albanian.</p>
Action 1.10	Finalization and peer review of the draft assessment reports at Plenary Conference;
Action 1.11	Translation of assessment reports as adopted at Plenary Conference
Action 1.12	Publication of reports by authorities in Kosovo. Visibility event for civil society with participation of media explaining the findings of the assessments
	<p>The assessment reports on Kosovo's compliance with international AC and AML/CFT standards were adopted at the Plenary meeting held in Pristina on 10 June 2013 following a technical discussion and peer review with domestic beneficiary institutions and several interested stakeholders (professional associations, EULEX, etc.).</p> <p>The Plenary meeting was followed by a high-level visibility Conference on 11 June 2013 where outcomes and main findings of the 1st assessment cycle were presented to a wide range of domestic and international stakeholders, civil society and media representatives.</p> <p>Following the Plenary meeting the reports were translated into Serbian, proofread in Albanian and submitted to the authorities in August 2013.</p>

	<p>As regards the publication of the reports, it was decided at the 3rd Steering Committee (SC) meeting (12 June 2013) that the Office for Good Governance Human Rights, Equal Opportunities and Gender Issues (OGG), as the coordinating entity, would take the responsibility to forward officially the reports to the Government in order to obtain due authorisation before the reports can be posted on the website of the Project. However, until the end of October 2013 no official authorisation has been obtained. Therefore, the issue of publication was discussed at the 4th SC meeting (29 October 2013). It was decided to publish the assessment reports on the Project's website, provided the beneficiaries didn't voice any objections within two weeks. Eventually, the reports were published on the Project website at the end of November and beneficiary institutions were encouraged to post them on their respective websites.</p>
Activity indicators	<ul style="list-style-type: none"> • 1st AC and AML/CFT assessment reports available; • Reports published, translated and number of institutions reached; • Number and extent of recommendations implemented.
Progress/ deliverables	<p>The 1st cycle assessment reports for AC and AML/CFT components are available in English, Albanian and Serbian, and have been disseminated to all relevant beneficiary institutions. They contain in-depth analyses of the legal and institutional frameworks, needs for action and recommendations for bringing lasting legislative and institutional reforms. The reports are first of their kind as they have been prepared through a comprehensive and structured assessment process modelled to GRECO and FATF/MONEYVAL methodologies and specifically tailored for Kosovo. They also form a solid basis for streamlining international technical assistance in the economic crime area and can serve as reference for other international assessments. The assessment process involved more than 30 domestic institutions and contributed to building and/or enhancing their capacities to support and carry out peer assessments based on international monitoring methodologies. It also contributed to clarifying competences of various institutions and improving interagency cooperation in the AC and AML/CFT areas.</p> <p>The assessment had direct impact on some legislative reforms and initiatives. Recent amendments to the Law on financing of political entities and the AML/CFT law, elaboration and adoption of respective strategies in the anti-corruption and AML/CFT areas as well as the launching of the national AML/CFT risk assessment address some of the assessment recommendations, thus improving</p>

	compliance with international standards. More substantial impact is expected once the remaining recommendations are implemented.
Action 1.13	Two workshops on best practices and lessons learned with regard to the participation of authorities in Kosovo in the assessment process, including issues of data collection, maintenance and reporting of statistics for assessment purposes.
	The 1 st planned workshop was held in Pristina on 30 October 2013 and focused on lessons learned from the 1 st assessment cycle, as well as progress made in the implementation of the assessment recommendations. About 25 representatives of various beneficiary institutions participated in the workshop and provided information on current developments, recent initiatives and on-going reforms aimed at implementing the assessment recommendations.
Activity indicators	<ul style="list-style-type: none"> • Workshop organised; • Number/extent and professional diversity of people trained to manage and follow up international assessment exercises; • Report summarising discussions and main findings of the workshop available
Progress/ deliverables	<p>The workshop allowed the Kosovo authorities to look back at the 1st cycle assessment and discuss the lessons learned, as well as to update the Project on the progress made in the implementation of the 1st cycle assessment recommendations.</p> <p>A short report summarising discussions and main findings of the workshop was prepared and shared with the Assessment Team. The workshop served as a preliminary step before the launching of the 2nd assessment cycle and contributed to preparation of the draft progress reports. It also contributed to enhancing capacities of the beneficiary institutions to manage and follow up international assessment exercises.</p> <p>The second workshop will be held on 26-27 February 2014 and will focus on good practices of data collection, maintenance and reporting of statistics for assessment purposes.</p>

Action 1.14	Organise an interagency workshop for authorities in Kosovo to ensure a unified understanding of the proposed reforms
	<p>The interagency workshop was held in Pristina on 3-4 December 2013. Its main purpose was to present and discuss with representatives of the beneficiary institutions preliminary draft reports on progress made in the implementation of the recommendations from the 1st assessment cycle, and to ensure a unified understanding of the proposed reforms. The Assessment Team presented preliminary findings of the draft progress reports focusing on areas in need of action and measures to be taken to implement the assessment recommendations.</p> <p>The workshop also served for the official launching of the 2nd assessment cycle. Detailed information on this issue is provided under Activity 3 below.</p>
Activity indicators	<ul style="list-style-type: none"> • Interagency workshop organised; • Number/extent of beneficiary institutions and experts involved; • Unified understanding of the proposed reforms ensured.
Progress/ deliverables	The workshop brought together 43 representatives of various beneficiary institutions and allowed for an exchange on the draft progress reports with the Assessment Team. It contributed to the unified understanding of the proposed reforms.
Action 1.17	Overall support to Kosovo authorities in implementation of recommendations from the assessment report
	The Project held regular bilateral meetings and organised two workshops (see above Actions 1.13 and 1.14) aimed at discussing and providing guidance on measures to be taken by the authorities to implement the assessment recommendations. Furthermore, at the request of the Kosovo Anti-Corruption Agency, the Project prepared Advisory Paper on the draft amendments to the law on conflict of interests in discharge of public functions.
Indicators	<ul style="list-style-type: none"> • Bilateral meetings held • 2 Workshops organised • Advisory Paper prepared

Progress/deliverables	<p>Overall support to Kosovo authorities in implementation of the assessment recommendations ensured through regular bilateral meetings between the Project Team and beneficiary institutions and two workshops.</p> <p>Advisory Paper on the draft amendments to the law on conflict of interests in discharge of public functions submitted to the KAA and is expected to contribute to bringing the law in line with international standards.</p>
Activity 2: Preparation of progress reports on the measures taken by Kosovo authorities to implement recommendations of the 1 st assessment cycle.	
Action 2.1	Collection of information, including various EU reports (progress report, visa liberalisation roadmap, stabilisation and association agreement) necessary for the preparation of Progress report by Experts' team – including preparation of progress report template and submission to Kosovo authorities.
Action 2.2	Drafting of progress reports by Experts' team
Action 2.3	Finalisation and translation of Report, publication
	<p>Following the decision of the 4th Steering Committee meeting the methodology of progress report preparation has been slightly adjusted in view of various similar reporting obligations of Kosovo authorities vis-à-vis other processes (visa liberalisation roadmap, stabilisation and association process, AML/CFT risk assessment, etc.). Namely, contrary to standard GRECO and MONEVAL practice requiring countries to submit reports on measures taken to implement recommendations, it was the Project that initially took lead in this process. The Project Team designed progress report templates and started collecting information/data necessary for the drafting of the progress reports by the Assessment Team. Institutions were requested to provide relevant information (recent legislative initiatives, reports, action plans, statistics, etc.) and encouraged to report on measures taken to implement the recommendations from the 1st assessment cycle by completing the progress report templates. In addition, the Project collected information from open sources, including EU Progress Report on Kosovo.</p> <p>In the course of November 2013, the Assessment Team analysed the collected information/data (including information provided during the workshop on 30 October 2013, Action 1.13) and formulated requests for additional information.</p>

	<p>Competent authorities were encouraged to provide not only recently adopted legislation, legal initiatives, reports, action plans, etc. but also analysis of undertaken measures. The Project Team has also continued to ensure translation of collected information, as necessary.</p> <p>The draft progress reports prepared by the Assessment Team were presented and discussed with Kosovo authorities during the interagency workshop held in Pristina on 3-4 December 2013 (see Action 1.14 above) focusing on measures taken and areas in need of action. Based on preliminary findings, the Assessment Team concluded that despite some positive developments the progress made so far remains rather limited and further substantial actions are required to address the 1st assessment cycle recommendations. This is partly due to a short period of time available between the adoption of the assessment reports (June 2013) and preparation of progress reports. In view of this and in line with the agreement reached at the 4th SC meeting, it was decided to reschedule the finalisation of the progress reports until beginning of 2014. This would give the authorities more time to provide comments and additional information on the draft reports.</p> <p>Following the workshop the draft reports were further edited and translated into Albanian. On 20 December 2013, the Project sent both reports and indicative lists of beneficiary institutions concerned to its main partners - KAA and FIU - with a request to disseminate them to all relevant institutions for written comments and additional information on measures taken/planned to be taken vis-à-vis the PECK 1st assessment recommendations. The deadline for submission of comments was set for 24 January 2014.</p> <p>The December workshop and preliminary findings of the draft progress reports confirmed the necessity for extending the Project with no cost (as already discussed at the 4th SC meeting) and revising the Project workplan particularly in respect of the 2nd assessment cycle. This would allow Kosovo authorities to take necessary measures to demonstrate real progress, and to meaningfully participate in and fully benefit from the assessment process.</p>
Activity indicators	<ul style="list-style-type: none"> • Draft Progress reports for AC and AML/CFT components prepared and discussed with beneficiary institutions; • Amount and quality of data and information produced by Kosovo institutions;

	<ul style="list-style-type: none"> Support the Kosovo institutions in developing mechanisms for collecting and processing data necessary for the reporting on AC and AML/CFT measures/reforms.
Progress/ deliverables	<p>AC and AML/CFT draft progress reports submitted to Kosovo authorities in English and Albanian for comments.</p> <p>The amount and quality of data and information provided by the authorities on the draft progress reports were rather poor, therefore the deadline for submission of comments was extended until 14 February 2014. Furthermore, the Project Team held several bilateral meetings to remind institutions of the agreed deadline and to further explain reporting obligations. The Project will continue to support the Kosovo institutions in developing mechanisms for collecting and processing data necessary for the reporting on AC and AML/CFT measures.</p> <p>The draft reports will be finalised at the beginning of 2014 upon receipt of comments and additional information from the Kosovo authorities. The Albanian translation will be adjusted accordingly. The reports will be also translated into Serbian and published in three languages with the agreement of the authorities.</p> <p>The reports will serve as benchmarks for re-assessing and updating the level of compliance with AC and AML/CFT international standards in the 2nd assessment cycle.</p>
Activity 3: Organise assessment (2 nd Cycle) on measures against corruption and AML/CFT	
Action 3.1	Prepare 2 nd assessment cycle AC and AML/CFT Questionnaire/Compliance Matrix based on results and risks identified in the course of the 1 st assessment cycle;
Action 3.2	Translation of the AC and AML/CFT Questionnaire/Compliance Matrix into Albanian and Serbian;
Action 3.3	Dissemination of AC and AML/CFT Questionnaire/Compliance Matrix to each respective and relevant authority in Kosovo.
	In October 2013, the Project designed AML/CFT Questionnaire for the 2 nd assessment cycle to assess compliance of Kosovo's AML/CFT legal and institutional framework with FAFT recommendations and other international standards not addressed in the 1 st assessment cycle. This mainly concerns preventive measures for financial institutions and designated non-financial businesses and professions (DNFBPs), legal

	<p>arrangements and international cooperation. The draft questionnaire was presented at the 4th Project SC meeting on 29 October 2013.</p> <p>The Project also prepared the AC Compliance Matrix in three languages which will be completed by the Assessment Team to mark the progress made by the Kosovo authorities in the AC area and will be appended to the progress report. It will be used as benchmark for re-assessing the level of compliance with international AC standards during the 2nd assessment cycle and will be updated accordingly at the end of the assessment.</p> <p>The AML/CFT Questionnaire and AC Compliance Matrix were presented and explained at the interagency workshop on 4 December (Action 1.14 above) which marked the official launching of the 2nd assessment cycle. Furthermore, the Project Team explained the implementation modalities of the 2nd cycle. Namely, for the AC component it will consist of reviewing the level of compliance with international AC standards on the basis of progress report findings and updating the AC compliance matrix. For the AML/CFT component, it will consist of re-examining the level of compliance with the 1st cycle recommendations based on the progress report findings and updating ratings, as well as assessing compliance with FATF recommendations and other international standards not addressed in the 1st cycle in order to complete a full assessment cycle.</p> <p>Following the interagency workshop, the AML/CFT Questionnaire was slightly revised to include selected questions related to the third EU Directive 2005/60/EC on Money Laundering as well as FATF recommendations 36 (already examined in the 1st cycle) and 38 on international cooperation in order to have a comprehensive and coherent review of this issue.</p> <p>The finalised AML/CFT 2nd cycle Questionnaire in three languages was sent to Kosovo authorities through the Financial Intelligence Unit on 16 December 2013 with a request to provide replies by 31 January 2014.</p>
Activity indicators	<ul style="list-style-type: none"> • AML/CFT Questionnaire designed, translated and disseminated to authorities in English, Albanian and Serbian • AC Compliance matrix disseminated to authorities in English, Albanian and Serbian

Progress/ deliverables	<p>The 2nd cycle AML/CFT Questionnaire and the AC Compliance Matrix in English, Albanian and Serbian submitted to Kosovo authorities.</p> <p>The replies to the AML/CFT questionnaire will be translated into English and analysed by the Assessment Team. Further questions and requests for additional information may be formulated by the Assessment Team prior to and during the on-site visit.</p>
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6 PROJECT STEERING COMMITTEE MEETINGS

During the reporting period, the Project held three Steering Committee meetings:

The aim of the 2nd SC meeting (21 February 2013) was to discuss and adopt the PECK 1st Annual Progress Report, briefly introduce the two draft assessment reports prepared by Assessment Team, as well as adopt the adjusted assessment schedule;

The 3rd SC meeting (12 June 2013) discussed the issue of publication of the assessment reports and approved the proposed updates to the Project workplan.

The aim of the 4th SC meeting was to discuss and adopt proposed changes to the workplan, implementation modalities and schedule of the 2nd assessment cycle, including progress report preparation, publication of the 1st cycle assessment reports and possible no-cost extension of the Project.

Main conclusions of the 4th SC meeting:

- Amendments to the workplan and methodology of the progress report preparation were adopted;
- Possible no-cost extension of the Project was met with the approval of the SC members. The extension and corresponding revised schedule of 2nd assessment cycle will be discussed and confirmed after the workshop in December, in light of the findings of the draft progress reports;
- The 1st assessment reports will be published on the PECK Project website two weeks after the local elections provided there are no objections from the beneficiaries.

Detailed minutes of the SC meetings are appended to this report.

7 PROPOSED NO-COST EXTENSION OF THE PROJECT

As already outlined above, the possibility for a no-cost extension of the Project was discussed at the 4th Steering Committee meeting and confirmed by the end of 2013 in light of the following reasoning:

- Initial delays beyond the Project's control¹ resulted in shortening the period for the implementation of the assessment recommendations following the official adoption of the assessment reports;
- The need to further combine Project's deliverables with the standard GRECO and MONEYVAL practices in allowing at least 12 months since the adoption of the assessment reports to take necessary measures to implement the assessment recommendations. Although it is difficult to replicate this practice exactly for many reasons, certain options could be found to address this issue;
- The slow progress made by the authorities to address the 1st assessment cycle recommendations that is *inter alia* due to short period of time between the adoption of the assessment reports and preparation of progress reports: about 6 months in contrast to a general practice of 18 months;
- Limited human resources in beneficiary institutions as well as limited absorption capacity of institutions to coordinate and participate in various processes led by different international counterparts;
- The confirmation from core beneficiaries of the need to allow additional time for implementing the recommendations as emphasised also at the 4th project Steering Committee meeting.

In view of the above, a no-cost extension of the Project from 1 August 2014 until 31 March 2015 would allow for the 2nd assessment cycle to be carried out in a more efficient and flexible way and would give Kosovo authorities more time to ascertain and demonstrate progress, consolidate achieved results and fully benefit from the assessment process.

Furthermore, following preliminary consultations with the EUOK and main beneficiaries, it is proposed to add activities aimed at assisting some of core beneficiary institutions in addressing certain recommendations deriving from the 1st assessment cycle and more specifically, those related to the AML/CFT area in amending the AML/CFT law.

Main beneficiary institutions have been consulted and are supportive of the proposed workplan and the revised 2nd cycle assessment schedule. These documents will be discussed and officially approved by the Project SC at its next meeting tentatively planned in April 2014.

¹ Delays were related to denomination of Kosovo to be used in the footnote on Project-related documents.

8 COOPERATION WITH STAKEHOLDERS

8.1 Counterpart beneficiaries

The PECK Project has excellent working relations with its stakeholders. The two coordinating institutions for the AC and AML/CFT assessment components – the KAA and the FIU – demonstrated a proactive role in the assessment process, particularly in the highly resource-intensive phase that included the dissemination to and collection from a wide range of authorities in Kosovo of requests for additional information, draft reports in different stages of their elaboration, the AML/CFT Questionnaire and AC Compliance Matrix and other deliverables.

Most authorities in Kosovo demonstrated efforts towards providing the Project with the necessary information during post-on-site phase. Unfortunately, there were several authorities whose engagement was not always satisfactory, namely the Ministry of Internal Affairs or the Ministry of Public Administration. Furthermore, Ministry of Finance continued to be absent and unavailable for the majority of meetings and events organised during the reporting period.

8.2 Other third parties

The Project continued to efficiently cooperate with EULEX which provided valuable inputs to the preparation of the assessment reports. EULEX representatives actively participated in all Project activities organised during the reporting period.

Regular coordination meetings have also been held with the U.S. Treasury resident advisor in Pristina, who is providing assistance to Kosovo authorities in the AML/CFT area, and the teams of the EU funded Projects on “Support to Kosovo Institutions for Combating Financial and Economic Crimes” and “Support to the Agency for Managing of Seized and Confiscated Assets” to exchange information and avoid overlapping between these projects.

9 EVALUATION AND MONITORING

The first Result Oriented Monitoring (ROM) aimed at providing external, objective and impartial feedback on the performance of the project was carried out in October 2013.

As foreseen by its methodology, ROM assessed several areas of the PECK Project and marked it with quintuple A's for relevance and quality of design, efficiency of implementation to date, effectiveness to date, impact prospects and potential sustainability (marking is done on a scale from A to D with A being the highest mark and D the lowest).

ROM key observations:

“The project fully meets its expectation. To date, the PECK project has been successful in preparing and launching the AC and AML/CFT assessments of Kosovo. This was achieved based on a combination of activities carried out by the project, and specifically the successful establishment of the

project and expert teams, the development of a methodological framework for the assessment jointly with local beneficiaries, and thorough training, guidance and consulting of project counterparts in Kosovo on the conduct of the assessment. The project has also been successful in the establishment of productive working relations and coordination with other international stakeholders in Kosovo."

10 PROJECT RESULTS AND ACHIEVEMENTS

Achievements per expected result during the reporting period are evaluated in the paragraphs below. Since the assessment under the AC and AML/CFT components is carried out as a single unified process the results under the sub-items for ER 1 and ER 2 are the same.

Result 1 – Assessment of anti-corruption measures	Result 2 - Assessment of anti-money laundering and combating financing of terrorism measures
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1.1 / 2.1 Assessment and progress reports available on the level of compliance of applicable regulations and practices with European standards (based on the experience and criteria used by GRECO / MONEYVAL and other relevant international bodies);

Two assessment reports on compliance with international standards in the AC and AML/CFT fields have been prepared through a comprehensive and structured assessment modelled to GRECO and FATF/MONEYVAL methodologies and specifically tailored to Kosovo. The reports contain in-depth analyses of AC and AML/CFT frameworks and identified deficiencies, and provide recommendations for bringing lasting legislative and organisational reforms to improve compliance with international standards.

The reports on progress made in implementing the assessment recommendations have been drafted and discussed with Kosovo authorities and are expected to be finalised in March 2014.

1.2 / 2.2 Kosovo institutions capable to support and carry out peer assessments on anti-corruption / anti-money laundering and combating the financing of terrorism measures based on European monitoring methodology;

Kosovo authorities have been provided with guidance through periodic bilateral meetings and consultations with the PECK Project Advisor, as well as workshops on good practices and lessons learned from the assessment process. With the assistance of the PECK Project authorities have acquired the knowledge and experience of participating in international assessment and have generally demonstrated adequate capacities in this regard.

1.3 / 2.3 Recommendations available on regulatory, institutional, and policy-related areas;

Recommendations on the policy-related areas, regulatory and institutional framework in the AC and AML/CFT fields have been finalised and submitted to Kosovo authorities with prior discussion which took place in several stages in accordance with the assessment schedule.

1.4 / 2.4 Assessment and progress reports (incl. compliance matrix) are published and disseminated in English, Albanian and Serbian.

The main findings of the 1st assessment cycle were presented to a wide range of domestic and international stakeholders, civil society and media representatives at the High-Level Visibility Conference (11 June 2013). The assessment reports in English, Albanian and Serbian were published on the Project's website in November 2013 and all beneficiary institutions were encouraged to publish them in their respective websites. At the time of reporting, only the Central Election Commission has ensured the publication of the reports. (<http://www.kqz-ks.org/sq/projekti-i-unionit-europiane-dhe-keshillit-te-europes-kunder-krimet-ekonomik-ne-kosove>)

The progress reports are being finalised and will be published with the agreement of the authorities.

11 VISIBILITY

Project news, events and outputs/deliverables are regularly reported on the Council of Europe Economic Crime Cooperation Unit's website (www.coe.int/corruption), and the section exclusively dedicated to the PECK project: www.coe.int/peck

The Project ensures the visibility of the EU's contribution at all stages of its activities. The Council of Europe is taking all appropriate measures to publicise the fact that the Project funding is being received from a European Union agreement. All Project related documents and deliverables acknowledge that actions have been carried out "with funding from the European Union" by also displaying in an appropriate way the European Union logo. Furthermore, notepads, pens, bags, USB keys and folders with the Project title and logo were regularly distributed during the activities and Project banner was displayed in conference rooms.

It has to be noted that the High-Level Visibility event to present the findings of the 1st assessment cycle was widely reported in the local media and substantially contributed to the Project's visibility.

The project will continue to pay special attention to the visibility of its actions and results.

Screenshot of the Project website



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PECK-Kosovo* - Project against Economic Crime

*This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

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PROJECT DOCUMENTATION & DELIVERIES

- Project Summary
 - [English/Albanian/Serbian](#)
- Description of Action (DoA)
 - [English/Albanian/Serbian](#)
- Technical Papers
 - [English/Albanian/Serbian](#)

ASSESSMENTS

- Terms of Reference on the Assessment procedure
 - [English/Albanian/Serbian](#)
- Cycle I:
 - Assessment Report (AC)
 - [English/Albanian/Serbian](#)
 - Assessment Report (AML/CFT)
 - [English/Albanian/Serbian](#)

QUESTIONNAIRES

- Cycle I:
 - Questionnaire (AC)
 - [English/Albanian/Serbian](#)
 - Summary of Questionnaire (AC)
 - [English/Albanian/Serbian](#)
 - Questionnaire (AML/CFT)
 - [English/Albanian/Serbian](#)
 - Summary of Questionnaire (AML/CFT)
 - [English/Albanian/Serbian](#)
- Cycle II:
 - Questionnaire (AML/CFT)
 - [English/Albanian/Serbian](#)

WORKPLAN/SCHEDULE

- Workplan
 - [English/Albanian/Serbian](#)
- Assessment Schedule
 - [English/Albanian/Serbian](#)

REPORT / REFERENCES

- Inception Report
 - [English/Albanian/Serbian](#)
- Monthly Reports
 - [English/Albanian/Serbian](#)

PHOTO GALLERY

- [2014](#)
- [2013](#)
- [2012](#)

Corruption remains a serious challenge for Kosovo*. According to a number of surveys conducted by national and international organizations, control of corruption has proved to be scarce. In the field of money laundering and terrorism financing, recent assessments have also shown that there is a need for continuous legislative and organizational reforms to bring Kosovo* in line with European and international standards. While reforms related to corruption and money laundering have been underway for several years, there has been no structured, longer-term process to assess the progress and impact achieved up to date and highlight short-medium and long term reform steps. In view of this and while acknowledging the need of a structured and unified assessment process in Kosovo* and in these areas (Anti-corruption and Anti-Money Laundering and Countering of Terrorist Financing based on international/regional standards and practices as well as the successful experience of previous interventions of the Council of Europe carried out in Kosovo*, a project to address actions as such was designed in cooperation with counterpart institutions in Kosovo* and European Union Office in Pristina. As a result an IPA 2012 Contribution Agreement as a Joint Programme was signed in January 2012 between the Council of Europe and the European Union Office in Pristina. The PECK Project started on 1 February 2012, with a duration of 30 months and a budget of 1,200,000 Euro (EU funds: 83.3% and CoE funds: 16.7%). The Project's overall objective is to contribute to the democracy and the rule of law through the prevention and control of corruption; money laundering; and the financing of terrorism in Kosovo*. The Project's purpose is to strengthen institutional capacities to counter corruption; money laundering; and the financing of terrorism in Kosovo* in accordance with European standards through assessments and recommendations for improving and streamlining reforms to combat economic crime. The Office of Good Governance (OGG), the Kosovo* Anti-Corruption Agency (KAA), and the Financial Intelligence Centre (FIC), are the main counterpart institutions for this Project.

NEWS...

Coming up soon:

On-site visit of the PECK Assessment Team to Kosovo* (Pristina, 14-18 April 2014)

The second on-site visit to assess the anti-corruption (AC) and anti-money laundering/combating the financing of terrorism (AML/CFT) frameworks will take place in Pristina from 14 to 18 April 2014. The main purpose of the on-site visit is to conduct interviews with a wide range of authorities in order to verify and cross-examine replies provided to the AML/CFT 2nd cycle Questionnaire, as well as to collect additional information on the implementation of the 1st cycle recommendations for both AC and AML/CFT components. The information

12 DIFFICULTIES ENCOUNTERED DURING IMPLEMENTATION

With the exception of initial delays at the beginning of the Project related to the footnote to be used when referring to “Kosovo” in documents of Joint Projects with the EU (see also the PECK first annual Progress Report on this issue), no major difficulties were encountered that could compromise progress of Project implementation and achievement of the expected results. However, as mentioned above (section 7) due to these delays Kosovo authorities had less time to implement the assessment recommendation and demonstrate real progress. The proposed no-cost extension of the Project is considered to address this problem.

13 POTENTIAL RISKS

The political risk involved in this Project is not considered to be high at the time of reporting. However, it is advised to also keep track of the current context and the main risks, previously identified in the project’s Description of Action and Inception report.

- Upcoming general elections

The organisation of general elections in Kosovo (expected to be held around September 2014 unless an anticipated date is defined) may to a certain extent delay or slow down the implementation of necessary measures and/or ongoing initiatives by the authorities. This risk can be mitigated by the requested no-cost extension of the Project. In addition, electoral process may create a certain impetus and favourable momentum for carrying out needed reforms.

- Lack of political stability

Changes among key policymakers in the areas of AML/CFT and AC could to an extent impact Project implementation. In January 2013 the Minister of Finance, who is generally responsible for AML/CFT policy and legislative development resigned and took office of the Governor of Kosovo Central Bank on 26 March 2013. This has so far not led to any consequences impacting the Project or any of its activities.

- Lack of co-ordination and co-operative approach by stakeholders

The implementation of the 1st phase of the assessment has demonstrated that the main local counterparts cooperate fully and efficiently within the PECK project, particularly the two coordinating agencies – KAA and FIU. There have been instances where several other stakeholders have failed to demonstrate the necessary cooperation; however this has generally not led to any significant infringement of quality in Project deliverables or activities.

- Lack of financial resources on the part of the beneficiary to consolidate achievements of the project

The main focus of the Project is on the assessment of necessary legislative, policy and institutional reforms, and hence, the expected results do not require substantial investments by the beneficiary, rather than maintain the sustainable budgetary resources as allocated to the institutions in charge of operating under the improved policy/institutional and legislative reforms. Furthermore, all institutions co-operating with and benefiting from the projects are established and operational.

- Risk of duplication

The Project has regular exchanges and coordination meetings with the two EU-funded projects and other international stakeholders active in the economic crime field in order to avoid possible duplication of activities/deliverables.

The PECK Project Team has become aware of the upcoming financial sector assessment of Kosovo by the IMF and World Bank, which would include an AML/CFT evaluation exercise in accordance with the FATF methodology under the Financial Sector Assessment Program (FSAP). Undertaking such an exercise would create the risk of duplication of deliverables as well as place an excessive and unnecessary resource burden on the Kosovo authorities. Therefore, the relevant Kosovo counterparts requested the World Bank to postpone this evaluation exercise to a later stage in view of the ongoing PECK Project assessment. In this regard, the Project remains committed to keep consultations with the World Bank and IMF in order to ensure that any evaluation or/and assessment carried out by these organisations does not duplicate work already undertaken by the Project and Kosovo authorities.

14 CONCLUSIONS

The PECK Project has been successful in finalising the first cycle assessment of Kosovo's compliance with AC and AML/CFT standards and launching of the second assessment cycle, and made substantial progress in achieving its main expected results. The two assessment reports produced by the Project are first of their kind as they have been prepared through a comprehensive and structured assessment process modelled to GRECO and FATF/MONEYVAL methodologies and specifically tailored for Kosovo. They contain in-depth analyses of the legal and institutional frameworks, needs for action and recommendations for streamlining reform process in economic crime area. Some of the recent legislative reforms and initiatives were triggered by the assessment recommendations.

The Project activities contributed to building and/or enhancing capacities of Kosovo institutions to support and carry out peer assessments based on international monitoring methodologies.

In the next reporting period the Project will focus on finalising the progress reports and conducting the second assessment cycle with the aim to prepare final assessment reports on Kosovo's compliance with international standards in AC and AML/CFT areas.

It should be underlined, that continued commitment and active cooperation of all beneficiaries will be crucial for the successful roll out of the second assessment cycle and implementation of the outstanding recommendations. In this respect, a no-cost extension of the Project is recommendable to efficiently conduct the second assessment cycle, better consolidate achieved results and most importantly, to give the authorities more time to comply with the recommendations and fully benefit from the assessment process.

Name of the contact person for the Action: Ivan Koedjikov

Signature: 

Date: 31/03/14

15 LIST OF ANNEXES

- Annex I: Minutes of the 2nd Steering Committee meeting, 21 February 2013
- Annex II: Agenda of the Face-to-Face Meeting in Strasbourg, 29-30 April 2013
- Annex III: Agenda of the Plenary Meeting on the adoption of AC and AML/CFT assessment reports, 10 June 2013
- Annex IV: Agenda of the Conference on presentation of the outcomes of AC and AML/CFT assessment reports, 11 June 2013
- Annex V: AC and AML/CFT assessment reports
- Annex VI: Minutes of the 3rd Steering Committee meeting, 12 June 2013
- Annex VII: Minutes of the 4th Steering Committee meeting, 29 October 2013
- Annex VIII: Agenda of the Workshop on Best Practices and Lessons Learned, 30 October 2013
- Annex IX: Report summarising main findings of the Workshop on Best Practices and Lessons Learned (30 October 2013)
- Annex X: Agenda of the Interagency Workshop on progress made by the Kosovo authorities in the implementation of the recommendations from the 1st assessment cycle and launching of the 2nd assessment cycle, 3-4 December 2013
- Annex XI: AML/CFT 2nd Cycle Questionnaire and AC Compliance Matrix
- Annex XII: Advisory Paper on the draft amendments to the law on conflict of interests in discharge of public functions submitted to the KAA
- Annex XIII: Proposed Project workplan for the no-cost extension until 31 March 2015
- Annex XIV: Revised 2nd cycle assessment schedule