

ACTIVITY REPORT 2020





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PREFACE

As a specialized body in the prevention and combating of acts of corruption, those related to corruption and corruptible deeds, the Center, together with the internal actions undertaken in the process of regional and international cooperation, constantly promotes and consequently strengthens the image of our country both internally, as well as externally.

Thus, during the reporting period, the Center carried out its activity in accordance with the Action Plan for 2020, approved by the Decision of the College Board of 31.01.2020.

The Center activity was focused on the efficient implementation of the institutional attributions provided for in article 4 of Law no.1104 of 06.06.2002 *regarding the National Anticorruption Center*:

- preventing, detecting, investigating and curbing corruption offenses and offenses related to corruption, as well as acts of corruption;
- carrying out the anti-corruption expertise of the draft legislative acts and the draft normative acts of the Government, as well as of other legislative initiatives presented in Parliament, in order to comply with the state's policy of preventing and combating corruption;
- carrying out the operational and strategic analysis of corruption acts, acts related to corruption and facts of corruption behavior, information on analytical studies of the phenomenon of corruption.
- carrying out the assessment of institutional integrity under the conditions of Law no.325 of 23.12.2013 *on the assessment of institutional integrity*, monitoring the implementation of integrity plans and assessing the progress made;
- recovery of criminal assets.

In order to effectively carry out its mission and duties according to its competence, the NAC focuses on cooperation with other national public institutions, organizations and similar authorities from other countries, and to this end, signs bilateral agreements, promoting the exchange of information and experiences in the field of prevention and combating corruption, access to databases for carrying out operational, financial, patrimonial analyses that could help prevent, detect and investigate corruption offenses.



In this context, we must mention the initiative of various state institutions to conclude collaboration agreements, aimed at obtaining support of the Center in preventing and combatting corruption.

Thus, during 2020, the National Anticorruption Center concluded agreements/additional protocols with: the Ministry of Education, Culture and Research, the Ministry of Finance, the Public Property Agency, the National Agency for Energy Regulation, the Money Laundering Prevention and Combating Service, the Stefan cel Mare Police Academy, the Technical University of Moldova, the Public Services Agency, the AO International Institute of Generations XXL, the Chisinau City Hall, the State Tax Service. Following the conclusion of the agreements, the staff of the Center obtained access to more information, which facilitates the activity of the institution, and by unifying efforts will ensure the prevention and combating of this scourge.

Within the activities carried out by the international anticorruption authorities, the Center has succeeded to present itself through its activity of monitoring, analyzing and evaluating traced objectives, institutional and professional integrity, becoming one of the first authorities from the Republic of Moldova that constantly promotes these priorities.

Thus, the Republic of Moldova (represented by the NAC in various forums) cooperates effectively with international organizations, systematically informing them about the actions of preventing and combating corruption.

In this context, considering the technical assistance projects in which the NAC is beneficiary a series of recommendations have been developed by international experts on the adjustment of the legislative and institutional framework to European standards, recommendations that have been transposed into a series of normative documents and relevant policy documents that ensure the strengthening of effective and qualitative tools in the process of preventing and combating corruption.

As a result, the Parliament has adopted through its Decision no.56 of 30.03.2017, the National Integrity and Anticorruption Strategy (NIAS) for the years 2017-2020. This policy document incorporates 8 pillars on which the National Integrity System is based and which covers the actions of the whole society – from the Parliament to civil society and the media, the latter

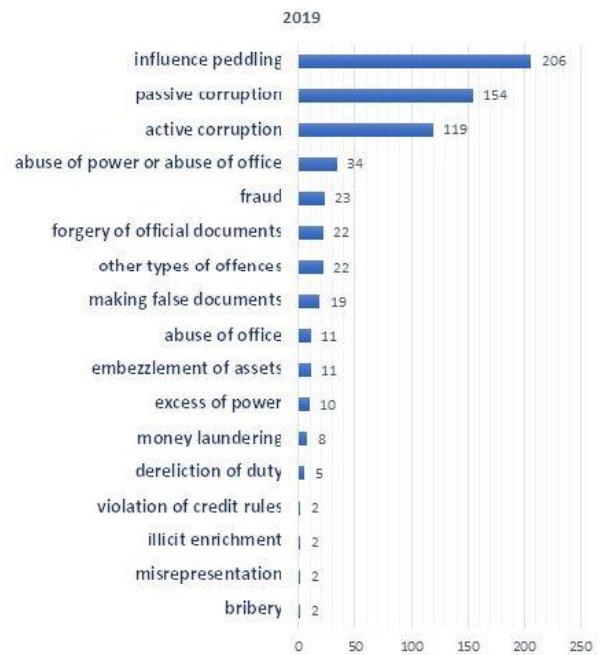
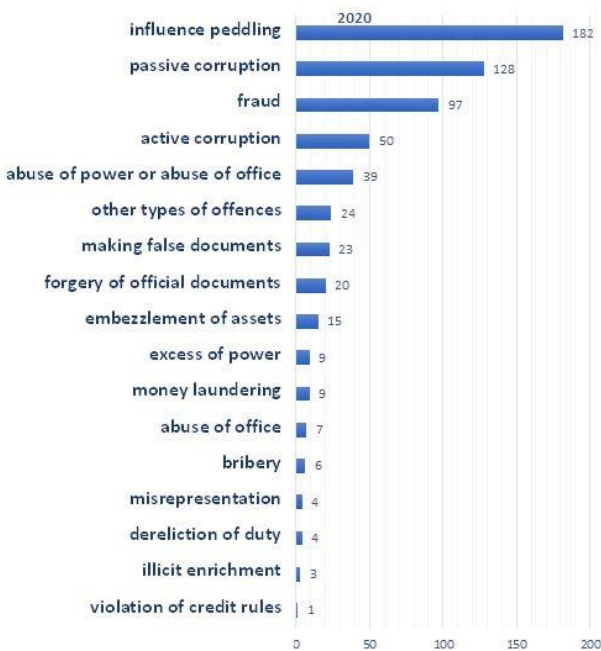


having a very important role, contributing to the effective implementation of the Strategy through independent and impartial monitoring, but also by equidistant information on the deficiencies of the system.

The need to monitor the implementation of the policy document at the national level has led to the establishment of the three Monitoring Groups of the Strategy, incorporating the entities that are responsible for its implementation. Their activity is assisted by the Secretariat of the monitoring groups within the Center, which drafts the monitoring and evaluation reports, published on the institution’s website.

COMBATING CORRUPTION

During the evaluated period, the results obtained by the Center’s investigation officers are the following: 621 detected offenses (General Directorate on Combating Corruption – 292, Territorial Directorate Center – 150, General Territorial Directorate North - 138, General Territorial Directorate South - 41), of which: corruption and corruption related offenses - 449 and other categories - 172. Taking into account the fact that at the basis of the operative investigation activity is a complex of measures for discovering and curbing the offenses and persons who commit them, we mention that out of the total of discovered offenses - 463 is the result of processing operative information received by investigation officers.



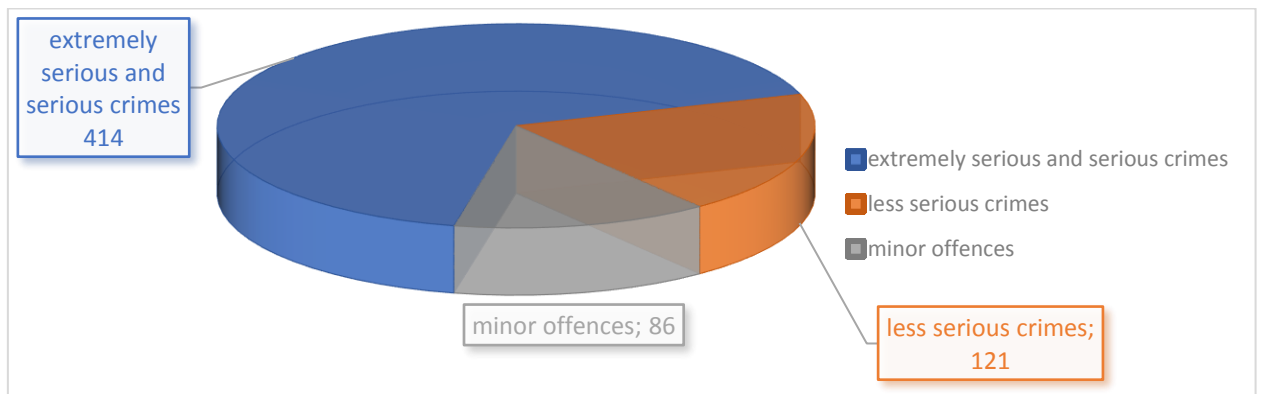


Following an analysis of the detected offenses, the most frequently committed corruption and related acts were:

- influence peddling - 182 offenses;
- passive corruption - 128 offenses;
- scam - 97 offenses;
- active corruption - 50 offenses.

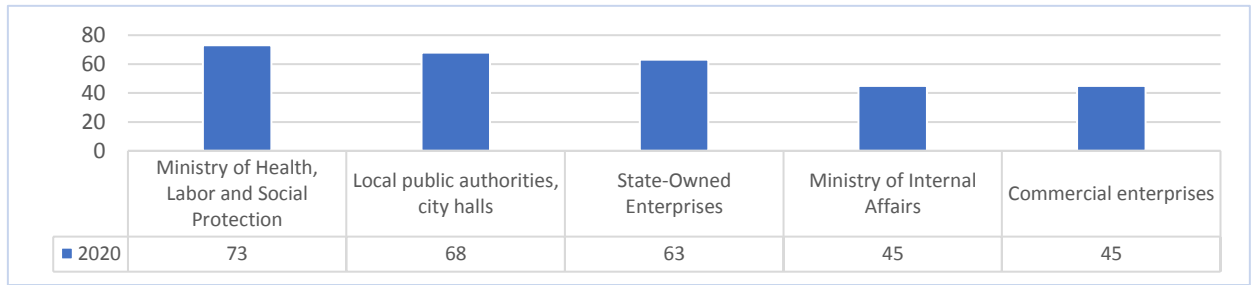
Also, during the reporting period, following the special investigative measures and criminal prosecution, 66 actions of detaining the perpetrator in flagrante delicto were carried out.

Depending on the nature and the extent of the damage, the detected offenses are divided in the following way: 20 - extremely serious, 394 - serious, 121 - less serious and 86 - mild.



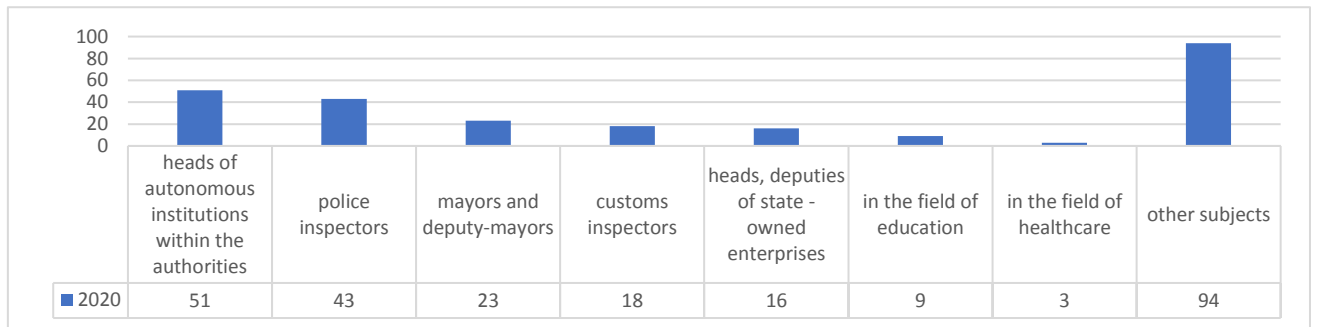
Also, during the year 2020, the most frequent cases of corruption were found in public institutions within:

- Ministry of Health, Labor and Social Protection – 73 cases;
- Local public authorities, city halls – 68
- State-Owned Enterprises - 63 cases;
- Ministry of Internal Affairs – 45 cases;
- Commercial enterprises – 45 cases.



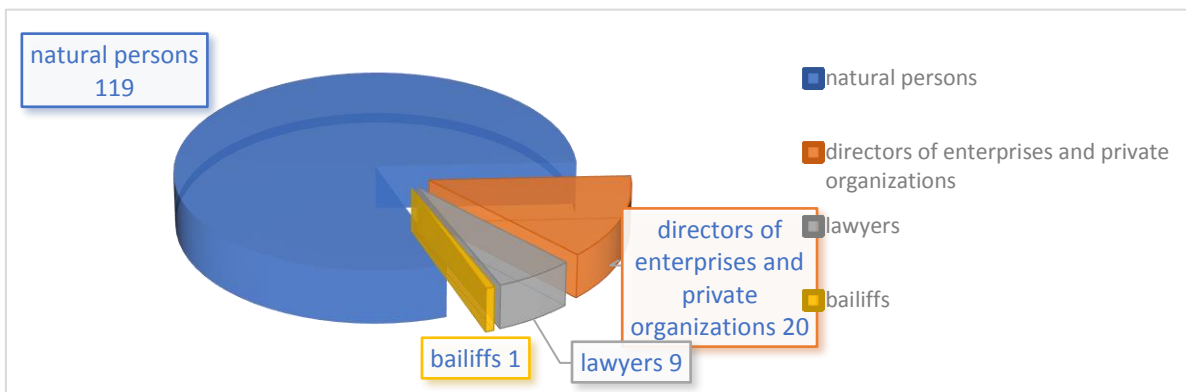
In 2020, for committing of corruption and related crimes, the following civil servants have been identified and subjected to criminal investigation by the Center:

- heads of autonomous institutions within the authorities - 51
- police inspectors – 43
- mayors and deputy-mayors – 23
- customs inspectors – 18
- heads, deputies of state - owned enterprises – 16
- in the field of education - 9
- in the field of healthcare – 3
- other subjects – 94.



In the private and freelance sectors 149 persons have been targeted, including:

- individuals – 119;
- directors of enterprises and private organizations - 20;
- lawyers - 9;
- bailiffs – 1.



Thus, we mention that as a result of the efforts made, it was possible to detect and investigate corruption schemes, as well as to send the criminal cases to the Anticorruption Prosecutor's Office with a proposal for referral to justice. In this context we mention:

- Investigation of a criminal scheme initiated by the employees of the National Council for Determining Disability and Work Capacity (CNDDCM) together with the members of the territorial structure of the Council. Following the criminal prosecution actions, it was found that they had claimed money from persons who would have lost their temporary or permanent work capacity in order to draw up a set of documents to grant them the degree of disability. The gathered materials show that the experts asked money for allegedly bribing the employees involved in the process of granting the disability degree, starting with diagnosing disabilities ending with issuing final certificate. The requested amounts ranged between 250 and 600 euros, depending on the degree of disability, and for a “degree of disability for life”, the alleged bribe reached up to several thousands of lei.

Around 50 episodes of passive and active corruption, as well as influence peddling were identified during investigations, committed by the employees of the National Council for Determining Disability and Work Capacity and by some public officials from Rezina Territorial Service.

- Investigation of the corruption scheme at the Railroad of Moldova – the RRM Corruption Scheme: 15 persons are targeted in illicit money collection for camouflaging the deviations from the transport of passengers and luggage. The action took place within the 34 criminal cases, initiated for corruption acts, in which different employees of the company are suspected.

According to the materials accumulated by the Center, the decision makers of „Railroad of Moldova" would have set up a scheme through which they have collected money from the wagon attendants to camouflage irregularities connected to the illicit transportation of the passengers and luggage, but also to facilitate the promotion of some employees.



- Detention of six persons, within the framework of a case that targets illicit enrichment scheme from selling burial places at Sfântul Lazăr cemetery. The detentions took place within over 130 criminal cases, initiated for acts of active and passive corruption, influence peddling and fraud, all 6 persons are suspected of claiming illegal money from relatives of the deceased, who were to receive a burial place at the cemetery.
- Investigation of the corruption scheme at the National Agency of Road Transport (ANTA) for the sale of unitary authorizations for the transport of goods. Eight people, including former and current ANTA employees, but also economic agents, drew the attention of the National Anticorruption Center, being suspected of the abuse of office and forgery in public documents. Following the completion of the investigation, two criminal cases were initiated - for abuse of office and forgery of official documents.
- High value target operation of the NAC – Europol, where four persons were detained in a match-fixing case. The criminal case was initiated on manipulation of sports events. The operation was carried out jointly with the representatives of EUROPOL and UEFA, who delivered operational, informational and analytical support to the investigation for the full and multidimensional investigation of all the circumstances.

During the period under review, the criminal prosecution body detained 943 criminal cases (General Directorate on Criminal Prosecution - 639, General Territorial Directorate North - 188, General Territorial Directorate South - 116), of which:

- 644 - initiated by the criminal prosecution officers of the Center (General Directorate on Criminal Prosecution - 439, GTD North - 138, GTD South - 67);
- 212 - received according to the competence of other criminal prosecution bodies;
- 87 - resumed in the procedure.

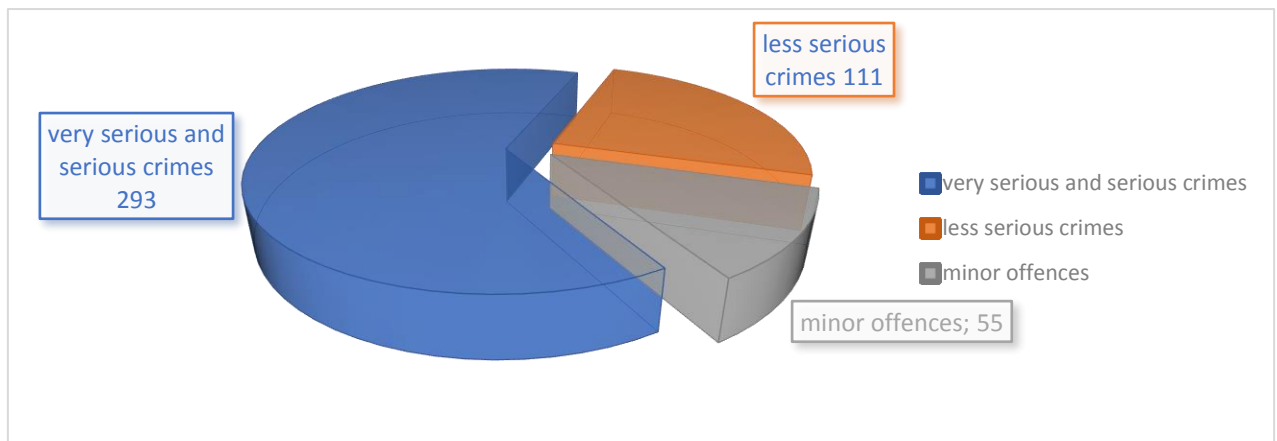
In total, 1530 criminal cases were in the management of the prosecution officers (including the rest of the criminal cases), which represents a decrease compared to the previous year by 19.2% (the year 2019- 1893 of criminal cases).

Of the 644 criminal cases initiated by criminal prosecution officers, 546 constituted corruption and related offenses (170 – influence peddling, 128 - passive corruption, 47 – active corruption, 39 - abuse of power or abuse of office (including in the private sector), 30 – embezzlement of assets by using employment situation, 20 –forgery of public documents, 12 -



excess of power or excess of official authority, 5 – bribing, 4 – illicit enrichment, 3 - negligent performance of duties, 1 – taking bribes, 13 – from the category of economic-financial crimes and 172 from other categories.

According to the gravity of the corruption and related offences, the criminal cases are divided as follows: 36 - on very serious crimes, 257 - serious, 111 - less serious and 55 - mild.



At the same time, prosecution officers have finalized 517 criminal cases. Of these, 170 – with regard to 204 accused persons were referred to justice, of which: 150 – with regard to 181 accused were the criminal cases on corruption and related offenses, 4 - with regard to 4 accused on economic-financial offenses, and the remaining 16 criminal cases related to 19 accused persons on other categories of offenses.

Depending on the categories of subjects and the areas in which these persons exercised their activity, the criminal cases that were finalized and sent to the court are classified as follows:

- from the law enforcement bodies – 32 persons, of which: 20 - collaborators of the Ministry of Internal Affairs, 4 – inspectors from the Customs Service, 2 – inspectors and specialists from penitentiary institutions, 2 – lawyers; 1 head and 1 inspector of the Registry Office, 1 - prosecutor's consultant, 1 – court technician;
- from the central and local public administration – 8 persons, of which: 3 – mayors, 3 - officials and specialists from the local and central public administration, 2 - secretaries of the City Hall
- from medical institutions - 6 persons, of which: 4 – doctors and 2 heads of departments within medical centers;



- from educational institutions - 2 persons, of which: 1 – directors of middle school, 1 – teacher.
- from other fields – 117 persons.

Concomitantly, in 347 criminal cases, criminal prosecution has been terminated based on different reasons, including that of non-rehabilitation for 20 criminal cases (based on art. 275, point 4, 5 and 9 Code of Criminal Procedure, in connection with the expiry of the limitation period, the death of the perpetrator and when there are other circumstances provided by law which exclude criminal prosecution.)

In other 35 criminal cases, criminal prosecution has been suspended due to different reasons, including 30 in connection with the evasion of the accused from the criminal investigation; 4 - in connection with the non-identification of the person who committed the crime and in a criminal case - in connection with the refusal to extradite.

In order to eliminate causes and conditions that have contributed to the commission of the crimes, the Center's prosecution officers have forwarded 78 notifications to the leaders of organizations and enterprises (GDCCP – 36, GTD North – 23, GTD South – 19).

Criminal Processes Examined

In addition to the criminal cases, 1126 criminal processes have been in the procedure of the criminal prosecution body, for examination, according to the provisions of art. 274 Criminal Procedure Code, of which 1095 were solved in the reference period, including for 644 - criminal cases were initiated, 404 - were submitted to the prosecutor with a proposal not to initiate criminal prosecution, 44 - annexed to other criminal processes and cases, and 3 - were sent, according to their competence, to other criminal prosecution bodies.



Ensuring the Respect of Human Rights in the Application of Procedural Measures of Constraint

In 2020, criminal prosecution officers have detained 106 people. Regarding 23 people, the courts have ordered the application of the preventive measure in the form of arrest, and regarding 83 persons, other procedural measures of restriction were applied.

CRIMINAL ASSETS RECOVERY

On 22.01.2020, the new personnel was approved, in the modified version, by replenishing the staff of the Agency for the Recovery of Criminal Assets with 17 units.

During the reporting period, the Agency was involved in the execution of 158 delegations for 308 subjects, out of which 141 delegations were executed, having the rest from 2019 - 85 delegations regarding 195 subjects on 56 criminal cases.

As a result of the parallel financial investigations, during the reference period, 1963 material goods and assets were seized, involving 96 subjects and amounting in total to 1.049.266.887 lei.

Issuing body	No. assets	Seized assets (lei)	Subjects	Criminal cases
GDCP of the NAC	79	12 096 597,58	19	12
GTD South of the NAC	12	771 646,00	2	2
GDCP of the MIA	7	253 682,00	1	1
GP	907	219 185 632,02	8	1
AP	416	351 295 553,80	29	9
POCOCSC	135	443 992 486,54	16	8
Pros. Chişinău	384	17 852 453,54	13	2
Pros. Anenii Noi	1	75 048,00	1	1
Pros. Călăraşi	9	905 050,00	2	1
Pros. Nisporeni	3	302 945,50	1	1
PI Căuşeni	4	1 268 726,62	1	1
PI Drochia	5	1 207 674,50	2	1
Total	1963	1 049 266 887,10	96	41



At the same time, during the reference period, funds in the total amount of 41,295,313 lei were deposited on ARBI's treasury accounts.

Type of assets	Quantity	Sequestration
Actions	10	2 123 861,50
Social capital	53	44 395 970,01
Residential construction	45	144 561 718,36
Non-residential construction	150	184 321 289,48
Bank account	89	155 247 358,68
Claims	1	3 995 459,78
Residential room	88	127 950 989,43
Non-residential room	76	90 628 418,83
Transport means	131	70 263 455,28
Cash	41	36 010 076,47
Agricultural land	1171	16 212 634,05
Land for construction	76	112 260 822,00
Agricultural equipment	5	254 368,50
Other goods	27	61 040 464,74
Total	1963	1 049 266 887,10

During 2020, the Agency was appointed as an expert from the Government of the Republic of Moldova in the field of criminal assets recovery, in the context of evaluating Slovakia on the implementation of the UN Convention Against Corruption.

The CARA was also involved in the process of monitoring the implementation of the recommendations submitted on the Country Report prepared and adopted during the Evaluation Round by the Moneyval Committee of the Council of Europe of the national system of the Republic of Moldova for preventing and combating money laundering, terrorist financing and the proliferation of weapons of mass destruction.

In 2020, a key contribution was made to the elaboration, promotion and approval of draft normative acts vital for the efficient development of the Agency's activity, namely:

- the draft law on amending some normative acts (in this case - the Criminal Code, the Code of Criminal Procedure and Law no. 48/2017 on the Criminal Assets Recovery Agency), approved by the Government;



- the draft Government decision on approving the Technical Concept of the Automated Information System "Register of Seized Criminal Assets" and the Regulation on the maintenance of the State Register of Seized Criminal Assets formed by the Automated Information System "Register of Seized Criminal Assets " - approved by GD no.34/2020;

- the draft Government decision for amending the Regulation on assessing, managing and estimating the value of criminal assets (seized), approved by Government Decision no.684/2018 - approved by GD no.424/2020;

- the draft order "On the approval of the internal structure and the number of units within the subdivisions of the National Anticorruption Center" - approved by the Order of the NAC Director no.1/2020;

- the draft Instruction on the record and management of financial means obtained from estimating the value of frozen assets, as well as seized financial means, in the treasury accounts managed by the Criminal Assets Recovery Agency - approved by the NAC Director and sent to the Ministry of Justice for registration.

The connection to the EUROPOL / SIENA secure channel was successfully managed, as well as the direct, secure and encrypted exchange of information with several relevant data providers, including commercial banks.

PREVENTION OF CORRUPTION

One of the principles in the Center's activity is the priority of applying corruption prevention methods to those of combating.

In this respect, the preventive measures implemented by the institution are as follows:

- » anticorruption awareness raising and education;
- » anticorruption expertise of normative acts;
- » institutional integrity assessment; professional integrity testing;
- » strategic and operational analysis of corruption;
- » monitoring and evaluating anticorruption policies;
- » international cooperation.



Anticorruption awareness-raising and education measures

Among the factors favoring corruption is the high level of social acceptability of corrupt behavior, but also the low awareness of public agents regarding ethics and integrity. Building on this desideratum as well as the priorities of the corruption prevention activity in the Center's strategic objectives, public awareness-raising campaigns and trainings for public officials were launched. These were designed to promote integrity and anticorruption standards, strengthen the institutional and professional integrity system, educate society and public agencies in the active spirit of denouncing corruption manifestations.

The anticorruption education carried out in 2020 was oriented towards training and information activities of the target groups, awareness campaigns, consultative and methodological support of the public entities in implementing the integrity standards, working with the civil society and external partners in order to increase the efficiency of prevention mechanisms.

In this regard, 217 training activities were carried out in the fields of integrity and anticorruption for 7483 persons, representing various target groups, namely: public servants, students and citizens. Compared with the year 2019 (730 activities for 38022 people). In 2020, the decrease in the number of activities and the number of persons occurred as a result of Disposition no. 6 of 26.03.2020 of the Commission for Exceptional Situations of the Republic of Moldova, as well as subsequent decisions of the National Extraordinary Public Health Commission, which established / prolonged state of emergency in health.

Even if the institution operated in extreme conditions, the collaborators of the subdivision responsible for education and raising awareness carried out activities and ensured the further implementation of the projects, throughout the country, namely:

- training the members of the Government, entitled “The role of the Government in consolidating the climate of integrity”;
- collaboration with the training centers of the public entities, being elaborated a Curriculum “Integrity and Anticorruption”, which includes recommended modules to be included in the professional training plans of the public entities;
- the training platform for public agents, the resumption of the process of elaborating the e-learning platform of the Center. During the year, the training curriculum in the field of integrity and anticorruption for this platform was modified and completed. The content of



- the training topics within 4 Modules, the tests for each topic, the respective informative support and the final test for Module II were elaborated;
- collaboration with the Chisinau City Hall, being developed a curriculum for managers and deputy managers of educational institutions in Chisinau "Integrity and integrity control in educational institutions in Chisinau";
 - continuation of the project “Anticorruption Official”, being organized the training “Functionality of the specialized anticorruption lines and of the institutional information lines”, with the participation of 40 representatives of the public entities;
 - collaboration with the Transport Registration and Driver Qualification Department of the Public Services Agency;
 - the project “An Anticorruption Day in Your City”, being organized 7 trainings with the participation of 560 people;
 - collaboration with the institutions of the Ministry of Internal Affairs within the “We Do Not Accept Corruption in The Police” campaign. In November, joint meetings were held with the participation of representatives of the Center and the IGP in order to prepare awareness-raising activities, which took place on the occasion of Anti-Corruption Week, in the context of December 9, International Anti-Corruption Day: within the GPI - launch of the information campaign "Denounce! Your Attitude Matters!";
 - the joint project of the Center and UNDP Moldova “A lesson in Integrity from Kapushon”, an information and awareness campaign for young people launched in March 2020. Awareness-raising activities took place in Leova and Hâncești, with the participation of 760 students and high school students, as well as 90 public agents - teachers;
 - training of pupils and students in the spirit of integrity and intolerance towards corruption, being carried out 30 trainings with the participation of 2299 audiences;
 - the “Pro Integrity” QUIZ project - an interactive educational project in the form of a Quiz. Its objective being to strengthen the culture of integrity among pupils, high school students, students in terms of interactive assimilation of information on the premises and effects of the phenomenon of corruption;
 - the anticorruption volunteers of the National Anticorruption Center, during 2020 carried out activities in order to realize the project “Anticorruption Dictionary” and the social theater, the terms being exposed in 10 video spots, which were placed in the virtual space and publicized on social networks. During the state of emergency, the volunteers were involved in creating / promoting on social networks the messages "Pro-integrity during the



- COVID-19 pandemic". Also, in October, the applications of anticorruption volunteers at the 2020 Volunteer Festival were coordinated, and the application for participation in the international competition organized by the General Prosecutor's Office of the Russian Federation was sent, under the title "Together against corruption";
- the anticorruption summer school took place between July 27-31, with the participation of 100 pupils and 30 students, and as trainers - specialists in the field from the anti-corruption authorities of the Republic of Moldova, representatives of civil society and experts from Romania. Support in the organization and conduct of the school was provided by UNDP-Moldova;
 - collaboration with the UNDP-Moldova project, which is in its second year of work and financially / technically supports practically all information and awareness activities of the institution;
 - collaboration with the private sector. A unique activity, carried out during the reporting period is the nomination "Implementation of integrity standards in the private sector" within the contest "Trademark of the Year". The organizers drafted and approved the Competition Regulations, held a meeting with representatives of the private sector in order to promote participation in it. Thus, 25 representatives of economic agents from the country participated. After the launch of the competition, advice was offered to pre-selection candidates. With the support of the UNDP-Moldova, the video for the Integrity Award was launched, in order to promote the Business Integrity Award, for the Moldovan business. The competition commission, following the examination of the participation files, designated the winners: six private companies from the Republic of Moldova, for the implementation of business integrity standards. The award was presented at an online ceremony. The nomination aimed at highlighting companies that implement integrity standards in companies, and through its example and disseminated good practices, facilitates and encourages the implementation of integrity standards in the private sector. Thus, the award for business integrity comes to support honest business and strengthen the integrity component in the private sector, contributes to creating a competitive, fair business environment, based on standards of integrity, transparency and professionalism in interaction with the public sector;
 - collaboration with the civil society, continues both in the field of implementation of anticorruption plans and in the field of promoting integrity standards. The participation in 4 round tables was ensured, jointly with the representatives of the relevant authorities and



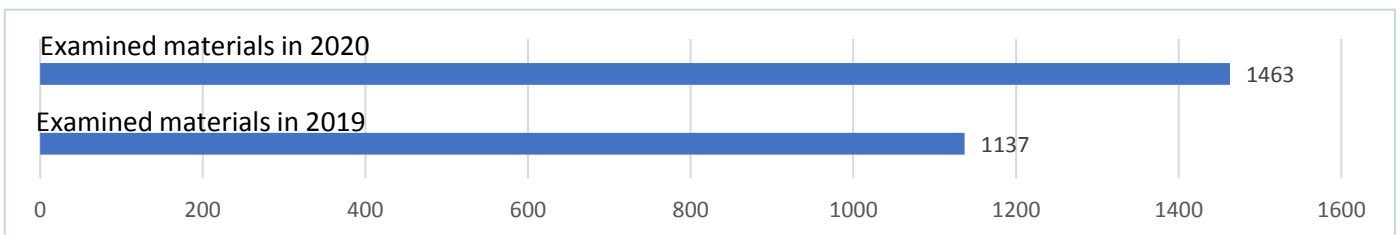
of the civil society, organized by the UNDP-Moldova, regarding the presentation of the alternative monitoring report of the sectoral anticorruption plan in the field of education and local anticorruption plans;

- participation in the conference "How we involve the community in the fight against corruption". The event was organized by the Center for Policy and Reforms, jointly with partners from Estonia - e-Governance Academy. The event aimed to inform the public about solutions that support the fight against corruption and additional activities to reduce corruption in the public and business sectors, the experiences of the Republic of Moldova and Estonia;
- participation in 2 TV shows broadcast by Publica TV, the subject discussed being corruption in the driving licence exams and on the TV Moldova channel "Moldova live", with the theme of awareness activities carried out on the occasion of the International Anticorruption Day.

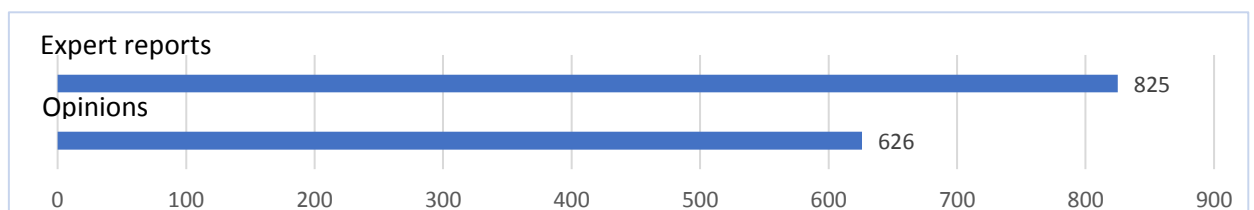
Anticorruption Expertise of Normative Acts

A specific and particularly important preventive action, which falls within the competence of the Center, is the analysis of the level of corruption of the draft normative acts.

Thus, during 12 months of 2020, 1463 materials were sent to the NAC for examination. Compared to 2019 - with projects 326 more.



During the reference period, 825 anticorruption expertise reports were prepared and 626 opinions on draft normative acts were issued.





According to the results of the substantive assessment of projects subject to expert examination, 3393 corruption factors were identified, of which:

- absence / ambiguity of administrative procedures - 644;
- gap in the law - 443;
- an ambiguous formulation that allows for misinterpretation - 377;
- assignments that allow deviations and misinterpretation - 354.

From the total number of 825 expertised projects:

- 385 - are draft laws, 398 - draft decisions of the Government, and 42 - draft departmental acts;
- 324 - full drafts, 489 - amendments and / or additions, 8 - repeals and 4 draft interpretations.

From the total of the recommendations submitted in the anticorruption expertise reports and accepted by the project authors, for the reporting period an efficiency of the anticorruption expertise of about 71% was established.

On 17.06.2020, the “reLAWed” platform was launched, developed within the project “Curbing corruption by building sustainable integrity in the Republic of Moldova” implemented by UNDP in partnership with the Center, with the financial support of the Norwegian Ministry of Foreign Affairs. Through the “reLAWed” platform, any person can report ambiguous or interpretable laws or normative acts that can generate acts of corruption, which are examined by the National Anticorruption Center in order to identify the risks of corruption, after which they are proposed for amendment.

During the reporting period, 6 alerts submitted via the "reLAWed" platform were received, and 5 of them were examined.

Institutional Integrity Assessment

Another proactive instrument for preventing corruption manifestations in the activity of a public entity is institutional integrity assessment, carried out by identifying corruption risks and analyzing factors that generate them, as well as providing recommendations for their elimination.

This activity is carried out by the Centre in accordance with the Law no. 325 of 23.12.2013 on institutional integrity assessment and the Methodology for identifying corruption risks within public entities, identifying public agents exposed to the risks and for analyzing risk factors that generate them, approved by the Order of the director of the Center no. 50 of 20 March 2018.



In 2020, the evaluation process of 4 public entities was completed, and the evaluation process is ongoing at 2 entities.

The problems identified in the process of applying the present instrument are diverse, but generally characterize the non-enforcement of the institutional integrity climate by decision factors, the corruptibility of normative and departmental acts, as well as their erroneous application, deficiencies in the organizational legal system and that of internal managerial control.

An assessment of the risks of corruption related to the evaluation, selection and acquisition of textbooks for general primary and secondary education was also carried out. The Ministry of Education, Culture and Research was informed about the identified problems, being offered a series of recommendations in order to remove them. The full evaluation report was posted on the website of the Center.

STRATEGIC AND OPERATIONAL ANALYSIS OF CORRUPTION

In the fight against corruption, the Center carries out extensive analysis both of the phenomenon in general and of acts of corruption in particular. Genesis factors, potential threats and vulnerabilities, the level and trends of corruption in the social and economic spheres of the Republic of Moldova and in the activity of public authorities, public and private law institutions and organizations are studied.

During the reference period, 12 analytical products were made at strategic level and 416 at operational level, regarding the phenomenon of corruption in the investigated cases and in the social-economic fields of the Republic of Moldova.

The analytical notes focused on some issues in the fields: the program for granting the citizenship of the Republic of Moldova through investments - 3; administration and privatisation of public property - 2; oil (price formation methodologies) - 1; public transport (price formation, development strategies and corruption vulnerabilities) - 1 and the purchase of textbooks for general primary and secondary education - 1.

Operational analyzes focused on the properties of public persons in relation to their income (50% of operational analyzes), relationships between extras (25%) and the activity of economic agents, including winners of public tenders (25% of analyses). The subjects who underwent



operational analysis were: persons with a position of public dignity / civil servants / public agents - 242 as well as natural / legal persons - 3094.

In the operational analyses, which targeted the properties of public persons in relation to their incomes, it was established:

- 68 cases of persons holding unjustified properties, the value of which amounts to approximately 102,88 mil. lei;
- 37 cases of non-declaration of 59 transport units, with a total value of 4.6 million. lei;
- 36 cases in which the non-declaration of 128 real estate was established, with a total value of 9.37 million. lei;
- 28 cases of non-declaration of 22 sources of income, in the amount of 7.7 million lei;
- 26 cases in which the subjects possibly own 302 real estate registered on third parties (relatives), amounting to about 86.92 million lei;
- 9 cases in which the shares held by extras in some companies were not declared;
- 8 cases of suspicious loans declared by the subjects in a total amount of 8.66 million lei;
- 7 cases of possible conflict of interest / abuse in which the related benefit was estimated at 4.39 million lei.

The operational analyses that focused on the relations between the people involved included 16 cases in which 2.3 million of telephone connections were analyzed, following which 8691 common connections between the persons were established. At the same time, 1516 relations (family, service, business) between the subjects were established.

In the operational analyzes regarding the economic-financial activity of legal entities, including beneficiaries of public funds and assets and their relations with public entities, the following aspects were established:

- in 64 cases 597 relationships were established between extras;
- 17 analyzed cases regarding suspicious loans in the amount of 668.2 million lei, with the establishment of the destination of the financial means used;
- 5 possible cases of conflict of interest, in which the benefit obtained may amount to 65.6 million lei.



MONITORING AND EVALUATION OF ANTICORRUPTION POLICIES

Responsibility for strengthening the national climate of integrity, systematizing and streamlining the efforts of public entities in the field of corruption prevention and combating are coordinated within the main public policy instrument - National Integrity and Anticorruption Strategy for the years 2017-2020 (NIAS, Strategy).

Ensuring the monitoring and evaluation of the strategy implementation process is carried out by the National Anticorruption Center, which also ensures the secretariat function of the Strategy Monitoring Groups.

In the process of monitoring and evaluating the implementation of the Action Plans of the National Integrity and Anticorruption Strategy, in the course of 2020, the Monitoring and Evaluation Report of the National Integrity and Anticorruption Strategy for 2017-2020, the reporting period - 2019, was issued, as well as the Monitoring and Evaluation Report of the National Integrity and Anticorruption Strategy, the reporting period, the semester I of the year 2020, that were posted on the official web-site of the National Anticorruption Center www.cna.md, in the subdivision/National Anticorruption Strategy/Strategy Implementation/Evaluation reports/Monitoring reports.

The reports include an analysis of the progress reported by the implementing institutions (52 central public administration authorities and 34 local level II local government authorities) according to the reports submitted to the SNIA Monitoring Group Secretariat; assessment, including quantitative assessment of the implementation of actions based on progress indicators, expected results and result indicators; as well as the description of the risks for carrying out the actions due at the end of the next semester; description of the impact of the implementation of the SNIA according to the impact indicators, the indicators of the general objectives and the purpose of the Strategy; as well as the reflection of the evolutions in the Grid of impact indicators of the Strategy, according to some alternative data sources collected from other surveys carried out by non-governmental organizations, national and international organizations.

The meeting of the Monitoring Group 2, responsible for the Pillars: II, was ensured. The government, public sector and local public authorities and VII. Private sector (21.07.2020). During the meeting, the progress and difficulties in the implementation of the Action Plans of the above-mentioned pillars were publicly audited, which aim at assessing the progress made and identifying the actions to solve the challenges found.



In order to facilitate the efficient, equidistant and impartial implementation of the Strategy with the support of the project "Curbing corruption by building sustainable integrity in the Republic of Moldova", implemented jointly with UNDP Moldova, with the financial support of the Norwegian Ministry of Foreign Affairs, the presentation of the Evaluation Study of the impact of the National Integrity and Anticorruption Strategy, for the period 2019.

At the same time, with the support of the project "Curbing corruption by building sustainable integrity in the Republic of Moldova", during the report period were organized 4 public meetings to present alternative monitoring reports developed under the Small Grants Program - "Monitoring the National Integrity and Anticorruption Strategy through the preparation of alternative monitoring reports for sectoral and local anti-corruption action plans." As a result, in addition to reporting according to the default format, public authorities have been monitoring in the field, including by assessing the experiences of citizens benefiting from services in the sector.

In the alternative, in order to successfully achieve the progress indicators, set out in the action plans, during the reporting period, another 8 NGOs were selected to ensure the continuity of the process of alternative monitoring of sectoral / local anticorruption plans within the Program of small grants - "Monitoring the National Integrity and Anticorruption Strategy by developing alternative reports for monitoring sectoral and local anticorruption action plans".

At the same time, 2 public consultation sessions were held on the implementation of the actions provided in the Sectoral Anticorruption Action Plans for the following areas: customs and environmental protection, attended by representatives of public entities responsible for implementing sectoral plans in the above areas, such as and members of public associations.

Also, in 2020, the process of assessing the impact of the Sectoral Anticorruption Plan in the fiscal field for the years 2018-2020 was initiated by the Public Association IDIS "Viitorul". Thus, during the period covered, six meetings were held with the contracted experts, as well as the approval of the draft Methodology for the evaluation of the above-mentioned plan and the Questionnaires, as part of this methodology. The launch of the Evaluation Report on the impact of the sectoral plan for anticorruption actions in the fiscal field for 2018-2020, which has as main objective the presentation of the results of the evaluation process both in terms of progress in implementing the Sectoral Anticorruption Plan in fiscal field made between 2018 and 2020, as well as highlighting the recommendations on strengthening the institutional integrity of the State Tax Service and



reducing corruption in the fiscal system, was included on the agenda of Anticorruption Week, started by the National Anticorruption Center, on December 7-11, with on the occasion of the National Anticorruption Day, celebrated on December 9.

At the same time, in 2020, the development process of the electronic platform "Institutional e-Integrity" was completed, which contains the Implementation Reporting module "National Anticorruption Strategy", designed to report progress and deficiencies in the implementation of the Strategy by public reporting entities. In this regard, the Instruction on Electronic Reporting of the implementation of the National Anticorruption Strategy was elaborated, as well as a video tutorial for familiarizing public agents with the process of electronic reporting of the Strategy. The piloting of the Module was applied in the reporting process of the progress registered in the implementation of the Strategy, the reporting period-first semester of 2020. Also, in the reporting process for the reporting period-2020, public entities will use the electronic platform for reporting progress and shortcomings in the implementation of the SNIA.

Subsequently, in order to ensure the continuity of the implementation of the policy document - the National Integrity and Anticorruption Strategy, in accordance with the Decision of the Parliamentary Commission for National Security, Defense and Public Order no.275 of 25.11.2020, the deadline for implementing the National Integrity and Anticorruption Strategy for the years 2017-2020 (Parliament Decision no.56 of 30.03.2017, in force on 30.06.2017), is to be extended by two years, according to the provisions of Chapter V "Reporting and Monitoring Procedures" of the Strategy. Thus, requests were made to the actors involved in the implementation process, to submit proposals for supplementation with additional actions to ensure the achievement of the objectives set out in the policy document, based on the institutional competencies and shortcomings in the implementation of the Action Plans for Pillars I-VII of the National Integrity and Anticorruption Strategy. Following the reception of the proposals that formed the basis of the draft Action Plan of SNIA for the years 2021-2022, and the endorsement of the experts involved in this exercise, the draft Parliament Decision on amending the Parliament Decision no.56 of 30.03.2017 for the approval of the National Integrity and Anticorruption Strategy for the years 2017–2020, which was placed on the NAC website, to ensure the process of public consultation of the project.



INTERNATIONAL COOPERATION

The effective approach to the phenomenon of corruption requires a continuous development of the existing instruments, as well as the development of the initiative in taking over the good international practices. For this purpose, one of the objectives of the institution is to develop cooperative relations with similar institutions / organizations abroad, diplomatic and consular missions accredited in the Republic of Moldova, with foreign, regional and international organizations / institutions, EU Member States and other donors. (external development partners).

In order to ensure a constructive dialogue with the EU institutions and to present the progress made at the national level, the Center participates in the meetings of the bilateral structures created for the implementation of the partnership with the EU such as: the EU-Moldova Association Council, the EU-Moldova Parliamentary Association Committee, the EU-Moldova Association Committee (19.02.2020), Subcommittee on Freedom, EU -Moldova Security and Justice (24.09.2020) and others. Thus, reports were prepared regarding the fulfillment of the commitments assumed in the dialogue with the EU structures for the organized meetings.

In 2020 the Center continued to coordinate the process of evaluating the implementation by the Republic of Moldova of the Convention of the United Nations Against Corruption. The exchange of information on the achievements in the field of anticorruption and the good practices accumulated culminated with the participation of the NAC delegation at the 8th Session of the Conference of States Parties to the UN Convention against Corruption (16 - 20.12.2019, Abu Dhabi).

In order to ensure the effective application of the mechanisms for preventing and combating corruption, of the new techniques and tools in the field, in 2020, the Center participated in establishing and implementing actions in the context of external assistance projects, which contribute to the strengthening of the institutional capacities of law enforcement bodies as well as other entities involved in the fight against corruption in the Republic of Moldova, in order to implement the priorities established at the national level in a sustainable manner.

The joint project of the European Union and the Council of Europe " Controlling Corruption through Law Enforcement and Prevention in Moldova " (CLEP), planned for the period 2017 - 2020, aimed to support the reform of the anticorruption regulatory framework and the efforts of institutions in accordance with European and international standards, as well as to contribute to the strengthening of national and international cooperation of specialized law enforcement and prevention systems. During and until the completion of the project, a series of activities were



carried out that the Center benefited from, which mainly referred to legislative consultancy, specialized training, evaluation missions and others.

The project "Curbing corruption by building sustainable integrity in the Republic of Moldova", is planned for the period 2019 - 2021 and will contribute by strengthening the capacities of public and private sector entities and the civil society, for the effective application and monitoring of national integrity policy, instruments and standards, as well as through increased public perception and anticorruption demand, extended civic participation. This will contribute to strengthening the efforts of stakeholders in the process of implementing and monitoring the National Integrity and Anticorruption Strategy, as well as in developing the effectiveness of corruption prevention tools.

The project "Support for Eastern Partnership countries to improve the mechanism for recovering criminal assets" is part of the Project "Fight against organized crime in the region of the Eastern Partnership", planned for the period 2020 - 2023. The general objective of this project is to create increased capacity in the Eastern Partnership countries to: pursue, freeze, seize, confiscate, recover and manage assets related to organized or related serious criminal activity, in a better alignment with international standards.

The project „Breaking the Silence: Enhancing the whistleblowing policies and culture in Western Balkans and Moldova”, planned for 01.04.2020 – 01.04.2023. The overall goal of the project is to provide assistance to RAI partners in governmental and non-governmental sector and namely by:

- improving the channels for disclosing illegal practices and the mechanisms for protecting whistleblowers by strengthening the normative and institutional framework;
- strengthening the capacity of the civil society to support whistleblowing through public policies, public education, legal assistance and other support for whistleblowers;
- raising society's awareness, especially of young people, of the importance of whistleblowing in the fight against corruption and educating society about the protection mechanisms of whistleblowing.

At the same time, it has to be noted that the Center continues to ensure the implementation of the recommendations of the experts of the Twinning Project of the European Union " Support to the strengthening of the operational capacities of the Law Enforcement Agencies of the Republic of Moldova in the field of investigation of criminal acts of corruption," which ended on 05.09.2019.



INTERACTION WITH CIVIL SOCIETY

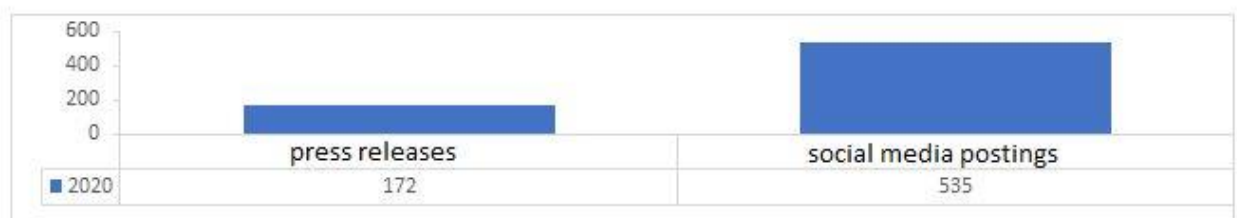
In 2020, communication with the public was continued through the available tools, focusing primarily on raising the level of information of the population and attracting its support in the fight against corruption, with the main emphasis being placed on the fact that “the Center is an institution that comes to support the citizen, defending his/her legal rights and interests”.

The institution has undertaken to provide quality information to the public, to take all reasonable steps to ensure the objectivity, fairness and impartiality of the dissemination of information of public interest. Specifically, the Center has used the image promotion opportunities by disseminating press releases on the institution’s website, by distributing them on social networking sites, mainly on the Facebook page of the institution, by ensuring the participation of the institution’s leadership to public events, to press - conferences, television and radio shows, information campaigns, roundtables, etc.

„Synthesis of the week” - information showing the work of the most important divisions of the institution for a week that appeared for the first time 2018, is in high demand.

The National Anticorruption Line is still widely publicized. Permanent information has led to a substantial increase in the number of calls and it is encouraging that calls that are registered contain information, the examination of which is within the competence of the Center.

Thus, on the web page of the institution – www.cna.md , 172 press releases were placed. In addition to the NAC official communications, 360 posts have been elaborated on the Facebook page and 175 posts on the institute's Instagram page and their impact has been monitored. The total number of views on the cna.md website is around 363,665, on Facebook and Instagram - around 824,335 views.



The event with the greatest impact referred to the topic: " Laws generating corruption may be reported through a platform launched by UNDP and National Anticorruption Center ", and the post garnered 164,006 views.



The communiqué with the greatest impact - " Obscure business on the health of the people who lost the ability to work. Tens of people forced to give bribes for granting disability degree "accumulated 100,000 views.

It should be mentioned that there is an increase in the number of views and, respectively, in the interest of citizens for the Center's interventions in the social fields - the sectors closer to the daily interests of the people.

For a better result, in 2020, the NAC Communication Strategy for 2020-2023 was approved, which will streamline the internal and external communication process, by achieving the main elements of the communication process and will have a positive impact on both the image institution, as well as on the processes of interinstitutional cooperation.

OBJECTIVES AND PRIORITIES FOR THE YEAR 2021

Presentation in time and in the established manner of the Report on Monitoring the Execution of the NIAS Implementation Plan 2017-2020.

Promoting the draft legislative acts, which were not approved in 2020, related to the efficiency of the activity of the Center.

Starting additional actions to effectively promote policies to prevent and combat corruption in the priority areas for 2021.

Adjusting the legal and institutional framework to international standards in the field of international cooperation.

Promoting the image of the Center through all available tools, a special priority being to increase the visibility and transparency of the institution, which will lead to increasing the credibility of society to the institution and last but not least by implementing the NAC Communication Strategy for 2020-2023.

Preventing and combating the phenomenon of corruption in:

- centralized public procurement in health, primarily those carried out in the context of the pandemic caused by the COVID-19 virus;
- execution of road repair programs in the Republic of Moldova;
- the privatization process of the patrimony of the Republic of Moldova.