Appendix No 2

to the Decision of the Government of the Republic of Armenia

No .... -L

… 2023

**2023-2026 ACTION PLAN DERIVING FROM THE ANTI-CORRUPTION STRATEGY OF ARMENIA**

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| **STRATEGIC GOAL 1: PREVENTING CORRUPTION AND STRENGTHENING INTEGRITY SYSTEMS** | | | | | | | | | | | | | | | |
| **EXPECTED RESULTS** | 1. **The Law on Preventing Corruption is drafted and adopted.** 2. **The CPC staff passed training; the procedures and implementation mechanisms of the proceedings initiated and implemented by the CPC are improved.** 3. **Guidelines and methodological manuals are developed to assist integrity officers in due performance of their duties; at least 50% of integrity officers passed training by the end of 2025.** 4. **The work of ethics commissions is enhanced particularly through the development and usage of guidelines and methodological manuals; ethics commissions are formed and successfully function in bodies where they are not available yet.** 5. **Statistics management methods and guidelines are developed and applied in the area of corruption prevention.** 6. **Preventive tools are digitized; the processes of filling in declarations and integrity questionnaires are automated to the possible extent.** 7. **The preconditions for ex ante and ex post review of draft legal acts have been established and the authorized agency is defined. The conclusions of the anti-corruption review of legal acts are available in practice.** 8. **Relevant organizational and legislative measures are implemented by state and local self-government bodies to identify, evaluate, and combat corruption risks.** 9. **Effective utilization of the electronic declaration system is ensured.** 10. **The list of positions that are subject to integrity check is expanded.** 11. **Effective oversight and accountability of political parties' financial activities is ensured.** 12. **Effective measures are introduced to enforce restrictions on gift acceptance; the gift register is established.** | | | | | | | | | | | | | | |
| **EXPECTED IMPACT** | * **A unified and comprehensive legislation on the state policy of preventing corruption is introduced in the national legal system.** * **The system of integrity has continuously expanded over the years to include new sectors and a greater number of public officials and servants as compared to 2022.** * **The scope of officials required to submit declarations has continuously expanded over the years as compared to 2022, ensuring public accountability and transparency.** * **Effective legal frameworks and tools are established for public oversight over corruption prevention.** | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **DEVELOPING THE INSTITUTIONAL SYSTEM FOR PREVENTING CORRUPTION** | | | | | | | | | | | | | |
| **Activity 1.1**  Review the procedures for selection and liability of the Commission members. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | | | Implementing Body | Co-implementing Body |
| 2023 | 2024 | | | 2025 | | | 2026 | The RA Government has approved the relevant amendments to the Law on Corruption Prevention Commission and other related legal acts and submitted them to the RA National Assembly. | Available legal acts  Semi-annual and annual monitoring reports | | | RA Ministry of Justice | Corruption Prevention Commission (upon consent)  Civil Service Bureau of the RA Prime Minister's Office (upon consent)  Civil society organizations (upon consent) |
| It is necessary to establish criteria to strengthen the requirements and selection procedures for Commission member candidates. The selection procedure does not provide for involving specialized civil society institutions, while the legislative body has a significant influence. Regulations regarding members' liability and termination of powers are incomplete.  Contrary to the social benefits granted to the persons occupying positions in the Anti-Corruption Court and relevant departments of the Prosecutor's Office and anti-corruption courts, the remuneration of Commission members and employees is not differentiated, while it is one of the guarantees for the autonomy and unimpeded activity of the Commission's staff (including Commission members with autonomous positions). | II | I | II | |  | | |  |
|  |  | The requirements towards the members and their selection procedure are revised in the legislation, ensuring the participation of specialized civil society institutions. The regulations regarding liability and termination of powers are also revised to enhance the toolkit for individual accountability, effectiveness, and liability of the Commission members as independent autonomous position holders. | |  | | |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | |
| **Activity 1.2.**  Improve the regulations on the proceedings conducted by the Corruption Prevention Commission, define their features, and clarify the functions of the Corruption Prevention Commission as an administrative body. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | | | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | | 2026 | The RA Government has approved the relevant amendments to the Law on Corruption Prevention Commission, the RA Code on Administrative Offenses, the Law on Fundamentals of Administrative Action and Administrative Proceedings, and other related legal acts, and submitted them to the RA National Assembly. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | | RA Ministry of Justice | Corruption Prevention Commission (upon consent) |
| 1. The features of conducting various proceedings initiated by the CPC are not defined by the law  2. There is a lack of clarity regarding the terms of "verification" and "analysis" of declarations; no regulations are set to specify the details of the verification process, including verification concept, grounds, timelines, procedure and criteria. This results in a lack of certainty throughout the process. | II | I | II | |  | | |  |
|  |  | Legislative amendments are drafted to define the features of proceedings initiated by the CPC, clarifying the terms used, and setting timelines. | | The package of legislative amendments is approved by the RA Government and submitted to the RA National Assembly for adoption. | | |  |
| **Financing** | Sources not prohibited by law | | | | | | | | | | | | | | |
| **Activity 1.3.**  Improve the institute of integrity officers. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | | | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | | 2026 | 1. All necessary revisions to the status of integrity officers in state and local self-government bodies are made based on the collected data.  2. The RA Government has approved the relevant amendments to the Law on Public Service, the Law on Civil Service, and other related legal acts, and submitted to the RA National Assembly for adoption.  3. Guidelines and methodical manuals have been developed to ensure the appropriate implementation of integrity officers' functions.  4. By the end of 2026, at least 80% of integrity officers have passed training courses with duration of at least six academic hours. As a result of the knowledge post-test, the trainees demonstrated at least 90% knowledge proficiency. | Available legal acts  Available methodological manuals and guidelines  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Semi-annual and annual monitoring reports  Press releases  Media publications | | | Corruption Prevention Commission (upon consent)  Civil Service Bureau of the RA Prime Minister's Office (upon consent) | RA Ministry of Justice |
| The institute of integrity officers has not been fully established yet. In the civil service, the integrity officer is an employee of the personnel management department. In some bodies, either the integrity officer’s position is vacant, or its functions are temporarily assigned to other officials or employees. | II | I | II | |  | | |  |
|  | Impediments to implementing the functions of integrity officers in state and local self-government bodies are identified and a study is conducted to assess the status of integrity officers. | 1. The status of integrity officers is reviewed based on identified issues and a study of international best practices and criteria.  2. Relevant legislative drafts are elaborated to review the status of integrity officers, ensuring their autonomy and impartiality. | | 1. Guidelines and methodological manuals are developed to ensure the appropriate implementation of integrity officers' functions.  2. Trainings are organized based on approved programs to enhance the professional knowledge of the integrity officers. | | | At least 80% of the integrity officers have received trainings |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | |
| **Activity 1.4.**  Improve the functioning of ethics commissions. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | | | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | | 2026 | 1. Relevant amendments to the Constitutional Law on Rules of Procedure of the National Assembly are developed.  2. The RA Government has approved the laws governing certain categories of civil and community service, as well as related legal acts based on the results of the studies, and submitted them to the RA National Assembly for adoption.  3. Guidelines and methodological manuals are developed and applied by ethics commissions. | Available legal acts  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Semi-annual and annual monitoring reports  Press releases  Media publications | | | RA Ministry of Justice  Corruption Prevention Commission (upon consent) | Civil Service Bureau of the RA Prime Minister's Office (upon consent) |
| There are no permanent ethics commissions for certain categories of civil servants, community servants, and MPs. Instead, temporary commissions are established as necessary, but their formation and operation are not fully guaranteed. | II | I | II | |  | | |  |
|  | 1. Impediments to the operation of ethics commissions for public servants are identified  2. The procedures for the formation and functioning of ethics commissions for MPs are defined by law. | 1. The possibility of forming ethics commissions for certain categories of civil servants and community servants with the guarantees of their operation is explored.  2. The package of required legislative amendments is approved by the RA Government and submitted to the RA National Assembly for adoption. | | Guidelines and methodological manuals are developed to ensure the proper implementation of ethics commissions’ functions. | | |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | |
| **Activity 1.5.**  Improve electronic systems for managing statistics in the field of corruption prevention. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | | | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | | 2026 | The methodology and guidelines are developed for collecting quantitative statistical data in the field of corruption prevention. | Available guidelines and standardized methodology  Semi-annual and annual monitoring reports  Press releases  Media publications | | | Corruption Prevention Commission (upon consent) | RA Ministry of Justice |
| There is no methodology for managing statistical data in the field of corruption prevention.  The systemic approach to statistics management is missing. This results in gaps in statistical data on certain issues, such as the activities of ethics commissions and integrity officers. | II | I | II | |  | | |  |
|  | Methodology and guidelines are developed for collecting quantitative statistical data in the field of corruption prevention. |  | |  | | | Professional trainings on the new methodology and guidelines are conducted. The methodology and guidelines are submitted to the respective bodies for incorporating in their training materials. |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | |
| **Activity 1.6.**  Expand the tools for conducting integrity checks. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | | | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | | 2026 | 1. A digitalization concept is developed.  2. Existing electronic tools are improved and modernized and new electronic tools are introduced.  3. Interoperability of electronic systems is ensured. | The Concept  The use of digital tools  Semi-annual and annual monitoring reports  Press releases  Media publications | | | Corruption Prevention Commission (upon consent) | RA Ministry of Justice  RA Ministry of High-Tech Industry RA Prosecutor General’s Office (upon consent) RA Investigative Committee (upon consent)  Anti-Corruption Committee (upon consent)  Central Electoral Commission (upon consent) |
| In some cases, the currently available tools do not allow to get a complete picture of the candidate's integrity and provide a final assessment, which creates specific obstacles for the evaluating body during the appointment process. The Commission faces difficulties in providing a final assessment mostly due to the lack of the following data or inefficient tools for verifying its reliability: a) confidential medical information, and b) information about the family members living with the candidates. | II | I | II | |  | | |  |
|  | 1. The digitization concept is developed and approved.  2. The scope of technical assistance is assessed, collaboration with donors is established, and coordinated implementation is ensured on the basis of the concept. | 1. The existing electronic tools are updated and the following actions are implemented:  1.1. Resolving issues related to the new electronic platform for declarations;  1.2. Developing the analytical module of the new electronic platform for declarations,  1.3. Creation and integration of the gift declaration module;  1.4. Creation and integration of the integrity check module;  1.5. Construction and integration of the module for financial oversight of political parties, including the pre-election campaign period. | | The integration and interoperability of systems used by the CPC and other state bodies, in particular, the Anti-Corruption Committee, the Department for Confiscation of Property of Illicit Origin under the GPO, and the Investigative Committee is ensured.  An electronic platform for integrity check is created to facilitate automated data download, reliability verification, as well as drafting conclusions and integrity checks by artificial intelligence following the current practices. | | |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **ANTI-CORRUPTION REVIEW OF DRAFT LEGAL ACTS** | | | | | | | | | | | | | |
| **Activity 1.7.**  Provide the anti-corruption review of draft legal acts, including both the drafts in the development stage (ex-ante) and the underlying or related legal acts (ex-post) as needed. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | | Co-Implementing Body |
| Currently, anti-corruption review of draft legal acts is not provided. Moreover, there is no possibility of ex-post examination of legal acts. | 2023 | 2024 | | | | | 2025 | 2026 | 1. The RA Government has approved the amendments to the Law on Normative Legal Acts and other related legal acts and submitted them to the RA National Assembly for adoption.  2. The body responsible for the review of draft legal acts is functioning. | | Available legal acts  Established authorized body/department | RA Ministry of Justice | | Corruption Prevention Commission (upon consent)  Civil Service Bureau of the RA Prime Minister's Office (upon consent) |
|  | I  The best international practices of conducting anti-corruption review of draft legal acts are studied with consideration of domestic needs. | | II  1. Based on the international experience, the applicable model for the review of draft legal acts is chosen.  2. The authority responsible for review is defined within the executive body.  3. The package of required legislative amendments is approved by the Government and submitted to the National Assembly for adoption.  4. The review methodology is collaboratively developed by the executive body and the CPC.  5. The capacities of the body responsible for the review of draft legal acts are strengthened. | | |  |  |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **IMPROVING MECHANISMS TO PREVENT CORRUPTION AND STRENGTHEN INTEGRITY** | | | | | | | | | | | | | |
| **Activity 1.8.**  Harmonize the legislation related to corruption prevention. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | | | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | | 2026 | The RA Government has approved draft amendments to the Law on Preventing Corruption and other related legal acts and submitted them to the RA National Assembly for adoption. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | | Corruption Prevention Commission (upon consent)  RA Ministry of Justice | Civil Service Bureau of the RA Prime Minister’s Office (upon consent) |
| There is no uniform legislative act that comprehensively regulates the components of the integrity system. Consequently, a consistent approach across various laws is often not ensured. | II | I | II | |  | | |  |
|  |  | 1. The draft Law on Preventing Corruption is developed, encompassing all the aspects of the integrity system, including aligning the application and regulation of the provisions on conflict of interest, limitations on gift acceptance, rules of conduct, incompatibility requirements and other restrictions, as well as other mechanisms related to the prevention of corruption. | | The drafts of the law and other related legal acts are approved by the RA Government and submitted to the RA National Assembly for adoption. | | |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | |
| **Activity 1.9.**  Take measures to establish corruption risk assessment and management systems in state and local self-government bodies. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | | | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | 2025 | | 2026 | 1. The RA Government has approved the amendments to the Law on Preventing Corruption and other related legal acts and submitted them to the RA National Assembly for adoption.  2. The best model for assessment and management of corruption risks in state and local self-government bodies has been chosen. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | | RA Ministry of Justice  Corruption Prevention Commission (upon consent) | RA Ministry of Territorial Administration and Infrastructure State administration bodies |
| The establishment of a corruption risk management system aims to set a unified policy for developing anti-corruption sector, identifying, analyzing, and managing corruption risks, as well as to apply mechanisms to manage emerging corruption risks and create an integrity environment within the entire public administration system. Such a system does not exist yet in the RA. | II | I | II | | |  | |  |
|  | A draft law is developed to introduce a new function for the state and local self-government bodies allowing them to develop a set of sectoral actions (remedial program) aimed at mitigating corruption and integrity risks based on corruption risk assessments, as well as providing mechanisms for their cooperation with the CPC. | A draft law is developed that tasks the CPC with identifying, assessing, and mitigating corruption risks in state and local self-government bodies. This includes the development and approval of methodologies for assessing and managing corruption risks, providing methodological and professional support for external sample evaluation, and supporting the creation and implementation of corruption risk prevention programs in state and local self-government bodies based on the results of corruption risk assessments. | | | The drafts are approved by the Government and submitted to the National Assembly for adoption. | |  |
| **Source of funding** |  | | | | | | | | | | | | | | |

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| **Acton 1.10.**  Extend the scope of declarant public officials. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | 2026 | The RA Government has approved the amendments to the Law on Public Service and other related legal acts and submitted them to the RA National Assembly for adoption. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice | Corruption Prevention Commission (upon consent) RA Ministry of Territorial Administration and Infrastructure |
| The scope of declarant officials includes officials in state and local self-government bodies, which leads to a lack of accountability and transparency of persons holding leadership positions in organizations with state or community participation.  The Law on Public Service does not stipulate some declarant officials to submit a declaration of interests. | II | I | II | |  | |  |
|  |  | 1. Legislative amendments have expanded the scope of declarant officials to include:  a) Individuals holding leadership positions in state and community bodies. For this group, specific financial and economic criteria is defined, with revised regulations for submitting a situational declaration.  b) Officials holding other positions with risk exposure.  2. Legislative amendments have established a mandatory requirement for all public officials to submit a declaration of interests. | | The drafts are submitted to the RA Government and approved. | |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 1.11.**  Develop the electronic platform for declarations. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | 2025 | | 2026 | | 1. Technical solutions for the development of the electronic declaration system are provided.  2. The interoperability of the electronic systems and databases used by the CPC and other bodies has been ensured. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | Corruption Prevention Commission (upon consent) | Ministry of High-Tech IndustryState Revenue Committee (upon consent) RA Ministry of Justice |
| The functionalities of the current system fail to provide interoperability with all state databases (some data in the databases do not meet the system’s quality requirements), internal and external accountability, sample search of published data, and automated export of machine-readable data.  The current system does not provide options for electronic automated notification, and there are no relevant legal regulations. | II | I | II |  | |  | |
|  |  |  | 1. The following processes are ensured:  ongoing improvement of the new electronic declaration system; automated declaration analysis to eliminate selective approach and human bias; automated identification of all cases of submitting declarations that violate the requirements for filling out the form or the order of submission, as well as any instances of accidentally wrong or incomplete data; detection of red flags through risk-based indicators and automated analysis of declarations to the possible broadest extent; and the submission of identified corruption risks and potential illicit enrichment cases to the RA Prosecutor General's Office.  2. Interoperability with all state databases, internal and external accountability, sample search of public data, and automated export of machine-readable data are in place. The transfer and input of the individual's data in the electronic declaration system is ensured once he/she takes an office subject to presenting declaration. | | 1. The implementation of the universal income declaration system provides an automatic exchange of identical data between electronic systems used by the SRC and CPC. The state body databases are synchronized with the data to be declared, and missing data that required declaration are added to the databases.  2. The automated notification option has reduced the number of declarations that missed the deadlines set by law. | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |

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| **Activity 1.12.**  Expand the scope of officials required to undergo integrity checks. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | 2025 | | 2026 | 1. The RA Government has approved the amendments to the Law on Public Service and other related legal acts and submitted them to the RA National Assembly for adoption.  2. Integrity checks have been conducted on public officials with extensive powers and the autonomy in decision-making. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice | Corruption Prevention Commission (upon consent)  Civil Service Bureau of the RA Prime Minister’s Office (upon consent) |
| Currently, integrity checks are limited to certain public officers, and there is no legal mandate to conduct integrity checks on officials with extensive powers and the autonomy in decision-making. This issue is emphasized both by international organizations (e.g. GRECO's 5th Evaluation Round) and by the national social surveys that provide insights into high-risk positions and processes. | II | | I | II |  | |  |
|  | |  |  | Draft amendments to the legislation are developed to expand the scope of officials subject to integrity checks according to the PTEFs scope in GRECO's 5th Evaluation Round. | | The drafts have been presented to and approved by the RA Government. |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 1.13.**  Specify differences between the integrity check conducted at the appointment or promotion in public office and the ongoing integrity check (including the respective framework and mechanisms). | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | 2026 | 1. The RA Government has approved the amendments to the Law on Public Service, the Law on Corruption Prevention Commission, and other related legal acts, and submitted them to the RA National Assembly for adoption.  2. Ongoing integrity checks are conducted for public officials. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice | Corruption Prevention Commission (upon consent) |
| Integrity checks are currently conducted at the appointment or promotion of the officials. However, ongoing integrity checks are not enforced. | II | I | | II |  | |  |
|  | 1. The list of public officials whose integrity check is not entrusted to the CPC and the procedure of integrity check in the respective agency are revised.  2. Adequate and effective mechanisms for integrity checks in state and local self-government bodies, as well as in enterprises with state participation have been chosen. | | Draft amendments to the legislation are developed to clarify the scope of the current integrity checks, the checking authorities, and the implementation mechanisms. | The drafts are approved by the RA Government and submitted to the RA National Assembly for adoption. | |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 1.14.**  Improve the accountability of the body responsible for appointing officials based on the CPC's integrity check conclusions. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | 2025 | 2026 | 1. The RA Government has approved the amendments to the Law on Public Service, the Law on Corruption Prevention Commission, and other related legal acts, and submitted them to the RA National Assembly for adoption.  2. Due justification is provided in case the conclusions of the CPC are not considered when making an appointment. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice  ; | Corruption Prevention Commission (upon consent) |
| Currently, the appointment or promotion of officials is done regardless of the positive or negative conclusion on integrity received from the CPC. It is not clear what criteria are taken into account with regard to the CPC's conclusions when appointing an official. | II | | I | II | |  |  |
|  | | International best practices in integrity check standards are studied with consideration of domestic needs (regarding the appointment, promotion, and integrity checks of public officials with extensive powers and the authority for independent decision-making). | 1. Based on international best practices in integrity check standards, legislative amendments are developed to introduce written/verbal exercises to assess the integrity of candidates in competitive processes of recruitment or promotion. Criteria are introduced for integrity check on candidates for public office or promotion.  In the event of the CPC's negative conclusion on the candidate's integrity, his/her appointment or promotion to the relevant position shall be based on the duly justified decision.  2. The drafts are approved by the RA Government and submitted to the RA National Assembly for adoption. | |  | Monitoring is conducted in the bodies responsible for appointing officials based on the CPC's conclusions. |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 1.15.**  Introduce a requirement on publishing the final part of the integrity check conclusion by the CPC. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | 2025 | | 2026 | 1. The RA Government has approved the amendments to the Law on Public Service, the Law on Corruption Prevention Commission, and other related legal acts, and submitted them to the RA National Assembly for adoption.  2. The results of integrity checks are accessible on the CPC website. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice | Corruption Prevention Commission (upon consent) |
| The lack of publicity of the integrity check results hinders strengthening the integrity system through public control mechanisms. | II | | I | II |  | |  |
|  | | The necessity of publicizing the final part of the CPC's conclusion on integrity check is explored; international best practices in integrity check standards are studied with consideration of domestic needs. | 1. Legislative amendments are developed as needed based on the results of studying the necessity of publishing the final part of the conclusion on integrity check by the CPC.  2. The drafts are approved by the RA Government and submitted to the RA National Assembly for adoption. |  | |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 1.16.**  Improve the effectiveness of the integrity check system. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | 2025 | | 2026 | 1. The RA Government has approved the amendments to the Law on Corruption Prevention Commission and other related legal acts, and submitted them to the RA National Assembly for adoption.  2. A special electronic platform for integrity check is developed. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | Corruption Prevention Commission (upon consent) | RA Ministry of High-Tech Industry  RA Ministry of Justice |
| The limitations in CPC's resources reduce the effectiveness of integrity checks. | II | | I | II |  | |  |
|  | | Draft legislative amendments are developed to create a special electronic platform for integrity check, outline its usage procedure, and regulate the cases and parameters of applying of other digital tools during integrity checks. | The drafts are approved by the RA Government and submitted to the RA National Assembly for adoption. | 1. A special electronic platform for integrity check is created to facilitate automated data download, reliability verification, as well as drafting conclusions and integrity checks by artificial intelligence following the current practices.  2. The effective use of the CPC's resources is ensured through the automated filtering of candidates that need integrity test checking. | |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |

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| **Activity 1.17.**  Improve the effectiveness of mechanisms for control over the financial activities of political parties. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | 2025 | | 2026 | | The RA Government has approved the amendments to the Law on Political Parties, the Law on Corruption Prevention Commission, the Electoral Code, the RA Code on Administrative Offenses, the RA Criminal Procedure Code, the RA Criminal Code, and other related legal acts, and submitted them to the RA National Assembly for adoption. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice | Corruption Prevention Commission (upon consent)  Central Electoral Commission (upon consent)  Civil society organizations (upon consent) |
| Currently, there are no mechanisms in place for financial control over political parties, including legislative regulations on party donations and their thresholds, provisions for administrative and criminal liability, and ensuring proper record-keeping of data subject to state registration. The mechanisms (methods for ongoing verification, cooperation with other bodies) and the potential for fully implementing these functions are lacking. | II | I | II |  | |  | |
|  |  | Draft legislative amendments are developed to establish: (1) methods and procedures for cooperation between the CPC and the CEC, as well as the CPC and the Anti-Corruption Committee; (2) tools and procedures for the CPC's ongoing financial control over political parties; and (3) regulations on various issues related to the proper implementation of the CPC's functions. | The drafts are approved by the RA Government and submitted to the RA National Assembly for adoption. | |  | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **CONTINUOUS IMPROVEMENT OF THE INTEGRITY SYSTEM** | | | | | | | | | | |
| **Activity 1.18.**  Improve the codes of conduct and the mechanisms of their implementation in state and local self-government bodies, following the guidelines approved by the CPC. | Baseline Data | Performance Targets | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | 2026 | The RA Government has approved the amendments to the Law on Public Service, the Law on Corruption Prevention Commission, the Law on Guarantees of Activities of a Deputy of the National Assembly, and other related legal acts, and submitted them to the RA National Assembly for adoption. | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | Corruption Prevention Commission (upon consent) | RA Ministry of Territorial Administration and Infrastructure  RA Ministry of Justice  Civil Service Bureau of the RA Prime Minister’s Office (upon consent) |
| Currently, there are no established rules of conduct for specific state and community positions, and the existing rules lack uniformity. Furthermore, there is often no proper control over the implementation of these rules. | II | I | II | |  |  |
|  | Legislative amendments are developed to ensure that uniform rules of conduct and standardized liability measures in case of violating these rules are applied in the state and local self-government bodies and organizations with state participation.  The drafts are approved by the RA Government and submitted to the RA National Assembly for adoption. | The development, approval, and step-by-step implementation of the sectoral codes of conduct for public officials and public and community servants ensures adherence to the standard rules of conduct for public servants. Specifically, the following items are developed:  1.1. Guidelines on the implementation of the sectoral codes of conduct for public servants;  1.2. Explanatory notes on the principles and rules of conduct for public officials and public servants;  1.3. Codes of conduct for government officials (except MPs, judges, members of the Supreme Judicial Council, prosecutors, and investigators), heads of communities, their deputies, heads of administrative districts of the Yerevan community and their deputies; code of conduct for the members of parliament;  1.4. The existing rules of conduct (ethics) for judges and prosecutors aligned with the standard rules of conduct for public servants with consideration of the sectoral specifics;  1.5. The rules of conduct based on the principles of conduct for the members of community councils, heads of administrative districts, and persons occupying discretionary municipal offices;  1.6. The bodies authorized to approve legislative regulations on the development of codes of conduct for the members of community councils, the head of the administrative district, and persons occupying discretionary municipal offices;  1.7. Codes of conduct for public (state and community) servants considering the sectoral specifics; the bodies authorized to oversee the approval and adherence of codes of conduct and the scope of their functions. | |  |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |

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| **Activity 1․19.**  Ensure the implementation of the new definition of conflict of interest. | Baseline Data | Performance Targets | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | | | | | 2025 | | | 2026 | The RA Government has approved the package of legislative amendments and other relevant legal acts, and submitted them to the RA National Assembly for adoption. | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice  Corruption Prevention Commission (upon consent) | The Supreme Judicial Council of RA (upon consent)  RA Ministry of Territorial Administration and Infrastructure  Corruption Prevention Commission (upon consent)  Civil Service Bureau of the RA Prime Minister’s Office (upon consent) |
| The definition of conflict of interest was modified but the respective amendments in other laws were not made. | II | I | | | | | II | | |  | | |  |
|  | Draft legislative amendments are developed to align the guidelines for judges, MPs, members of community councils, and specific sectors of the public service established by relevant sectoral laws with the new definition of conflict of interest. | | | | | The amendments are approved by the RA Government and submitted to the RA National Assembly for adoption. | | |  | | |  |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 1.20.**  Develop mechanisms for enforcing gift acceptance restrictions. | Baseline Data | Performance Targets | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | | 2024 | | | | | | | 2025 | | 2026 | 1. The RA Government has approved the amendments and additions to the Law on State Property Management, the Law on Public Service, and other related legal acts, and submitted them to the RA National Assembly for adoption.  2. The Government decisions have established guidelines for managing gifts that have become state property; the list of perishable property and property that require significant maintenance costs; the cases and procedure of utilization of perishable property and managing the proceeds; the details for handling specific types of property; a methodology for choosing the appropriate method of handling; and regulations for providing a conclusion on the selected method of handling.  3. The register of gifts is established and functioning. | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice  Corruption Prevention Commission (upon consent) |  |
| There are no mechanisms in place for managing gifts received by public servants and public officials and deemed as state property; the gift registration mechanisms are still incomplete; and the gift register has not been established yet. | II | | | I | | | | II | | |  | |  |
| The package of draft laws is developed, approved by the Government, and submitted to the National Assembly for adoption. As a result:  1. Predictable, clear, and effective regulations for managing gifts that are transferred to the state property have been established.  2. In certain cases, the authority to present a conclusion on the method of accounting and managing ceremonial gifts is assigned to the State Ceremonial Service.  3. The possibility of retention and use of ceremonial gifts that become state property within the given state body is defined.  4. Gifts of cultural significance are allowed to be donated to museums or the National Library.  5. The management practices for particular kinds of ceremonial gifts (perishable property, animals, etc.) are specified. As necessary, it will be possible to sell ceremonial gifts and direct the proceeds to charity.  6. Expensive gifts and weapons given as rewards are included in the scope of permissible gifts in the cases defined by the law.  7. The methods for selling non-permissible gifts by the State Property Management Committee and managing the proceeds are established. | | | By-laws have been adopted to enforce regulations on managing gifts received by public servants and public officials and deemed to be state property. | | | | The establishment of the register of gifts, along with other related activities mandated by Article 30, Part 4 of the Law on Public Service, has been completed. | | |  | |  |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 1.21.**  Enhance the tools for identifying and monitoring incompatibility requirements. | Baseline Data | Performance Targets | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | | | | | 2025 | | | 2026 | The RA Government has approved the amendments to the Law on Public Service and other related legal acts and submitted them to the RA National Assembly for adoption. | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | Corruption Prevention Commission (upon consent) | RA Ministry of Justice  Civil society organizations (upon consent)  Civil Service Bureau of the RA Prime Minister’s Office (upon consent) |
| The permissible scope of scientific, educational, and creative activities, as well as work in other fields for individuals holding public positions (particularly political officials) and those in the leadership (top and high) positions of public service is not explored. | II | I | | | | | II | | |  | | |  |
|  | In line with international practices:  1. Mechanisms are established to prevent individuals holding public positions (particularly political officials) and those in the leadership (top and high) positions of public service from occupying executive or managerial positions in non-profit organizations, as well as receiving full-time salaries from commercial and non-commercial organizations engaged in scientific, educational, and creative activities;  2. The scope of scientific, educational, and creative activities is clarified in accordance with respective areas of activities, including definition of the list of organizations and activity types relevant to each category. | | | | | 1. Based on the international experience, provisions are defined to govern the engagement of public officials and servants in another paid work or off-hour job in healthcare, sports, journalism, and other humanitarian fields. Furthermore, mechanisms are introduced for overseeing such activities.  2. The international experience of transferring property of public officers and public servants to trust management is studied with consideration of domestic needs (possible options: improving the current mechanisms or introducing new mechanisms).  3. As a result of the study, in case the current mechanisms are preserved, adopt legislation to establish a register for registration and accounting of contracts for the transfer of public officers’ and public servants’ property to trust management and to define the procedure for register’s maintenance. | | | 1. The draft legal acts are developed and approved.  2. Due to the electronic registers' interoperability, the process of acquiring details regarding public officials' potential/actual engagement in any private entity is facilitated. | | |  |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 1.22.**  Clarify the requirements for "other restrictions" in the legislation. | Baseline Data | Performance Targets | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | 2025 | | | 2026 | | The RA Government has approved the amendments to the Law on Public Service and other related legal acts and submitted them to the RA National Assembly for adoption. | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice  Corruption Prevention Commission (upon consent)  Civil Service Bureau of the RA Prime Minister’s Office (upon consent) | Civil society organizations (upon consent) |
| The specific details of "other restrictions" are not clearly defined or regulated in some areas of public service. | II | | I | | II | | | |  | | |  | |
|  | |  | |  | | | | 1. Draft legal acts are developed to define specific features of "other restrictions" for certain areas of public service.  2. For each category of "other restrictions," the legislation provides a separate article defining the scope of specific restrictions for public officials and servants, outlining the requirements and conditions for implementing these restrictions, delineating the scope of officials and bodies responsible for their enforcement, as well as the tools and structures for overseeing compliance.  3. The legislation provides mechanisms for invalidating employment or other contracts concluded in violation of post-employment restrictions. | | | Draft laws are approved by the RA Government and submitted to the RA National Assembly for adoption. | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 1.23.**  Introduce regulations on lobbying activities (undue influence). | Baseline Data | Performance Targets | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | | | | | 2025 | | | 2026 | The RA Government has approved the package of legislative amendments and submitted them to the RA National Assembly for adoption. | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Justice | Corruption Prevention Commission (upon consent)  Civil society organizations (upon consent) |
| Currently, there are no regulations on lobbying activities. | II | I | | | | | II | | |  | | |  |
|  | The international best practices on lobbying regulations are studied following Armenia's international obligations. | | | | | Guidelines governing the transparency of lobbying activities are developed in accordance with the best international practices. | | | Regulations on lobbying activities are incorporated in various legal acts to define rules of interaction with lobbyists and other third parties seeking influence on the legislative process and ensure their transparency. | | |  |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 1.24.**  Establish provisions to prevent public officials and public servants from using material-technical, financial, and information resources, as well as other state and (or) community property and operational information for non-official or personal purposes. | Baseline Data | Performance Targets | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | | | | 2025 | | | 2026 | | The RA Government has approved the amendments to the Law on Public Service and other related legal acts and submitted them to the RA National Assembly for adoption. | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | Corruption Prevention Commission (upon consent)  RA Ministry of Justice  Civil Service Bureau of the RA Prime Minister’s Office (upon consent) | Civil society organizations (upon consent) |
| The restrictions on using material-technical, financial, and information resources, other state and (or) community property, and operational information for non-official purposes by individuals holding public positions and public servants are not defined. | II | I | | | | II | | |  | | |  | |
|  |  | | | |  | | | Legal acts are drafted to define the tools, procedures and oversight mechanisms for the restrictions on using material-technical, financial, and information resources, other state and (or) community property, and operational information for non-official or personal purposes by individuals holding public positions and public servants, as well as for enforcing these provisions. | | | Draft laws are approved by the RA Government and submitted to the RA National Assembly for adoption. | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |

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| **Activity 1.25.**  Introduce a unified system to enforce liability for violations of integrity system components. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | | 2025 | 2026 | The RA Government has approved the amendments to the Law on Public Service and other related legal acts and submitted them to the RA National Assembly for adoption. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | Corruption Prevention Commission (upon consent)  Civil Service Bureau of the RA Prime Minister’s Office (upon consent) | RA Ministry of Justice |
| Currently, there is no unified system to enforce liability for violations of integrity system components. Various bodies apply diverse practices. | II | I | | II | | |  |  |
|  | The issues related to the existing mechanisms to enforce liability for violations of integrity system elements are identified. | | Based on the identified issues, draft legal acts are developed to establish comprehensive mechanisms defining liability for violations of integrity system components by the individuals holding public positions and public servants, which include unified and clear sanctions for all entities. | | | Draft laws are submitted to the RA Government and approved. |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | |
| **Activity 1.26.**  Establish a mandatory requirement for enforcing liability measures for persons occupying specific positions. | Baseline Data | Performance Targets | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co- Implementing Body |
| 2023 | | 2024 | | | 2025 | | 2026 | 1. The RA Government has approved the amendments to the Law on Public Service and other related legal acts and submitted them to the RA National Assembly for adoption.  2. Disciplinary liability is established for persons holding political, administrative, and discretionary positions. | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Ministry of Justice  Corruption Prevention Commission (upon consent) | Civil Service Bureau of the RA Prime Minister’s Office (upon consent)  National Security Service of the Republic of Armenia |
| Legal provisions on disciplinary sanctions for violations of rules of conduct, other restrictions, and conflict of interest rules do not apply to persons holding political offices. Thus, respective violations by these officials do not bear legal consequences, failing to discourage similar behavior by political officials, and in the absence of accountability, such cases are not prevented. | II | | I | | II |  | |  |
|  | |  | |  | Draft legal acts are developed to establish a mandatory requirement to apply sanctions for the following groups of officials in case of violating integrity components:  1. Individuals occupying political offices, including deputies of the National Assembly, government officials, and individuals holding political positions in municipal bodies;  2. Individuals holding discretionary and administrative positions;  3. Public officials serving in specific sectors (municipal, diplomatic, police, military, and national security) in accordance with the sectoral regulations. | | Draft laws are approved by the RA Government and submitted to the RA National Assembly for adoption. |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | |

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| **STRATEGIC GOAL 2: IMPROVING LEGAL AND INSTITUTIONAL SYSTEMS FOR COMBATING CORRUPTION** | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **EXPECTED RESULTS** | 1. **The procedure of forming the Anti-Corruption Committee is revised and 80% of the Committee's positions are filled.** 2. **Electronic tools used by anti-corruption bodies are enhanced and modernized and new electronic tools are introduced.** 3. **Anti-corruption law enforcement agencies have implemented trainings/educational programs, and by the end of 2025, at least 60% of prosecutors are trained.** 4. **A comprehensive methodology and guidelines to detect and investigate corruption crimes are developed, along with methodological guidelines for specialized anti-corruption courts and judges to investigate specific corruption crimes and cases on the confiscation of property of illicit origin.** 5. **A unified procedure for maintaining statistics on corruption crimes is developed.** 6. **Experts in economics, finance, and other relevant fields are involved in the activities of all anti-corruption law enforcement agencies and anti-corruption courts.** 7. **At least 50% of judges of anti-corruption courts and 80% of judges in other courts are trained on the topics of preventing and combating corruption.** 8. **The institute for the confiscation of property of illicit origin is improved; the methodology and guidelines for the confiscation of illicit assets are developed and applied; and the mechanisms of mutual assistance in this area are expanded and modernized.** 9. **The system of whistleblowing is enhanced and modernized.** 10. **Standard and mandatory regulations for whistleblowing statistics are introduced; the scope of entities responsible for maintaining statistics is expanded; and the statistical data presents clear and reliable information as specified by legislation.** 11. **Mechanisms are in place to ensure impartial and justified whistleblowing proceedings and effective protection of whistleblowers’ rights.** | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **EXPECTED IMPACT** | * **The independence, autonomy, and accountability of the Anti-Corruption Committee is ensured.** * **A unified and predictable policy for detecting and investigating corruption crimes and judicial investigation of corruption cases is ensured.** * **The effectiveness, transparency, professionalism, and specialization of anti-corruption bodies and anti-corruption courts have steadily improved over the years as compared to 2022 data.** * **Public trust towards anti-corruption bodies and anti-corruption courts has steadily improved over the years as compared to 2022 data.** * **Public trust towards the whistleblowing system has steadily improved over the years as compared to the 2022 data and research.** * **By the end of 2026, the number of whistleblowing reports has increased by at least 25% as compared to the 2022 data and research.** | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **INSTITUTIONAL STRENGTHENING OF ANTI-CORRUPTION LAW ENFORCEMENT BODIES** | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.1.**  Review the procedure for the Anti-Corruption Committee formation. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | | 2025 | | | 2026 | | 1. The RA Government has approved the package of amendments to the Law on the Anti-Corruption Committee, the Constitutional Law on Rules of Procedure of the National Assembly, and related legal acts, and submitted them to the RA National Assembly for adoption.  2. The procedure for the formation of the Anti-Corruption Committee has been revised and the new members have been appointed according to the new procedure. | | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Ministry of Justice | | The Corruption Prevention Commission (upon consent) |
| The Chairman of the Anti-Corruption Committee is appointed by the Government, with no guarantees of full accountability to the National Assembly. Moreover, the process of selecting the Committee Chairman does not ensure an impartial and effective election.  Deputies of the Anti-Corruption Committee Chairman are appointed by the Prime Minister. | II | | | | | I | | | | II | | | |  | | |  | |
|  | | | | |  | | | | The guarantees for the independence of the Anti-Corruption Committee, in particular, possible changes in the procedure for the appointment of the Chairman and his/her deputies are studied. As a result, possibilities of strengthening the mechanisms of appointment/dismissal of these officials and the guarantees of their independence are considered. | | | | Amendments to the Law on the Anti-Corruption Committee, the Constitutional Law on Rules of Procedure of the National Assembly, and related legal acts are drafted to strengthen the independence safeguards for the Anti-Corruption Committee through changes in its formation approach, specifically revising the procedure of appointing the Committee's Chairman and his/her deputies. | | | Draft laws are presented to the RA Government and approved. | |
| **Source of funding** |  | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.2.**  Ensure the institutional strengthening of the Anti-Corruption Committee. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | | 2025 | | | 2026 | | 80% of the Anti-Corruption Committee's staff has been completed. | | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | The Anti-Corruption Committee (upon consent) | |  |
| The staff of the investigative and operational intelligence services of the Anti-Corruption Committee is not fully recruited. | II | | | | | I | | | | II | | | |  | | |  | |
|  | | | | | Competitions are announced and held  to recruit staff for the Anti-Corruption Committee. | | | | Competitions are announced and held  to recruit staff for the Anti-Corruption Committee. | | | | Competitions are announced and held  to recruit staff for the Anti-Corruption Committee. | | | At least 80% of the Anti-Corruption Committee's staff is completed. | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.3.**  Implement measures to digitize the activities of the Anti-Corruption Committee, as well as the Department for the Control over the Legality of Pre-Trial Proceedings and Department for the Confiscation of Property of Illicit Origin under the RA Anti-Corruption Committee of the RA Prosecutor General’s Office. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | | Co-Implementing Body | |
| The Anti-Corruption Committee's digitalization needs are not assessed. There are no modern technological solutions available for operational intelligence activities, and the investigative bodies are not provided with access to other institutions’ databases.  Interoperability of electronic systems with other institutions is not ensured. | 2023 | | | | 2024 | | | | | | | 2025 | | | 2026 | | | | | | 1. Digitization needs have been assessed.  2. Existing electronic tools are upgraded and modernized, or new electronic tools are introduced.  3. Interoperability between electronic systems is ensured. | Functional electronic tools  Semi-annual and annual monitoring reports  Press releases  Media publications | The Anti-Corruption Committee (upon consent)  RA Prosecutor General’s Office (upon consent) | | RA Ministry of Justice  RA Ministry of High-Tech Industry | |
| II | | | | I | | | II | | | |  | | |  | | | | | |
|  | | | |  | | |  | | | | Digitalization needs are assessed for the Anti-Corruption Committee, as well as for the Department for the Control over the Legality of Pre-Trial Proceedings and Department for the Confiscation of Property of Illicit Origin under the RA Anti-Corruption Committee of the RA Prosecutor General’s Office. | | | 1. Based on the needs assessment, evaluation of the scope of technical assistance, collaboration with donors, and coordinated implementation is conducted.  2. The existing electronic tools are modernized.  3. Technological solutions for operational intelligence activities are developed and implemented; investigative bodies are provided with access to other institutions’ databases.  4. Interoperability of electronic systems with other institutions is ensured. | | | | | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.4.**  Conduct professional anti-corruption educational courses and trainings for the investigators of the Anti-Corruption Committee, the prosecutors of the Department for the Control over the Legality of Pre-Trial Proceedings and Department for the Confiscation of Property of Illicit Origin under the RA Anti-Corruption Committee of the RA Prosecutor General’s Office. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | | 2025 | | | 2026 | | 1. Trainings and educational courses have been introduced and are implemented in the anti-corruption law enforcement bodies.  2. By the end of 2025, at least 90% of the investigators of the Anti-Corruption Committee and the prosecutors of the Department for the Control over the Legality of Pre-Trial Proceedings and Department for the Confiscation of Property of Illicit Origin under the RA Anti-Corruption Committee of the RA Prosecutor General’s Office passed training. As a result of the knowledge post-test, the trainees demonstrated at least 90% knowledge proficiency. | | | Available terms of reference and curricula  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Semi-annual and annual monitoring reports  Press releases  Media publications | | The Anti-Corruption Committee (upon consent)  RA Prosecutor General’s Office (upon consent)  RA Academy of Justice | | RA Ministry of Justice |
| Anti-corruption law enforcement agencies are not provided with anti-corruption educational courses and trainings. | II | | | | | I | | | | II | | | |  | | |  | |
|  | | | | | The topics and modules, curricula and methodology, as well as target audience of anti-corruption training/educational courses that include topics on the detection and investigation of corruption crimes are approved. | | | | Anti-corruption training and educational courses that include topics on the detection and investigation of corruption crimes have been conducted among 30% of all target groups. | | | | Anti-corruption training and educational courses that include topics on the detection and investigation of corruption crimes have been conducted among 60% of all target groups. | | | Anti-corruption training and educational courses that include topics on the detection and investigation of corruption crimes have been conducted among 90% of all target groups. | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.5.**  Review the scope of corruption-related crimes and the jurisdiction for their investigation. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | 2025 | | | 2026 | | | The RA Government has approved the package of amendments to the RA Criminal Code and RA Criminal Procedure and submitted them to the RA National Assembly for adoption. | | | Available legal acts  Study of international experience  Public consultations  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Ministry of Justice | | The Anti-Corruption Committee (upon consent)  RA Prosecutor General’s Office (upon consent)  RA Investigative Committee (upon consent) |
| As a result of implementing the Anti-Corruption Strategy for 2019-2022, the scope of corruption crimes has been clarified. However, various concerns have been raised recently regarding the list of corruption crimes and their investigation jurisdiction. Specifically, the criteria to differentiate between corruption and non-corruption crimes, as well as the exhaustiveness of the list of corruption crimes remain unclear. | II | | | | | I | | | | II | | |  | | |  | | |
|  | | | | |  | | | |  | | | The list of corruption crimes and their investigation jurisdiction are revised based on international experience and standards. | | | Legislative drafts are developed to revise the list of corruption crimes and adjust the investigative jurisdiction accordingly. The drafts are submitted to the RA Government and approved by the Government decision. | | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.6.**  Develop a comprehensive methodology and guidelines for detecting and investigating corruption crimes. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | | 2025 | | | 2026 | | A comprehensive methodology and guidelines for detecting and investigating corruption crimes have been developed and distributed among relevant law enforcement bodies. | | | Available guidelines and standardized methodology  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Prosecutor General s Office (upon consent)  The Anti-Corruption Committee (upon consent) | | RA Ministry of Justice  RA Academy of Justice (upon consent) |
| Currently, there is no established methodology or guidelines to ensure efficient and harmonized detection and investigation of corruption crimes throughout the entire process starting from the pre-trial stage up to the stage of judicial examination. | II | | | | | I | | II | | | | | |  | | |  | |
|  | | | | |  | | 1. A comprehensive methodology and guidelines for detecting and investigating corruption crimes are developed covering the entire criminal proceedings process, starting from the pre-trial stage up to the stage of judicial examination.  2. The methodology and guidelines are provided to the relevant authorities for inclusion in training materials. | | | | | |  | | |  | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.7.**  Involve experts in economics, finance, and other necessary fields in the operations of anti-corruption law enforcement bodies. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | | 2025 | | | 2026 | | 1. The needs to involve financial experts in anti-corruption law enforcement bodies has been assessed.  2. Experts in economics, finance, and other fields are involved in the activities of all anti-corruption law enforcement bodies. | | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | The Anti-Corruption Committee (upon consent)  RA Prosecutor General’s Office (upon consent) | | RA Ministry of Justice |
| The activities of anti-corruption law enforcement bodies assume examination of various financial issues, relevant calculations and analyses. Meanwhile, there is no legal and practical possibility to engage field experts in the work of these bodies. | II | | | | | I | | | | II | | | |  | | |  | |
|  | | | | | The need to include experts in economics, finance, and other fields in anti-corruption law enforcement bodies is assessed. | | | | Based on need, efforts are made to involve experts in the work of the law enforcement agencies. | | | | Based on need, efforts are made to involve experts in the work of the law enforcement agencies. | | |  | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **INSTITUTIONAL STRENGTHENING OF ANTI-CORRUPTION COURTS** | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.8.**  Conduct trainings for judges of anti-corruption courts. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | 2024 | | | | | | | | | | | 2025 | | | 2026 | | 1. The training programs for judges of anti-corruption courts and educational programs for judicial candidates are revised.  2. The programs have incorporated the current international standards and include modules covering the specifics of investigating corruption cases.  3. By the end of 2026, at least 90% of anti-corruption courts’ judges have passed trainings. | | | Training and educational curricula  Training reports  Knowledge assessment reports and employee surveys  Press releases  Media publications | | RA Ministry of Justice  RA Academy of Justice (upon consent) | | Committee on Educational Issues of the General Assembly of Judges (upon consent)  The Supreme Judicial Council (upon consent) |
| To meet international anti-corruption commitments and strengthen anti-corruption institutions, it is crucial to continuously develop the institutional capacities of anti-corruption courts. This can be achieved through high-level professional training for judges examining relevant cases, conducting regular ongoing training focused on the specifics of corruption cases, including the current international standards, and by other means. | II | | I | | | | | | | II | | | |  | | |  | |
|  | | The training programs for judges of the specialized Anti-Corruption Court, judges of the Court of Appeals who examine corruption cases, and judges of the future Anti-Corruption Court of Cassation and Anti-Corruption Chamber of the Court of Appeals, as well as the educational courses for judicial candidates are revised to incorporate the specifics of investigating corruption cases and existing international standards. | | | | | | | At least 30% of anti-corruption courts’ judges have passed training after the program's approval. | | | | At least 70% of anti-corruption courts’ judges have passed training. | | | At least 90% of anti-corruption courts’ judges have passed training. | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.9.**  Develop methodological guidelines for specialized anti-corruption courts and judges to handle specific cases of confiscating illicit assets and investigating corruption crimes. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | | 2025 | | | 2026 | | Methodological guidelines have been developed for specialized anti-corruption courts and judges to handle specific cases of confiscating illicit assets and investigating corruption crimes. | | | Available guidelines  Semi-annual and annual monitoring reports  Press releases  Media publications | | The Supreme Judicial Council (upon consent) | | RA Ministry of Justice  Civil society organizations (upon consent) |
| There are no methodological guidelines for specialized anti-corruption courts and judges to handle specific cases of confiscating illicit assets and investigating corruption crimes. | II | | | | | I | | | | II | | | |  | | |  | |
|  | | | | |  | | | |  | | | | A draft guide is developed to address the specific cases of confiscating illicit assets and investigating corruption crimes. | | | The guide is provided to competent authorities and published on the official website of the Ministry of Justice. | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.10.**  Involve experts in economics and other required fields in the work of anti-corruption courts. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | 2024 | | | | | | | | | | 2025 | | | 2026 | | 1. The need to involve financial experts in anti-corruption courts has been assessed.  2. Experts in economics, finance, and other related fields have been involved in the work of all anti-corruption courts. | | | Semi-annual and annual monitoring reports  Press releases  Media publications | | The Supreme Judicial Council (upon consent) | | RA Ministry of Justice |
| A considerable number of cases investigated by specialized anti-corruption bodies involve illegal transfer, conversion, and legalization of funds. Judges investigating corruption cases need ongoing professional support in dealing with these matters. | II | | | I | | | | | | II | | | |  | | |  | |
|  | | | 1. The need to involve experts in economics and other related fields in anti-corruption courts is assessed.  2. Based on need, experts are involved in the work of anti-corruption courts. | | | | | | Experts in economics, finance, and other related fields are involved in anti-corruption courts. | | | | Experts in economics, finance, and other related fields are involved in anti-corruption courts. | | |  | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.11.**  Establish a unified corruption crime statistics system and upgrade current mechanisms. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | | 2025 | | | 2026 | | 1. A standardized procedure for corruption crime statistics is developed, covering the stages of pre-trial investigation and judicial examination.  2. Software/technical solutions have been implemented. | | | Functional electronic tools  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Anti-Corruption Committee (upon consent)  RA Prosecutor General’s Office (upon consent)  The Supreme Judicial Council (upon consent) | | RA Ministry of Justice  RA Ministry of High-Tech Industry |
| In the context of international anti-corruption obligations, the absence of separate statistical data on corruption leads to the assessment of the obligation as unfulfilled. It is particularly problematic that the statistical data related to the judicial examination stage is incomplete and incomparable with the statistical data collected at the stage of pre-trial criminal proceedings. | II | | | | | I | | | | II | | | |  | | |  | |
|  | | | | |  | | | | A standardized procedure to keep corruption crime statistics is developed, covering the stages of pre-trial investigation and judicial examination. | | | | Legal basis and software/technical solutions are provided for corruption crime statistics. | | | Electronic system for statistics management is introduced. | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **ANTI-CORRUPTION MEASURES IN THE JUDICIAL SYSTEM** | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.12.**  Incorporate topics on preventing and combating corruption in the education and training programs for judges and judicial candidates. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | | 2025 | | | 2026 | | 1. The training programs for judges and judicial candidates have been revised.  2. Modules for preventing and fighting corruption have been incorporated in the programs.  3. By the end of 2026, at least 90% of judicial candidates have been trained. | | | Training and educational programs  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Academy of Justice  The Supreme Judicial Council (upon consent) | | RA Ministry of Justice  Corruption Prevention Commission (upon consent)  Committee on Educational Issues of the General Assembly of Judges (upon consent) |
| There are no regular trainings on the specified topics. | II | | | | | I | | | | | II | | |  | | |  | |
|  | | | | | The training programs for judges and educational courses for judicial candidates are revised to include topics related to preventing and combating corruption. | | | | | The programs are approved and at least 30% of judicial candidates are trained. | | | At least 60% of judicial candidates are trained. | | | At least 90% of court judges are trained. | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **IMPROVING MECHANISMS FOR THE RECOVERY AND MANAGEMENT OF CORRUPTION PROCEEDS AND PROPERTY OF ILLICIT ORIGIN** | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.13.**  Improve and modernize the institute of confiscating property of illicit origin. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | | 2025 | | | 2026 | | 1. The RA Government has approved the package of amendments to the Law on the Confiscation of Property of Illicit Origin and other related acts and submitted them to the RA National Assembly for adoption.  2. The integrated platform has been launched. | | | Available legal acts  Functional electronic tools  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Prosecutor General’s Office (upon consent) | | RA Ministry of Justice  RA Ministry of High-Tech Industry |
| A number of issues are identified regarding the institute of confiscating property of illicit origin. | II | | | | | I | | | II | | | | |  | | |  | |
|  | | | | |  | | | Considering the international experience, needs to improve and modernize this institution are studied, covering the governing body and the model for confiscated property management, a platform for regular and secure information exchange between investigative and prosecutorial bodies, and creation of a database of assets transferred to state management. | | | | | Based on the identified issues, draft legislative amendments are developed to improve the framework related to the governing body and the model for confiscated property management. | | | A new integrated platform is launched to facilitate regular and secure information exchange between intelligence units, investigative and prosecutorial bodies, and asset recovery specialists. The platform also provides access to the databases of other state bodies. | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.14.**  Enhance the mechanisms of managing the property that was confiscated as a result of levying an attachment and (or) seizing assets of corruption crimes and through the proceedings on the confiscation of the property of illicit origin. | Baseline Data | | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | 2024 | | | | | | | | 2025 | | | 2026 | | 1. The RA Government has approved the package of amendments to the Law on the Confiscation of Property of Illicit Origin and other related acts and submitted them to the RA National Assembly for adoption.  2. Best practices for managing confiscated corruption proceeds and property of illicit origin have been introduced. | | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Prosecutor General’s Office (upon consent)  RA Ministry of Justice | | State Property Management Committee of RA |
| The OECD (2022) report “Anti-Corruption Reforms in Armenia: Pilot 5th Round of Monitoring Under the OECD Istanbul Anti-Corruption Action Plan” focuses on the transparency and regular auditing of the management of the assets that have been secured or confiscated in the framework of the proceedings related to the confiscation of the assets in corruption cases and of property of illicit origin (Benchmark 11.5.1). In this context, introducing and improving relevant mechanisms is important. | | II | | | | I | | | | II | | | |  | | |  | |
|  | | | |  | | | | Based on the best international practices, legal acts provide mechanisms for proper management of confiscated corruption proceeds and property of illicit origin (e.g. using the property for public benefit purposes). | | | | The package of legislative amendments and related draft legal acts is approved by the RA Government and submitted to the RA National Assembly for adoption. | | |  | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.15.**  Develop methodology and guidelines for the confiscation of property of illicit origin and conduct professional trainings. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| There is currently no methodology or guidelines for the confiscation property of illicit origin.  Professional trainings on these topics are not conducted. | 2023 | | | | | | 2024 | | | | | | 2025 | | | | | 2026 | | Methodology and guidelines for confiscation of property of illicit origin have been developed and applied. | | Available guidelines  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Ministry of Justice | | RA Prosecutor General’s Office (upon consent) |
| II | | | | | | I | | | | II | |  | | | | |  | |
|  | | | | | |  | | | |  | | The topics and modules for training programs, as well as methodology and guidelines for confiscating property of illicit origin are approved and provided to the relevant law enforcement bodies. | | | | |  | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.16.**  Enhance and modernize the methods for combating corruption in the international and transnational platforms with the participation of the Republic of Armenia and improve the international cooperation mechanisms. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | | 2025 | | | | 2026 | | The RA Government has approved the package of amendments to the Law on Mutual Legal Assistance on International Level and related legal acts and submitted them to the RA National Assembly for adoption. | | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Ministry of Justice | | RA Prosecutor General’s Office (upon consent) |
| The mechanisms of mutual assistance are ineffective, which obstructs the proper implementation of the process of confiscating illegal assets. | II | | | | | I | | | | II | | |  | | | |  | |
|  | | | | |  | | | |  | | | The adoption of the Law on Mutual Legal Assistance on International Level has led to the harmonization of asset recovery mechanisms and facilitated property return in accordance with international experience. | | | |  | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| **SPECIFIC OBJECTIVE** | | **ENHANCEMENT AND MODERNIZATION OF THE WHISTLEBLOWING SYSTEM** | | | | | | | | | | |
| **Activity 2.17**  Ensure the effectiveness of the whistleblowing system. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
|  | 2023 | | 2024 | | | 2025 | 2026 | The RA Government has approved the package of amendments to the Law on the Whistleblowing System and related legal acts and submitted them to the RA National Assembly for adoption.  At least two guidelines and methodical materials are developed on the activities of whistleblowing officers. | Available legal acts  Available guidelines and methodical materials  Semi-annual and annual monitoring reports | RA Ministry of Justice | RA Prosecutor General’s Office (upon consent)  Corruption Prevention Commission (upon consent)  Civil society organizations (upon consent) |
| The effective practical application of various types of whistleblowing, including internal whistleblowing, external whistleblowing, and whistleblowing to the public, is not ensured.  Since the launch of the whistleblowing system, 13 cases of internal whistleblowing and 73 cases of external whistleblowing reports were registered in state bodies.  The current whistleblowing model does not provide any criteria for appointing whistleblowing officers. There is no authority responsible for training whistleblowing officers. The scope of private organizations included in the scope of whistleblowing, related reporting and processing details are unclear.  In addition, the current legal reforms provide the possibility of whistleblowing to the public only in limited cases, while Benchmark 4.2.1 of the Pilot 5th Round of Monitoring Under the Istanbul Anti-Corruption Action Plan states that the possibility of whistleblowing to the public should be provided by law and applied in practice. | II | | I | II | |  |  |
|  | | 1. The practical issues of the whistleblowing system are identified. | 1. The current model for whistleblowing systems is revised to ensuring the practical applicability of various types of whistleblowing and organizational structures for protecting whistleblowers’ rights by the Human Rights Defender.  2. The existing mechanisms of whistleblowing to the public are revised to allow reporting to the public without going through the internal and/or external reporting channels in cases where illegal corrupt activities pose an immediate or obvious threat to the public, or when a risk of retaliation (harmful actions) exists, or the likelihood of addressing the violation is low in case of using other types of whistleblowing reports. | | The model for the whistleblowing system is chosen, and the whistleblowing officers are selected and appointed through professional and merit-based principles and procedures. The RA Ministry of Justice is defined as an authorized body to coordinate the activities of whistleblowing officers and organize their training. | The guidelines and methodical materials on the activities of whistleblowing officers are prepared. |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 2.18**  Develop a system for tracking statistics on whistleblowing cases. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | 2025 | 2026 | The RA Government has approved a draft decision outlining the procedure for whistleblowing statistics, standard and mandatory rules for maintaining statistics and the list of included data. | Available legal acts  Semi-annual and annual monitoring reports | RA Ministry of Justice | RA Ministry of High-Tech Industry  RA Prosecutor General’s Office (upon consent)  Local self-government bodies (upon consent)  Corruption Prevention Commission (upon consent) |
| Standard and mandatory rules for tracking statistics are lacking. The data included in these statistics is limited, and there are few authorities responsible for tracking statistics. | II | | I | | II |  |  |
|  | |  | | Standard and mandatory rules for maintaining statistics are introduced and encompass the data on whistleblower protection measures. | The scope of authorities responsible for whistleblowing statistics is expanded. | The unified statistical data is publicly available at the electronic platform. |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 2.19**  Enhance the whistleblowing e-platform. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | 2025 | 2026 | Technical specifications have been developed and approved.  An upgraded whistleblowing e-platform has been launched by the end of 2025. | Available technical specifications  Functional electronic tools | RA Ministry of Justice  RA Prosecutor General’s Office (upon consent) | Civil society organizations (upon consent)  RA Ministry of High-Tech Industry  Corruption Prevention Commission (upon consent) |
| The current whistleblowing e-platform does not meet basic user-friendly standards. As of 2023, the data on the platform, including information about the platform and its opportunities, does not reflect legislative amendments to the RA Law on the Whistleblowing System adopted in December 2022. The statistical data presented on the platform are limited, and the platform does not allow to submit reports on legal entities. It is necessary to provide additional security measures for the platform. | II | | I | | II |  |  |
|  | | The main issues of the whistleblowing e-platform are identified.  The possibility to transfer the maintenance of the platform software from a private company to EKENG e-Governance Infrastructure Implementation Agency is explored with an aim to enhance the security of the unified e-platform for whistleblowing. | | Technical specifications for new whistleblowing platform are developed. | Based on the technical specifications, the new upgraded whistleblowing e-platform is launched.  The expediency of assigning the implementation of the unified whistleblowing e-platform software to the e-Governance Infrastructure Implementation Agency has been explored. |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 2.20**  Enhance the mechanisms for protecting whistleblowers' rights and discuss the expediency of whistleblowing promotion measures. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | 2025 | 2026 | The RA Government has approved draft laws on amendments and additions to the Law on the Whistleblowing System and Constitutional Law on the Human Rights Defender and submitted them to the RA National Assembly for adoption. | Available legal acts  Reports on implemented measures  Press releases  Semi-annual and annual monitoring reports | RA Ministry of Justice  Corruption Prevention Commission (upon consent)  RA Prosecutor General’s Office (upon consent) | Civil society organizations (upon consent)  Human Rights Defender of the Republic of Armenia (upon consent) |
| Currently, there are no effective mechanisms in place to promote whistleblowing.  The effectiveness of whistleblowers’ protection means is doubtful; the legislation lacks the main requirements for the decisions resulting from the proceedings initiated on the basis of the whistleblowing report, the mechanisms to appeal these decisions, and the legal status of the whistleblowing proceedings.  In addition, the existing tools of protecting whistleblowers’ rights by the Human Rights Defender are not effective. | II | I | | | II |  |  |
|  | Based on international best practices, the need to introduce mechanisms for promoting whistleblowing are explored, the scope of whistleblowers’ protection measures is reviewed, and the organizational structures aimed at protecting whistleblowers’ rights by the Human Rights Defender are strengthened. | | | 1. The legal status for the whistleblowing proceeding is specified and the main requirements for proceedings initiated on the basis of the whistleblowing report are provided to ensure their proper justification and rationale.  2. The possibility of appealing the decisions adopted as a result of the whistleblowing proceeding is provided. | Draft legislative amendments are approved by the RA Government and submitted to the RA National Assembly for adoption. |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |

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| **SPECIFIC OBJECTIVE** | | **IMPROVING THE INSTITUTE OF CRIMINAL LIABILITY OF LEGAL PERSONS** | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 2.21.**  Conduct an impact assessment for introducing the institute of criminal liability of legal persons and revise the liability of persons exercising de-facto control, the proportionality of sanctions, and anti-corruption incentive mechanisms. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | | Implementing Bod | Co-Implementing Body |
| 2023 | | | | | 2024 | | | | | | 2025 | | | 2026 | | | | | 1. An analysis has been conducted to assess the impact of introducing the institute for criminal liability of legal persons.  2. The RA Government has approved the draft amendments to the RA Criminal Code and submitted to the RA National Assembly for adoption. | | | Available legal acts  Semi-annual and annual monitoring reports  Press releases  Media publications | | RA Ministry of Justice | The Anti-Corruption Committee (upon consent)  RA Prosecutor General’s Office (upon consent)  RA Investigative Committee (upon consent)  The Supreme Judicial Council (upon consent)  Corruption Prevention Commission (upon consent)  Civil society (upon consent) |
| The new Criminal Code, effective since July 1, 2022, introduced the institution of criminal liability for legal persons (Chapters 20-21). Although this institute has been just recently established, experts and the business community have raised several concerns. | II | | | | | I | | | II | | |  | | |  | | | | |
|  | | | | |  | | |  | | | An analysis is conducted to assess the impact of introducing the institute for criminal liability of legal persons. | | | The RA Criminal Code is revised to incorporate liability for individuals exercising de-facto control, the proportionality of sanctions, and anti-corruption incentive mechanisms. | | | | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **STRATEGIC GOAL 3: ANTI-CORRUPTION EDUCATION AND IMPROVING PUBLIC AWARENESS MECHANISMS** | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **EXPECTED RESULTS** | 1. **Educational programs on ethics, integrity, and anti-corruption are introduced and consistently implemented in educational institutions, contributing to the anti-corruption knowledge and laying a stable foundation for perceiving corruption as a negative phenomenon.** 2. **The staff of educational institutions possess the necessary anti-corruption knowledge, capacities, perceptions, and skills.** 3. **The educational process with revised subject curricula ensures effective anti-corruption education, including professional education on preventing and combating corruption.** 4. **Effective mechanisms for implementing anti-corruption non-formal educational programs are introduced.** 5. **An anti-corruption public communication and awareness action plan is developed and implemented, raising general public awareness and contributing to the intolerant attitude toward corruption.** | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **EXPECTED IMPACT** | * **Intolerance towards and the fight against corruption are integrated in the value system of the society and citizens’ personal behavioral practices of rejecting corruption are evidenced by prominent reports and research.** * **Effective structures and mechanisms are introduced to implement a consistent and coordinated state policy in organizing anti-corruption education.** * **Over the years, public awareness of anti-corruption policies and efforts to combat corruption has increased as compared to 2022 data.** | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.1**  Develop and implement an educational program on ethics, integrity and anti-corruption for 5-6-year-old children in preschool educational institutions. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | 2024 | | | | | | | | | | 2025 | | | | 2026 | | | 1. An educational program on ethics, integrity, and anti-corruption for 5-6-year-old children has been developed and implemented in the preschool educational institutions.  2. The program is introduced and implemented in 50% of the RA preschools; half of them is located in rural communities.  3․ A baseline knowledge assessment has been conducted in 50% of the RA preschools.  4. According to the knowledge assessment results, an annual knowledge growth rate of 40% is achieved. | | | Developed and implemented programs including clear methodologies and modules, selection criteria for pilot preschool educational institutions  Reports on monitoring visits of inspection bodies  Reports on organized events  Knowledge pre-test and post-test scores  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Education Inspectorate  Local self-government bodies (upon consent)  Regional government bodies (upon consent)  Civil society organizations (upon consent) |
| Preschool educational institutions do not offer educational programs on ethics, integrity, and anti-corruption. | II | I | | | | | | | | II | |  | | | |  | | |
|  | The methodology and modules of the educational program on ethics, integrity, and anti-corruption in preschool educational institutions, as well as criteria for selecting pilot preschool educational institutions are developed and approved.  The pilot preschools are selected, and a knowledge evaluation system is developed. A baseline knowledge assessment is conducted in the selected institutions. | | | | | | | | The pilot program is implemented in 20 preschool educational institutions across four regions of Armenia and the city of Yerevan; 10 of these institutions are located in rural communities. | | A baseline knowledge assessment is conducted and the program is implemented in 30% of the RA preschools, with half of them located in rural communities. The program results are evaluated. | | | | A baseline knowledge assessment is conducted and the program is implemented in 50% of the RA preschools, with half of them located in rural communities. The program results are evaluated. | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.2**  Develop and implement a training program on ethics, integrity, and anti-corruption for teaching staff of preschool educational institutions. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | 2024 | | | | | | | | 2025 | | | | | 2026 | | | 1. A training program on ethics, integrity, and anti-corruption for teaching staff has been developed and implemented in preschool educational institutions.  2. The program has been introduced and implemented in 50% of the RA preschools, half of which are located in rural communities.  3․ A baseline assessment of knowledge has been conducted in 50% of the RA preschools.  4. According to the knowledge assessment results, an annual knowledge growth rate of 40% is achieved. | | | Training programs  Reports on monitoring visits of inspection bodies  Reports on organized events  Knowledge pre-test and post-test scores  Staff surveys  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Local self-government bodies (upon consent)  Regional government bodies (upon consent)  Civil society organizations (upon consent) |
| There are no mechanisms for conducting training on ethics, integrity, and anti-corruption for the teaching staff of preschool educational institutions. | II | | I | | | | II | | | |  | | | | |  | | |
|  | | The methodology and modules of the training program and the criteria for selecting pilot preschool educational institutions are developed and approved. | | | | The pilot preschool educational institutions are selected, and a knowledge assessment system is developed. A baseline knowledge assessment is conducted in the selected institutions. The pilot program is implemented in 20 preschools across four regions of Armenia and the city of Yerevan; 10 of them are located in rural communities. | | | | A baseline knowledge assessment is conducted, and the program is implemented in 30% of the RA preschools, with half of them located in rural communities. The program results are evaluated.  A baseline knowledge assessment is conducted, and the program is implemented in 50% of the RA preschools, with half of them located in rural communities. The program results are evaluated. | | | | |  | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.3**  Enhance the curricula of the Social Studies included in general secondary education. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | 2024 | | | | | | | | 2025 | | | 2026 | | | | | 1. The updated curricula of the subject Social Studies is introduced, incorporating the main components of anti-corruption education.  2. The updated curricula is introduced and implemented in 50% of the RA schools; half of them is located in rural communities.  3․ A baseline knowledge assessment has been conducted in 50% of the RA schools. | | | Updated and approved curricula for the subject Social Studies  Developed and approved educational materials that incorporate an anti-corruption component  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Education Inspectorate  Regional government bodies (upon consent)  Civil society organizations (upon consent) |
| The curricula of the Social Studies of general secondary education does not include an effective anti-corruption component. Information on corruption is provided to a limited extent, but the main approaches adopted by the state to prevent and combat corruption are not covered.  Furthermore, the materials on different aspects of corruption often use complex professional terminology. There is a lack of supporting educational and methodological literature on the topic. | II | | I | | | | II | | | |  | | |  | | | | |
|  | | The terms of reference for developing the anti-corruption educational component are prepared and approved. | | | | The pilot schools are selected. A knowledge assessment system is developed. A baseline knowledge assessment is conducted in the selected schools. | | | | The pilot program is implemented in 15 schools across four regions of Armenia and the city of Yerevan, with 10 of these schools located in rural communities. | | | A baseline knowledge assessment is conducted and the program is implemented in 30% of the RA schools, with half of them located in rural communities. The program results are evaluated.  A baseline knowledge assessment is conducted and the program is implemented in 50% of the RA schools, with half of them located in rural communities. The program results are evaluated. | | | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.4**  Develop and implement a training program for teachers of Social Studies. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | 2024 | | | | | | | | 2025 | | | | | | 2026 | | 1. A training program for schoolteachers has been developed and approved.  2. The program is introduced and implemented in 50% of the RA schools; half of them is located in rural communities.  3. According to the knowledge assessment results, an annual knowledge growth rate of 40% is achieved. | | | Developed and approved program  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Reports on organized events, press releases  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Education Inspectorate  Civil society organizations (upon consent) |
| There is no relevant training for teachers of Social Studies. | II | | I | | | | II | | | |  | | | | | |  | |
|  | | The methodology and modules of the training program and the criteria for selecting pilot schools are developed and approved. | | | | The pilot schools are selected and the knowledge evaluation system is developed. A baseline knowledge assessment is conducted in the selected schools. The pilot program is implemented in 1520 schools across four regions of Armenia and the city of Yerevan, with half of these schools located in rural communities. | | | | A baseline knowledge assessment is conducted and the program is implemented in 30% of the RA schools, with half of them located in rural communities. The program results are evaluated.  A baseline knowledge assessment is conducted and the program is implemented in 50% of the RA schools, with half of them located in rural communities. The program results are evaluated. | | | | | |  | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.5.**  Include ethics, integrity, and anti-corruption education programs in vocational schools and colleges and provide respective training for their teaching staff. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | 2024 | | | | | | | | | | 2025 | | | | | 2026 |
| Ethics, integrity, and anti-corruption education programs are not implemented in vocational education institutions. Furthermore, there are no trainings on these topics for their teaching staff. | II | | I | | | | | | | II | | |  | | | | |  | 1. The educational program is introduced and implemented in 30% of the RA educational institutions; half of them is located in rural communities.  2. 100 members of the teaching staff have successfully passed the training.  3. According to the knowledge assessment results, an annual knowledge growth rate of 40% is achieved. | | | Developed and approved program  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Reports on organized events, press releases  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Education Inspectorate  Civil society organizations (upon consent) |
|  | | The methodology and modules of the program on integrity, ethics, and anti-corruption, and the criteria for selecting pilot educational institutions are approved.  The pilot program is implemented in 20 educational institutions across four regions of Armenia and the city of Yerevan, with half of these institutions located in rural communities. | | | | | | | A baseline knowledge assessment is conducted and the program is implemented in 30% of all educational institutions, with half of them located in rural communities. The program results are evaluated. | | | The methodology and modules of the training program are developed and approved.  The program is implemented in 30% of all educational institutions, with half of them located in rural communities. | | | | | Trainings are organized for the teaching staff of educational institutions. |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.6**  Conduct scientific research in the area of anti-corruption by the post-graduate professional education institutions at the request of government agencies. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | 2024 | | | | | | | | | 2025 | | | | 2026 | | | Ten anti-corruption scientific researches are implemented annually in at least 10 post-graduate education institutions. | | | Developed and funded program  Reports on organized events, press releases  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Civil society organizations (upon consent)  RA Ministry of Justice |
| Currently, there are no mechanisms to promote anti-corruption scientific research in institutions that provide post-graduate education. | II | | I | | | | | | | II | |  | | | |  | | |
|  | | Based on needs assessment, a program for conducting anti-corruption scientific research is developed by the government order and submitted for funding. | | | | | | | The program is approved and submitted for funding. | | The program is implemented in at least five post-graduate educational institutions. | | | | The program is implemented in at least five post-graduate educational institutions. | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.7**  Create a platform integrating anti-corruption literature sources in the dedicated section of the Armenian Educational Portal. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | 2024 | | | | | | | 2025 | | | 2026 | | | | The platform provides access to the key anti-corruption documents in Armenian.  At least 1000 users are registered in the platform.  At least two awareness campaigns for target groups have been implemented. | | | Implemented and operational platform  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports  RA Ministry of High-Tech Industry | | Corruption Prevention Commission (upon consent)  Civil society organizations (upon consent) |
| There is currently no integrated platform in Armenia for collecting key literature sources on anti-corruption. Such a platform would provide the public with access to theoretical and practical materials on combating corruption. | II | | | | I | | | | | II | |  | | |  | | | |
|  | | | | The technical specification of the platform for anti-corruption literature sources is developed. | | | | | The technical specifications are approved and funding for the platform is allocated. | | Key documents with anti-corruption content are collected for the platform. | | | The platform is operational and offers a broad selection of literature sources covering anti-corruption topics.  Awareness campaigns for specific target groups are conducted. | | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.8**  Develop and implement an education program or component on ethics, integrity, and anti-corruption for students upon the consent of the higher education institutions. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | 2024 | | | | | | | 2025 | | | | 2026 | | | At least 30% of university students receive anti-corruption education as part of a model program. | | | Developed model program  Introduced and implemented program in at least five universities  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Higher education institutions (upon consent)  Civil society organizations (upon consent) |
| In Armenia, 14 organizations (including five state universities in Yerevan, three regional universities, three universities established by intergovernmental agreement, and three NGOs) implement education programs on corruption prevention as part of the subject Fundamentals of Law. However, the presented topics vary significantly from one organization to another. There is a lack of a consistent approach to anti-corruption courses and a high demand for educational guidelines and didactic materials. | II | | | | I | | | | | II | |  | | | |  | | |
|  | | | | A model education program is developed. | | | | | The model program is offered to universities for including in the mandatory curriculum upon their consent. | | Universities include the model program as a part of their mandatory curriculum. | | | |  | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.9**  Develop and implement training on ethics, integrity, and anti-corruption for the academic staff in higher education institutions. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | 2024 | | | | | | | | 2025 | | | | 2026 | | | 1. The training program on ethics, integrity, and anti-corruption for academic staff in higher education institutions has been developed and approved.  2. The program is introduced and implemented in at least 50% of the RA universities. | | | Reports on delivered trainings  Knowledge assessment reports and employee surveys  Reports on organized events, press releases  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Higher education institutions (upon consent)  Civil society organizations (upon consent) |
| Higher education institutions do not have mechanisms in place to conduct training on ethics, integrity, and anti-corruption for academic staff. | II | | | I | | | | | | II | |  | | | |  | | |
|  | | | The methodology and modules of the training program based on similar international and local experience are developed and approved.  Pilot universities are selected according to specific selection criteria. | | | | | | The pilot program is implemented in four regional universities and five universities in Yerevan. | | The program is implemented in at least 30% of the RA universities. The program results are evaluated. | | | | The program is implemented in at least 50% of the RA universities. The program results are evaluated. | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.10**  Develop and implement programs in higher education institutions to offer student internships in anti-corruption bodies; provide scholarship opportunities to study anti-corruption in foreign educational institutions. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | 2024 | | | | | | | 2025 | | | | | 2026 | | | Memorandums of cooperation between anti-corruption bodies and educational institutions have been signed.  Practical programs for student internships have been developed and approved.  At least 10 universities, including their regional branches, implement new models for internship programs.  The government provides scholarships for at least two students annually to study at foreign educational institutions specializing in anti-corruption. | | | Signed memorandums  Student internship programs based on memorandums  Awarded scholarships | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Higher education institutions (upon consent)  Civil society organizations (upon consent) |
| Higher education institutions do not offer effective programs for student internships in anti-corruption bodies.  The government does not provide targeted scholarship opportunities for studying anti-corruption in foreign educational institutions. | II | | | I | | | | | | II |  | | | | |  | | |
|  | | | Memorandums of cooperation are signed between anti-corruption bodies and educational institutions. | | | | | | Programs for student internships are developed and approved. | Student internship pilot programs are conducted in five educational institutions. Baseline and final knowledge assessments are completed. | | | | | A competition is held in higher education institutions to select students who applied to study anti-corruption in foreign institutions. | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.11**  Contribute to the non-formal anti-corruption education programs in educational institutions through establishing anti-corruption clubs in schools and anti-corruption laboratories (R&D) in universities to conduct anti-corruption studies, examine legal acts for corruption, and provide research and analytical support for anti-corruption programs. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | 2024 | | | | | | | 2025 | | | | 2026 | | | 1. Anti-corruption clubs are established in at least 30% of the RA schools.  2. Anti-corruption laboratories are available in at least 30% of higher education institutions. | | | Developed programs  Reports on organized events, press releases  Semi-annual and annual monitoring reports | | RA Ministry of Education, Science, Culture and Sports | | Corruption Prevention Commission (upon consent)  Higher education institutions (upon consent)  Civil society organizations (upon consent) |
| Currently, there are no mechanisms for implementing non-formal anti-corruption educational programs in schools and higher education institutions. | II | | | | I | | | | | II | |  | | | |  | | |
|  | | | | The need for anti-corruption laboratories in universities and anti-corruption clubs in schools is assessed.  Based on the needs assessment, projects are developed to establish anti-corruption clubs and anti-corruption laboratories. | | | | | As a result of the project, anti-corruption clubs are established in 30% of the RA schools, with half of them located in rural communities, and anti-corruption laboratories are established in 30% of universities. | | As a result of the program, anti-corruption knowledge is disseminated in schools through non-formal education and anti-corruption and other research is conducted in universities. | | | |  | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.12**  Develop and implement an anti-corruption public communication and awareness program, incorporating a system for evaluating its effectiveness. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | 2024 | | | | | | | | | 2025 | | | | 2026 | | | As set by the public communication and awareness program, the public is regularly informed about the anti-corruption policy, their rights and responsibilities when interacting with state agencies, the whistleblowing system, criminal liability of legal entities, beneficial ownership, procurement, and other relevant topics; consistent measures are implemented to raise public awareness. | | | Available terms of reference  Public opinion research  Developed and implemented programs  Developed and implemented evaluation system  Developed and published report  Reports on organized events, press releases  Semi-annual and annual monitoring reports | | Corruption Prevention Commission (upon consent) | | RA state administration bodies  Law enforcement agencies  Civil society organizations (upon consent)  The Council of Public Broadcaster in Armenia  Public broadcasters  Private broadcasters (upon consent) |
| As part of the 2022 Anti-Corruption Communication Action Plan, the public was informed about anti-corruption reforms at least seven times over a six-month period. However, the awareness campaigns lacked a targeted approach, failed to reach, engage, and inform a broad audience, did not consider the features of the national mentality, and did not specify the main target groups. | II | | I | | | | | II | | | |  | | | |  | | |
|  | | 1) The terms of reference for preparing public communication and awareness program are developed and approved.  2) The public communication and awareness program is prepared and approved.  3) The methodology for conducting regular public opinion polls on corruption is developed and approved. | | | | | 1) The system for regular evaluation of the results of public communication and awareness programs are developed and approved.  2) The public opinion poll on corruption is conducted and the results’ evaluation report is published. | | | | In accordance with the developed public communication and awareness program and taking into account the results of public opinion poll, anti-corruption information is disseminated to raise public awareness. | | | | In accordance with the developed public communication and awareness program and taking into account the results of public opinion poll, anti-corruption information is disseminated to raise public awareness. | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.13**  Enhance the capacities of the Corruption Prevention Commission in the area of non-formal anti-corruption education and public awareness. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | 2024 | | | | | | | 2025 | | | | | 2026 | | | At least 20 training courses have been organized and conducted for CPC’s staff. The duration of each training is at least four academic hours. As a result of the knowledge post-test, the trainees demonstrated at least 90% knowledge proficiency. | | | Reports on delivered trainings  Knowledge assessment reports and employee surveys  Knowledge pre-test and post-test scores  Knowledge assessment reports and employee surveys  Reports on organized events, press releases  Semi-annual and annual monitoring reports | | Corruption Prevention Commission (upon consent) | | RA state administration bodies  Civil society organizations (upon consent) |
| Currently, there are no professional development programs for relevant departments of Corruption Prevention Commission on effective implementation of non-formal anti-corruption education and public awareness. | II | | | I | | | | II | | |  | | | | |  | | |
|  | | |  | | | | A capacity building program is developed and the available resources are assessed. | | | Programs and trainings aimed at the development of own capacities are regularly implemented for the relevant CPC departments. | | | | | Programs and trainings aimed at the development of own capacities are regularly implemented for the relevant CPC departments. | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.14**  Strengthen the capacities of CSOs and CSO networks to raise funds for non-formal anti-corruption education and public awareness programs. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | 2024 | | | | | | | | 2025 | | | | 2026 | | | By the end of 2024, the capacity building program for CSOs has been approved and funded.  By the end of 2025, the program has been implemented for at least six CSOs and CSO networks.  By the end of 2026, at least 35 training courses for CSOs have been conducted, each with duration of at least four academic hours. As a result of the knowledge post-test, the trainees demonstrated at least 80% knowledge.  By the end of 2025, at least 10 awareness campaigns have been conducted jointly with CSOs. | | | Developed and implemented programs  Reports on provided trainings  Knowledge assessment reports and participant surveys  Reports on organized events, press releases  Semi-annual and annual monitoring reports | | Corruption Prevention Commission (upon consent) | | RA state administration bodies  Civil society organizations (upon consent) |
| The organization of non-formal education programs has largely been assumed by the civil society; however, the scope of these programs is not sufficient to achieve the desired results. The implemented public awareness measures are scattered, partly due to the lack of effective CSO engagement mechanisms. | II | | | I | | | | | | II | |  | | | |  | | |
|  | | | Participatory fundraising mechanisms for CSOs in the area of non-formal anti-corruption education and public awareness are developed and approved.  Fundraising capacities and needs of CSOs are assessed. | | | | | | As a result of assessing capacities and needs, the capacity building program is developed and resources are assessed. | | The capacity building program is implemented for at least six CSOs and CSO networks. | | | | As a result of fundraising, public awareness campaigns and non-formal education programs are implemented jointly with CSOs. | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |
| **Activity 3.15**  Adopt uniform legal regulations in the field of anti-corruption education. | Baseline Data | Performance Targets | | | | | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | | Verification Means | | Implementing Body | | Co-Implementing Body |
| 2023 | | | | 2024 | | | | | | | 2025 | | | | 2026 | | | The RA Government has approved the draft Law on Education on Combating and Preventing Corruption and submitted to the RA National Assembly for adoption. | | | Available legal act  Semi-annual and annual monitoring reports | | Corruption Prevention Commission  RA Ministry of Education, Science, Culture and Sports | | Civil society organizations (upon consent)  RA Ministry of Justice |
| There is no legal act to regulate a consistent policy on anti-corruption education, including the uniform methodology of anti-corruption education. | II | | | | I | | | | | II | |  | | | |  | | |
|  | | | |  | | | | |  | | A draft law on anti-corruption education is developed based on international best practices to specify the general objectives, methodology, institutional system, and other key issues related to anti-corruption education. | | | | The package of amendments to the Law on Education on Combating and Preventing Corruption and related legal acts is approved by the RA Government and submitted to the RA National Assembly for adoption. | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| **STRATEGIC GOAL 4: BUSINESS INTEGRITY, PROTECTING BUSINESS RIGHTS AND FACILITATING STATE-BUSINESS ADMINISTRATION** | | | | | | | | | | | | | | | | | | | |
| **EXPECTED RESULTS** | | 1. **The new Corporate Governance Code is adopted and implemented. Commercial organizations that adhere to the Code have introduced effective anti-corruption structures and mechanisms.** 2. **By the end of 2026, all commercial organizations with state and community participation are mandated to apply the new Corporate Governance Code. All state and community organizations implement anti-corruption compliance mechanisms.** 3. **Corruption risk assessment and mitigation programs are approved and implemented in at least five commercial organizations with state participation.** 4. **New mechanisms, tools, and structures are introduced into the national legal system to prevent corruption in the private sector.** 5. **New smart electronic anti-corruption tools are launched in the customs and tax authorities as part of the anti-corruption efforts.** 6. **The institute for disclosing beneficial owners of legal entities is improved; specifically, unified mechanisms for verifying beneficial ownership information are introduced and applied and the methodology and technical regulations for determining the risk level of legal entities are developed and approved.** 7. **The legislation excludes the direct or indirect participation of high-ranking officials and their family members in public procurement processes.** | | | | | | | | | | | | | | | | | |
| **EXPECTED IMPACT** | | * **The confidence of the business community in state institutions and administrative processes has increased as compared to the 2022 data and research.** * **By the end of 2026, the new Corporate Governance Code has been applied by at least 50% more commercial organizations as compared to 2022 data.** * **By the end of 2026, programs for corruption risk assessment and mitigation have been implemented in at least five commercial organizations with the largest state participation.** * **The trust of citizens and organizations towards public procurement processes has increased as compared to 2022 data.** | | | | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **STRENGTHENING INTEGRITY IN THE BUSINESS SECTOR** | | | | | | | | | | | | | | | | | |
| **Activity 4․1**  Introduce anti-corruption compliance mechanisms in the business sector to develop a culture of corporate governance. | Baseline Data | Performance Targets | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | | 2025 | 2026 | | | 1. The Code has been approved by the competent authority.  2. Mechanisms for monitoring, accountability, transparency, and oversight are included in the Code.  3. At least two measures have been organized and held to promote the Code's application in practice.  4. By the end of 2026, at least eight awareness-raising campaigns have been organized and implemented in collaboration with specialized CSOs (business support organizations/business membership organizations), including via social media platforms and mass media.  5. By the end of 2026, at least eight training courses have been organized and conducted in cooperation with specialized CSOs, each with duration of at least four academic hours. As a result of the knowledge post-test, the trainees demonstrated at least 90% knowledge proficiency. | | Available legal acts  Reports on organized events Press releases  Semi-annual and annual monitoring reports | RA Ministry of Economics | RA Ministry of Justice  Corporate Governance Center (upon consent)  Civil society organizations/ business support organizations/business membership organizations (upon consent) |
| The Corporate Governance Code was approved on December 30, 2010.  A new Code aligned with the latest developments in the business environment and corporate governance culture should be adopted. | II | | I | | | | II | | |  |  | | |
|  | | The draft of the new Corporate Governance Code is updated to align with the anti-corruption requirements of international Corporate Governance standards.  Oversight mechanisms for the application of the Code are established. | | | | The Code is approved by the competent authority. | | | At least two measures promoting the application of the Code in practice are organized and implemented (at least one state support program encourages the application of the Corporate Governance Code with an anti-corruption compliance element as one of the criteria for receiving support; and the application of the Code is considered as a circumstance that excludes or mitigates the criminal liability of a legal entity under the Criminal Code). This also includes information campaigns, awareness-raising events, and at least three training courses. | At least three awareness-raising campaigns promoting the introduction of anti-corruption compliance requirements and relevant collective efforts are organized and conducted in cooperation with specialized CSOs (business support organizations and business membership organizations).  Trainings are organized and conducted in cooperation with specialized CSOs (business support organizations and business membership organizations). | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 4․2**  Establish anti-corruption compliance mechanisms in state and community commercial organizations; enhance accountability mechanisms. | Baseline Data | Performance Targets | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | 2025 | | | | 2026 | 1. The mandatory requirement for commercial organizations with state and community participation to apply the new Corporate Governance Code has been established by law.  2. The RA Government has approved the package of relevant amendments to the Law on Non-Commercial State Organizations, the Law on State Administration Bodies, and other related laws and submitted them to the RA National Assembly for adoption. The amendments have enhanced the standards for transparent, merit-based appointment of directors and board members and the standards of board members’ independence; accountability, transparency, internal control, and risk management systems, as well as external audit requirements in commercial organizations with state and community participation. | | Available legal acts  Semi-annual and annual monitoring reports | RA Ministry of Justice  RA Ministry of Economics | RA Ministry of Finance |
| 1. In 2022, a draft legal act was developed to consider implementation of anti-corruption compliance mechanisms as an advantage in state support program criteria. However, it was not adopted or approved, and the draft is currently in the stage of internal discussions.  2. By 2022, around 22 members of the Business Integrity Club have established anti-corruption compliance mechanisms. | II | | I | | | | II | |  | | | |  |
|  | |  | | | | A mandatory requirement for commercial organizations with state and community participation to apply the new Corporate Governance Code is established. | | A package of legislative amendments is developed to enhance standards for transparent, merit-based appointment of directors and board members and the standards of board members’ independence; improve accountability, transparency, internal control, and risk management systems, as well as external audit requirements in commercial organizations with state and community participation. This package is approved by the RA Government and submitted to the RA National Assembly for adoption. | | | |  |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 4.3.**  Introduce corruption risk assessment and management systems in organizations with state and community participation. | Baseline Data | Performance Targets | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | 2025 | | 2026 | | | 1. Ricks management and evaluation methodology has been approved.  2. The RA Government has approved the package of amendments to the Law on the Corruption Prevention Commission and other related laws and submitted them to the RA National Assembly for adoption.  3. The methodology has been piloted in at least three organizations with various legal forms.  4. At least five training courses of at least four academic hours each have been organized and conducted for the CPC staff. As a result of the knowledge post-test, the trainees demonstrated at least 80% knowledge proficiency.  5. At least three training courses of at least four academic hours each have been organized and conducted in the organizations that passed the pilot assessment. As a result of the knowledge post-test, the trainees demonstrated at least 80% knowledge proficiency.  6. By the end of 2025, corruption risk assessment and mitigation programs have been approved in at least five organizations. | | Available legal acts  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Reports on organized events, press releases  Semi-annual and annual monitoring reports | Corruption Prevention Commission (upon consent) | RA Ministry of Justice |
| Issues related to establishing corruption risk assessment and management systems in state and community-owned organizations are not covered by RA legislative and strategic regulations.  The methodology for risk assessment and management is not approved. | II | | I | | | | II | |  | |  | | |
|  | | A package of legislative amendments is developed to assign the CPC with the authority to develop and approve the methodology for the identification, assessment, and management of corruption risks in state and community-owned organizations. | | | | 1. The legislative package is approved by the RA Government and submitted to the RA National Assembly for adoption.  2. The methodology for corruption risk assessment and management is approved.  3. The methodology is piloted in at least three organizations with various legal forms. | | 1. The institutional capacities of the Corruption Prevention Commission are strengthened.  2. At least five training courses are organized and conducted for the CPC staff.  3. At least three training courses are organized and conducted for the organizations that passed the pilot assessment. | | Corruption risk assessment and mitigation programs are approved by OECD in at least five largest commercial organizations with state participation (St. Grigor Lusavorich MC CJSC, ANPP CJSC, YTPC CJSC, HVEN CJSC, Jrar CJSC). | | |
| **Source of funding** |  | | | | | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **ENHANCING MECHANISMS FOR PROTECTING BUSINESS RIGHTS** | | | | | | | | | | | | | | | | | |
| **Activity 4․4**  Strengthen the institutional capacities of the Office of the Human Rights Defender for protecting business rights in relations between the private sector and state bodies. | Baseline Data | Performance Targets | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | 2025 | | | 2026 | | 1. The positions of the relevant HRD department are filled.  2․ By the end of 2026, at least six training courses have been organized and conducted for the HRD staff. The duration of each training is at least four academic hours. As a result of the knowledge post-test, the trainees demonstrated at least 80% knowledge proficiency. | | Semi-annual and annual monitoring reports  Reports on delivered trainings  Knowledge assessment reports and employee surveys | Office of the Human Rights Defender (upon consent) | Specialized CSOs (upon consent) |
| The relevant department of the Office of the Human Rights Defender received 207 written complaints from 271 individuals in 2021 and 2022. Out of these, 41 complaints were submitted by business community representatives.  These statistics include only the written complaints submitted to the Human Rights Defender and do not provide any data on its activities to identify and resolve systemic problems in the business sector, legal advice and visits, and engagement in examining cases by the authority dealing with procurement-related complaints.  Furthermore, in 2021 and 2022, the mentioned department provided 896 legal consultations to individuals and legal entities via the HRD hotline and phone communication, addressing issues related to rights and freedoms, as well as possibilities of effective protection.  Currently, the relevant HRD department is facing challenges in recruiting staff for open positions. | II | | I | | | | II | |  | | |  | |
|  | | The vacant positions of the HRD department dealing with protection of business rights are filled. | | | | At least two training courses are organized and conducted for the staff of the relevant HRD department on protecting business rights in relations between the private sector and state bodies. | | At least four training courses are organized and conducted for the staff of the relevant HRD department on protecting business rights in relations between the private sector and state bodies. | | |  | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 4.5.**  Raise the awareness of the business community about anti-corruption mechanisms and effective protection of their rights. | Baseline Data | Performance Targets | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | 2025 | | 2026 | | | By the end of 2026, at least six awareness-raising events have been organized and implemented, including via mass media and social media platforms. | | Semi-annual and annual monitoring reports  Press releases  Media publications | RA Ministry of Economics | RA Ministry of Justice  Office of the Human Rights Defender (upon consent)  Specialized CSOs (upon consent) |
| The Private Sector Corruption Risks Assessment in the Field of Public Administration Services in the Republic of Armenia conducted in April 2023 revealed insufficient knowledge among the business community regarding the anti-corruption mechanisms and effective means for protecting their rights. In this context, the current mechanisms (such as e-draft platform, irregular public discussions) were assessed as not satisfactory.  The government should focus its efforts towards two directions: actively engaging with business associations and informing the private sector about the upcoming and implemented measures (including legislative reforms), including their rationale, objectives, and current status. | II | | I | | | | II | |  | |  | | |
|  | |  | | | | At least two awareness-raising events are organized and implemented for the business community about anti-corruption mechanisms and effective protection of their rights. | | At least four awareness-raising events are organized and implemented for the business community about anti-corruption mechanisms and effective protection of their rights. | |  | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 4.6.**  Enhance the tools used by the CPC to combat corruption in the private sector. | Baseline Data | Performance Targets | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | 2025 | | | 2026 | | | The RA Government has approved the package of relevant amendments to the Law on Corruption Prevention Commission and other related legal acts was and submitted them to the RA National Assembly for adoption. | | Available legal acts  Semi-annual and annual monitoring reports | Corruption Prevention Commission (upon consent) | RA Ministry of Justice |
| A widespread international approach involves assigning corruption prevention bodies with the function of preventing corruption in the business sector through a dedicated department or team of specialists. In the framework of cooperation with the business sector, these bodies are also provided with tools to conduct confidential meetings aimed at assessing corruption risks and presenting proposals for reforms in the target sectors. | II | | I | | | II | |  | | |  | | |
|  | |  | | |  | | Legislative amendments are drafted to provide the CPC with the authority and resources to organize confidential meetings with the business sector to reveal corruption schemes in specific sectors and other issues.  The package of legislative amendments is approved by the RA Government and submitted to the RA National Assembly for adoption. | | |  | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **IMPROVING THE INSTITUTE OF DISCLOSING BENEFICIAL OWNERS OF LEGAL ENTITIES** | | | | | | | | | | | | | | | | | |
| **Activity 4.7**  Introduce mechanisms to ensure effective functioning of the institute of disclosing beneficial owners. | Baseline Data | Performance Targets | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | 2025 | | 2026 | | | 1․ The RA Government has approved the package of draft legislative amendments and additions to the RA Law on State Registration of Legal Entities, Separate Divisions of Legal Entities, Institutions and State Registration of Individual Entrepreneurs, RA Law on Combating Money Laundering and Terrorism Financing, and RA Law on Subsoil, and submitted them to the RA National Assembly for adoption.  2. Standardized mechanisms for verifying information on beneficial owners are introduced and implemented.  3. The methodology and technical regulations for determining the risk level of legal entities are developed and approved.  4․ The possibility of public oversight over the credibility of data submitted by declarant legal entities is ensured.  5․ The legal content of the term "beneficial owner" is clarified and the consistency of its use across various legal acts is ensured.  6․ Basic guidelines for identifying beneficial owners by legal and organizational form are prepared and published. | | Available legal acts  Available technical regulations  Available guidelines  Semi-annual and annual monitoring reports  Press releases  Media publications | RA MoJ Agency for State Register of Legal Entities | RA Ministry of Justice  Corruption Prevention Commission (upon consent)  Civil society organizations (upon consent) |
| There are no effective methods to verify the credibility of beneficial ownership data, nor is there a clear methodology or technical regulations for determining the risk level of legal entities.  The term ‘beneficial owner’ is reflected in various ways across sector-specific legal acts.  User-friendly guidelines for identifying beneficial owners are not available. | II | | I | | | | II | |  | |  | | |
|  | | Standardized mechanisms for verifying information on beneficial owners are introduced. | | | | 1. The methodology for checking legal entities is developed and technical regulations are prepared.  2. The guidelines adopted by the CPC on declarations of property, income, expenses, and interests of the declarant official, and the property, income, and expenses of their family members, define all the grounds for identification of a person as a beneficial owner of a legal entity. | | 1. The possibility of public oversight over data credibility is ensured.  2. Consistency of the legal content of the term "beneficial owner" across various legal acts is ensured. | | User-friendly guidelines for identifying beneficial owners by legal and organizational form are prepared and published based on the unified standards. | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 4.8**  Modernize and improve the electronic systems of the State Register of Legal Entities and beneficial ownership declaration, as well as the related regulations. | Baseline Data | Performance Targets | | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | 2025 | | 2026 | | | | 1. The existing electronic tools are enhanced and modernized, or new electronic tools are introduced and applied in practice.  2. Interoperability between the State Register’s electronic system and other databases, including foreign registries, is provided.  3․ Automatic data exchange is ensured.  4. The RA Government and/or the CPC approved a package of amendments to normative acts that define all the grounds for identification of a person as a beneficial owner of a legal entity. | Functional electronic tools  Semi-annual and annual monitoring reports  Press releases  Media publications | MoJ Agency for State Register of Legal Entities | RA Ministry of Justice  RA Ministry of High-Tech Industry  Corruption Prevention Commission  Central Depository of Armenia  Civil society organizations (upon consent) |
| The electronic system of the State Register of Legal Entities lacks some of the essential technical capabilities such as data processing, analysis, search, automatic notifications, identification of legal entities based on risk criteria using red flags, performing data analytics, generating bulk open data, and introducing innovative tools.  Interoperability between the State Register’s electronic system and databases managed by other bodies is not provided. There are no opportunities for interoperability with foreign registries in the context of international cooperation. Possibilities for interoperability with foreign beneficial ownership registries in the framework of international cooperation are also absent. | II | | I | | | II | | |  | |  | | | |
|  | | The electronic system of the State Register of Legal Entities and the declaration of beneficial owners is effectively launched, providing technical capabilities for data processing, analysis, search, automatic notifications, identification of legal entities based on risk criteria using red flags, performing data analytics, generating bulk open data. | | | 1. Practical issues are addressed by eliminating technical failures and ensuring mandatory completion of the legally required data in electronic declarations; smart tools are integrated into the system to prevent inadvertent errors; and online authorization of individuals to submit declarations is made possible.  2. The electronic system for beneficial ownership declaration operates in a user-friendly and machine-readable format and in accordance with the open contracting data and open source standards. | | | 1. Interoperability between the State Register’s electronic system and databases managed by other bodies, specifically, the electronic systems of the CPC, shareholders’ registry, and the electronic system of public procurement is provided.  2. An effective mechanism for automatic data exchange is introduced. | | 1. Interoperability between the State Register’s electronic system and foreign beneficial ownership registries in the framework of international cooperation is provided.  2. An effective mechanism for automatic data exchange is introduced. | | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | | **IMPROVEMENT OF ADMINISTRATION MECHANISMS IN TAX AND CUSTOMS SECTORS** | | | | | | | | | | | | | | | | |
| **Activity 4.9.**  Increase the efficiency of the tax administration, improve the tools for combating the shadow economy, and reduce biased approach and corruption risks in relations between businesses and tax authorities. | Baseline Data | | Performance Targets | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | 2025 | | 2026 | | | Existing electronic tools have been improved, or new "smart" anti-corruption electronic tools are introduced. | | Semi-annual and annual monitoring reports  Press releases  Media publications | RA State Revenue Committee (upon consent) | RA Ministry of High-Tech Industry |
| According to Clause 1.1.14, Chapter 1.1 of the Strategic Plan for the Development of the State Revenue Committee of the Republic of Armenia and the Improvement of Administration (hereinafter: the Plan) approved by the RA Government's Resolution No. 1830-L of December 12, 2019, the actions of the Committee include creating an electronic management system for administrative offense cases (hereinafter: AO cases).  At present, AO cases against the official representatives of taxpayer entities, which are subject to examination by tax authorities under the RA Code of Administrative Offenses, are initiated and conducted in paper format. As set by the Action of the Plan, AO cases will be processed through an electronic system in an automated manner, without directly involving the user. This includes performing data comparisons, completing AO case documentation, and sending notifications based on the information available in the tax authority's information system database.  To fulfill the activities set by the relevant action, the RA Law No. HO-87-N on Amendments and Additions to the RA Code of Administrative Offenses was adopted on March 3, 2021, and will come into effect upon the implementation of the electronic system.  Currently, the collection of unpaid taxes is processed entirely through the electronic system Taxpayer-3, which is based on the information on unfulfilled tax obligations defined by the RA Tax Code or the RA laws on state fees. This information is maintained by the tax authority and included in the taxpayer's account card. Specifically, the list of taxpayers with unfulfilled tax obligations is generated by the aforementioned system through respective tools. The taxpayers included in the list receive an immediate electronic notification about the non-fulfillment of tax obligations within the timelines established by law.  It is important to note that Order No. 169-L "On approving the uniform standards, types, timelines, and delivery forms of the services provided to taxpayers " issued by the Head of the RA State Revenue Committee on March 14, 2023, regulates the terms and conditions for providing services to individuals, legal entities, their separate subdivisions, and institutions, and defines the list of services provided through electronic systems (https://www.petekamutner.am/Content.aspx?itn=tsTIServiceSingleStandard). | | II | | I | | | II | |  | |  | | |
|  | |  | | | Existing electronic tools are improved or new "smart" anti-corruption electronic tools are introduced. | | New electronic tools are put into practice | |  | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **IMPROVING INTEGRITY, ACCOUNTABILITY AND TRANSPARENCY IN THE PUBLIC PROCUREMENT PROCESS** | | | | | | | | | | | | | | | | | |
| **Activity 4.10**  Improve mechanisms for conflict of interest and anti-corruption in public procurement. | Baseline Data | Performance Targets | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | 2025 | | 2026 | | | 1. The RA Government has approved the package of relevant amendments to the Law on Public Procurement and other related legal acts and submitted them to the RA National Assembly for adoption.  2. The terms of reference for the electronic toolkit have been developed and approved.  3. The two electronic systems are available, connected, and applied in practice. | | Available legal acts  Semi-annual and annual monitoring reports  Available technical specification | RA Ministry of Finance | RA Ministry of Justice  RA Ministry of High-Tech Industry  Corruption Prevention Commission (upon consent) |
| It is necessary to continuously enhance and improve the mechanisms for regulating conflict of interests in public procurement.  The provisions of the RA Law on Procurement need improvement. | II | | I | | II | | | |  | |  | | |
|  | |  | | A package of relevant legislative amendments is developed to exclude the direct and indirect participation of high-ranking state officials, their family members, and related persons in public procurement processes.  The legislative package was approved by the RA Government and submitted to the RA National Assembly for adoption. | | | | The Electronic Procurement System of the RA Ministry of Finance (ARMEPS) is connected with the CPC’s electronic declaration system to enable the transfer of electronic procurement data, including declarations on the presence or absence of conflict of interest, to the CPC. | |  | | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |
| **Activity 4.11**  Improve screening software to detect violations in procurement competitions and develop guidelines for using these tools. | Baseline Data | Performance Targets | | | | | | | | | | | | | Outcome Indicators (quantitative and qualitative) | | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | | 2024 | | | | | | 2025 | | 2026 | | | 1. The technical specifications of the screening software and other tools to detect violations in the market have been developed.  2. Relevant electronic tools have been introduced and put into practice.  3. The guidelines have been developed and distributed among the staff.  4. At least six training courses of at least four academic hours each have been organized and conducted for the staff of the Competition Protection Commission. As a result of the knowledge post-test, the trainees demonstrated at least 80% knowledge proficiency. | | Available technical specifications  Functional electronic tools  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Available guidelines  Semi-annual and annual monitoring reports | Competition Protection Commission (upon consent) | RA Ministry of High-Tech Industry |
| In 2022, the Commission introduced a new electronic system (hereinafter: e-Compete system), which is interoperable with other state electronic systems and obtains data on business entities through web services, including information on their field of activity, shareholders, participation in other companies, assets, and income. In order to control the creation and strengthening of dominant positions, the System uses algorithms by automatically downloading data according to specified standards from the databases of the Cadastre Committee and the State Register of Legal Entities of the Ministry of Justice, which identify transactions of legal entities that may reflect undeclared concentrations.  At the same time, due to the interoperability of the e-Compete system with the electronic databases of the State Revenue Committee, data on prices of consumer goods in main commercial networks are retrieved through web services and respective reports are generated using the system’ Power BI tool. This helps to monitor prices on a daily basis to detect possible cases of abusing dominant market position or unjustified price increases, decreases, or price maintenance, resulting from anti-competitive agreements. The results of price monitoring are automatically published on the Commission's official website. | II | | I | | | | II | |  | |  | | |
|  | | The technical specifications of screening software and other tools to detect violations in the market are developed. | | | | Electronic tools are introduced and put into practice. | | 1. User-friendly and comprehensive guidelines are developed for the screening software and other violation detection tools.  2. The capacities of the Competition Protection Commission to effectively utilize these tools are continuously developed. | |  | | |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | | | | | | | | |

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| **Activity 4.12**  Modernize and improve the procurement planning system. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | 2025 | 2026 | 1. Uniform specifications for the main products purchased by customers have been developed and legally enacted.  2. A catalog of main consumer goods with unified characteristics has been developed.  3. The system has been introduced and put into in practice. | Available legal acts  Semi-annual and annual monitoring reports  Available technical specifications | RA Ministry of Finance |  |
| A major problem in the sector continues to be the practice of adapting technical specifications and other criteria defined in public procurement calls to specific organizations, which helps the latter to win the tenders in the absence of clear criteria, at least for the main products.  In recent years, the Ministry of Finance has developed mechanisms to combat the aforementioned vicious practice. However, they are not effective, as evidenced by the reports received via the Bizprotect whistleblowing platform run by the Armenian Lawyers’ Association.[[1]](#footnote-1) | II | I | | II | |  |  |
|  |  | |  | | Uniform specifications are developed and applied for the main products purchased by customers. |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 4.13**  Continuously improve the systems of transparency and publicity of the public procurement process. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | 2025 | 2026 | 1. The terms of reference to introduce or upgrade the electronic tools have been developed and approved.  2․ New smart anti-corruption systems/tools are put into practice. | Press releases, media publications  Semi-annual and annual monitoring reports | RA Ministry of Finance | Corruption Prevention Commission (upon consent)  RA Ministry of Justice  RA Ministry of High-Tech Industry |
| Currently, e-procurement covers all stages of procurement, including the contract execution. Key data on procurement processes, including contract execution, are published and updated in the official procurement e-bulletin. However, it is necessary to further improve the transparency and publicity of public procurement processes through introducing new smart anti-corruption tools and interoperability systems. | II | I | | II | |  |  |
|  |  | | The technical specifications for the existing smart tools or introducing new systems are developed. | | Anti-corruption smart tools are upgraded or new tools are introduced. |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 4.14**  Enhance and improve public procurement accountability mechanisms to foster public and private sector confidence in the procurement process. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | | 2025 | 2026 | 1․ The plan for awareness-raising activities has been developed and approved.  2․ By the end of 2026, at least 18 awareness-raising campaigns have been organized and conducted, including via mass media and social media platforms. | Press releases  Media publications  Semi-annual and annual monitoring reports | RA Ministry of Finance | RA Ministry of Justice  Corruption Prevention Commission (upon consent) |
| There are controversial opinions about public procurement among the public and businesses. This area is always associated with corruption risks. Therefore, it is necessary to take active steps towards increasing and strengthening confidence in the procurement process among the public and the private sector. | II | I | | II | |  |  |
|  | Awareness-raising plan is developed to increase and strengthen confidence in the procurement process among the public and the private sector. | | At least four awareness-raising campaigns are organized and conducted, including via mass media and social media platforms. | | At least six awareness-raising campaigns are organized and conducted, including via mass media and social media platforms. | At least eight awareness-raising campaigns are organized and conducted, including via mass media and social media platforms. |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **INCREASING THE EFFECTIVENESS OF DETECTING CORRUPTIVE ECONOMIC OFFENSES** | | | | | | | | | | |
| **Activity 4.15**  Continuously develop and enhance institutional structures and mechanisms to increase the effectiveness of detecting corruptive economic offenses. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | 2026 | 1. By the end of 2026, at least 18 training sessions have been organized and conducted, with duration of at least four academic hours each. As a result of the knowledge post-test, the trainees demonstrated at least 80% knowledge proficiency.  2. Guidelines for conducting investigations have been developed. | Semi-annual and annual monitoring reports  Reports on delivered trainings  Knowledge assessment reports and employee surveys  Press releases  Media publications | RA Academy of Justice | The State Supervision Service (upon consent)  RA Audit Chamber (upon consent)  RA Investigative Committee (upon consent)  RA Prosecutor General’s Office (upon consent)  The Anti-Corruption Committee (upon consent) |
| It is necessary to continuously improve the capacities of the officials of the Prosecutor General's Office, the Anti-Corruption Committee, the Investigative Committee, the Audit Chamber, the State Supervision Service, and the Competition Protection Commission to detect corruption-related economic offenses. | II | I | II | |  | |  |
|  |  | 1․ The capacities of the officials of the Prosecutor General's Office, the Anti-Corruption Committee, the Investigative Committee, the Audit Chamber, the State Supervision Service, and the Competition Protection Commission for detecting corruption-related economic offenses are enhanced. At least four training sessions are organized and conducted.  2. Guidelines and protocols for investigating corruption-related economic offenses are developed to ensure uniform investigative practices across all relevant bodies. | | The capacities of the officials of the Prosecutor General's Office, the Anti-Corruption Committee, the Investigative Committee, the Audit Chamber, the State Supervision Service, and the Competition Protection Commission for detecting corruption-related economic offenses are enhanced. At least six training sessions are organized and conducted. | | The capacities of the officials of the Prosecutor General's Office, the Anti-Corruption Committee, the Investigative Committee, the Audit Chamber, the State Supervision Service, and the Competition Protection Commission for detecting corruption-related economic offenses are enhanced. At least eight training sessions are organized and conducted. |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | | | |

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| **STRATEGIC GOAL 5: ENHANCING ANTI-CORRUPTION MONITORING AND EVALUATION SYSTEM** | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **5.1 IMPROVING ANTI-CORRUPTION MONITORING AND EVALUATION MECHANISMS** | | | | | | | | |
| **EXPECTED RESULTS** | | 1. The monitoring and evaluation process is digitized, and annual and semi-annual monitoring and evaluation reports are implemented through the anti-corruption monitoring and evaluation electronic platform. 2. The discretionary provisions of the monitoring and evaluation procedure are clarified. 3. All anti-corruption bodies are involved in the Anti-Corruption Policy Council and seven seats reserved for CSOs are filled. 4. The methodology for evaluating the impact and public perception of anti-corruption efforts is established; an authorized body and regulations are set to conduct public opinion surveys. 5. The format and procedure for donor coordination in the area of anti-corruption are approved. 6. The department responsible for anti-corruption policy development and monitoring has sufficient human resources and tools to effectively implement its activities. The department staff is provided with adequate social benefits. 7. Anti-corruption program officers are fully aware of their functions. 8. Regular trainings are conducted for CSOs working in anti-corruption. | | | | | | | | |
| **EXPECTED IMPACT** | | 1. Monitoring and evaluation processes are simplified. 2. The methodology for monitoring and evaluating allows for both qualitative and quantitative assessment of the anti-corruption strategy and its action plan. 3. The regulations for Anti-Corruption Policy Council membership are clear and ensure its inclusiveness. 4. Surveys are conducted to assess the impact and public perception of anti-corruption efforts. The survey results are summarized in monitoring reports and/or incorporated in the anti-corruption policy. 5. Donor activities in anti-corruption are effectively coordinated. 6. As a result of institutional strengthening, the department responsible for anti-corruption policy development and monitoring effectively implements its functions. 7. Anti-corruption program officers effectively ensure the coordination of anti-corruption programs and relevant international obligations within agencies. 8. Capacities of CSOs working in anti-corruption are strengthened. | | | | | | | | |
| **Activity 5.1**  Launch an electronic platform for anti-corruption monitoring and evaluation. | Baseline Data | Performance Targets | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | 2025 | 2026 | 1. The anti-corruption monitoring platform has been modified by the relevant organization, and its preliminary version is submitted to the RA Ministry of Justice.  2. The bodies responsible for the implementation of the Anti-Corruption Strategy are registered and manage their pages on the electronic anti-corruption monitoring and evaluation platform.  3. A survey among the users of the anti-corruption monitoring and evaluation electronic platform has shown that at least 80% of the respondents reported no significant obstacles in operating the platform. | Semi-annual and annual monitoring reports  Electronic platform for monitoring and evaluation used by the responsible bodies | RA Ministry of Justice | RA Ministry of High-Tech Industry |
| The current anti-corruption monitoring platform, available at <https://anti-corruption.gov.am/am/>, has limited functionality. It only allows downloading ready reports and posting press releases. The platform does not provide possibility to generate reports, download additional information, or conduct evaluations.  Development of a new anti-corruption platform launched in 2022 but was not completed. | II | I | II |  |  |
|  |  | 1. Works on developing the electronic platform for anti-corruption monitoring and evaluation have launched.  2. The terms of reference for the anti-corruption monitoring and evaluation platform are revised. | The electronic platform for anti-corruption monitoring and evaluation is launched. |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | |

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| **Activity 5.2**  Improve the procedure of monitoring and evaluation. | Baseline Data | Performance Targets | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | 2025 | 2026 | 1. The methodological documents for monitoring and evaluation have been revised and approved.  2. The Anti-Corruption Strategy includes improved regulations for monitoring and evaluation. | Available legal acts  Semi-annual and annual monitoring reports  Report on implementing the recommendations of the OECD’s 5th round of monitoring by the Republic of Armenia | RA Ministry of Justice | Specialized CSOs (upon consent) |
| The expected results of the Anti-Corruption Strategy are tracked annually through factor level monitoring and the evaluation includes the main indicators reflecting the Strategy results.  Factorial monitoring and evaluation are carried out not only by the Ministry, but also by the Implementing Bodies.  The assessment is discretionary and lacks any standard to measure the degree of completion. | II |  | II |  |  |
|  | The methodological documents for monitoring and evaluation are revised to address all potential gaps and enhance the methodology for monitoring and evaluation. | The methodological documents for monitoring and evaluation are approved and the electronic platform is updated respectively. |  |  |
| **Source of funding** | Sources not prohibited by legislation | | | | | | | | | |

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| **Activity 5.3**  Review the regulations on the activities and inclusiveness of the Anti-Corruption Policy Council. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | | 2026 | 1. The amendments to Prime Minister's Decision No. 808-N of June 24, 2019 “On Establishing an Anti-Corruption Policy Council, Approving Council’s Composition and Procedure for Operation, the Procedure for Competition and Rotation of Non-Governmental Organizations Included in the Council and Repealing Decision of the RA Prime Minister No 300-N of 18 April 2015” have been approved.  2. The Anti-Corruption Policy Council has filled all seats designated for CSOs. | Available legal acts  Semi-annual and annual monitoring reports | RA Ministry of Justice | Anti-Corruption Policy Council members (upon consent) |
| Prime Minister’s Decision No. 808 of June 24, 2019, that regulates the activities of the Anti-Corruption Policy Council, restricts the number of CSOs that can be included in the Council. Furthermore, there is a need to clarify the regulations and discretionary provisions for conducting a competition among non-governmental organizations.  At the same time, not all anti-corruption bodies are included in the Anti-Corruption Policy Council. | II | I | | II |  | |  |
|  |  | | 1. Legal acts are drafted to regulate the activities of the Anti-Corruption Policy Council and amend other legal acts to ensure the inclusion of all stakeholders.  2. The drafts are discussed with the members of the Anti-Corruption Policy Council. | Amendments to the legal acts regulating the activities of the Anti-Corruption Policy Council are adopted.  To ensure inclusiveness, a competition was held to fill the seats designated for CSOs in the Anti-Corruption Policy Council. | |  |
| **Source of funding** | Funding not required | | | | | | | | | | | |
| **Activity 5.4**  Establish mechanisms to conduct regular surveys on the fight against corruption, including the impact of anti-corruption actions, and ensure their implementation. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | 2026 | | 1. The methodology for assessing the impact of the fight against corruption and implementing public opinion surveys has been approved by the relevant legal act and put into practice.  2. The legal regulations on executing regular surveys and the relevant authorized body are established by the legal act.  3. A survey to assess the impact of and public perceptions on anti-corruption efforts is conducted at least annually; its results are summarized in the annual reports on monitoring and evaluation of the anti-corruption strategy. | Available legal acts  Annual report on monitoring and evaluation | RA Ministry of Justice | Corruption Prevention Commission (upon consent) |
| Regular surveys to assess the impact and public perception of anti-corruption efforts are not conducted, and there is no methodology for conducting such surveys. | II | I | | II |  |  | |
|  |  | | A methodology is developed to assess the impact of the fight against corruption, including the impact of anti-corruption actions.  Legal regulations are developed to execute regular surveys and define the relevant authorized body. | The methodology for assessing the impact of the fight against corruption, including the impact of anti-corruption actions is approved. The legal regulations on the surveys are adopted, and the body authorized to conduct them is defined. |  | |
| **Source of funding** | | Sources not prohibited by legislation | | | | | | | | | | |
| **SPECIFIC OBJECTIVE** | | **5.2 STRENGTHENING THE INSTITUTIONAL SYSTEM OF ANTI-CORRUPTION MONITORING AND EVALUATION** | | | | | | | | | | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 5.5․**  Strengthen the capacity of anti-corruption program officers by conducting trainings and developing guidelines. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | 2026 | | 1. The needs of at least 80% of state and local government bodies responsible for anti-corruption programs have been assessed.  2. At least 80% of state bodies and local government bodies responsible for anti-corruption programs have participated in trainings with duration of at least four academic hours. As a result of the knowledge post-test, the trainees demonstrated at least 90% knowledge proficiency.  3. At least one guideline for anti-corruption program officers has been developed and approved. | Semi-annual and annual monitoring reports  Publications in the mass media and social media platforms  Available guidelines | RA Ministry of Justice | State administration bodies  Office of the Prime Minister  Office of the President of the Republic of Armenia (upon consent)  Staff of the National Assembly (upon consent)  Independent and autonomous bodies (upon consent)  Local self-government bodies (upon consent) |
| Only one training was held for anti-corruption program officers in 2023, and there are no guidelines for their activities. | II | I | | II |  |  | |
|  | Guidelines for the activities of anti-corruption program officers are developed, disseminated, and published. | | Trainings are conducted for anti-corruption program officers.  Guidelines for the activities of anti-corruption program officers are approved. |  |  | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | |
| **Activity 5.6**  Provide a mechanism to coordinate the regular activities of donors. | Baseline Data | Performance Targets | | | | | | | Outcome Indicators (quantitative and qualitative) | Verification Means | Implementing Body | Co-Implementing Body |
| 2023 | 2024 | | | 2025 | 2026 | | 1. The procedure and format for donor coordination in the area of anti-corruption have been approved by the relevant order of the RA Minister of Justice.  2. After the approval of the aforementioned act, at least three donor coordination meetings are held annually with subsequent publication of meeting results. | Available legal acts  Minutes of donor coordination meetings  Semi-annual and annual monitoring reports | RA Ministry of Justice | Office of the Deputy Prime Minister Mher Grigoryan |
| Although several donor meetings were held with involvement of other stakeholders, joint meetings of donors and stakeholders did not take place regularly, and mechanisms for effective donor coordination are not defined. | II | I | II | |  |  | |
|  |  | A discussion is held with donors and other stakeholders to coordinate donor activities in the area of anti-corruption. Based on the results of this discussion, donor coordination format and procedure are developed. | |  |  | |
| **Source of funding** | Other sources not prohibited by legislation | | | | | | | | | | | |

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|  | Although several donor meetings were held with involvement of other stakeholders, joint meetings of donors and stakeholders did not take place regularly, and mechanisms for effective donor coordination are not defined. |  | A discussion is held with donors and other stakeholders to coordinate donor activities in the area of anti-corruption. Based on the results of this discussion, donor coordination format and procedure are developed.  The procedure and format for donor coordination in the area of anti-corruption is developed and agreed with donors and stakeholders.  Donor coordination meeting is held and the results are documented. | Donor coordination meeting is held and the results are documented. | Donor coordination meeting is held and the results are documented. |  |  |  |  |

1. <https://bizprotect.am/am/success-stories/show/18> [↑](#footnote-ref-1)