

SPECIAL INVESTIGATION SERVICE
OF THE REPUBLIC OF LITHUANIA
ANNUAL REPORT

2022

CONTENTS

FOREWORD	4
ASSESSING CHANGES IN THE ANTI-CORRUPTION ENVIRONMENT	6
CRIMINAL PROSECUTION	11
Reports from individuals	12
Pre-trial investigations initiated	15
Pre-trial investigations completed	19
Court judgments	23
Tracing and recovery of assets	26
PREVENTION OF CORRUPTION AND ANALYTICAL ANTI-CORRUPTION INTELLIGENCE	28
Implementation of the Law on Prevention of Corruption	29
Provision of information on persons	31
Identifying threats and risks of corruption	32
Provision of information for the protection of objects important for national security	47
Issues in creating the Lithuanian anti-corruption environment and challenges to be addressed	48
ANTI-CORRUPTION AWARENESS AND COMPETENCES	49
INTERNATIONAL COOPERATION	55
THE SERVICE IN NUMBERS	59



FOREWORD

The World Bank estimates that each year corruption costs \$2.6 trillion for the world¹, €900 billion² for the European Union Member States, and Lithuania does not add €4.4 billion annually to its gross domestic product³. *This is the probable cost of corruption.*

A case of corruption in the European Parliament when the Vice-President of the European Parliament was detained during the investigation. A major corruption scandal with more than ten highest-ranking public officials detained or removed from office in Ukraine, which is defending itself against the Russian military aggression. Cases of systemic corruption identified and investigated in Lithuania in the areas of healthcare, construction, bankruptcy administration, food veterinary services. *This is how corruption manifests itself in practice.*

The United States of America have approved the first U.S. Strategy on Countering Corruption by US President Joe Biden⁴. The European Commission has taken the initiative to prepare a European Anti-Corruption Di-

rective⁵. Lithuania has approved the National Agenda on the Prevention of Corruption. On 1 January 2022, a recast Law on Prevention of Corruption entered into force, amending the corruption prevention model that had been in place for almost 20 years. *These are the strategic actions taken to contain corruption.*

The Special Investigation Service of the Republic of Lithuania (hereinafter – the STT or the Service) is the key national anti-corruption law enforcement institution accountable to the President of the Republic of Lithuania and to the Seimas of the Republic of Lithuania. It celebrated its 25th year of activities in 2022. Today we are presenting the 2022 Annual Report with an overview of the main works carried out during the year. At the same time, by comparing the data presented in this Report with the data from the beginning of activities of the Service, we can get a clear understanding of the directions and trends in the performance development of the Service, as well as of the transformation of the anti-corruption environment in Lithuania – its achievements and future challenges.

¹ Source: <https://blogs.worldbank.org/governance/what-are-costs-corruption>

² Source: <https://www.greens-efa.eu/en/article/document/the-costs-of-corruption-across-the-european-union>

³ Source: <https://www.greens-efa.eu/files/doc/docs/e46449daadbfebc325a0b408bbf5ab1d.pdf>

⁴ Source: <https://www.whitehouse.gov/wp-content/uploads/2021/12/United-States-Strategy-on-Countering-Corruption.pdf>

⁵ Source: https://home-affairs.ec.europa.eu/news/european-commission-asks-publics-view-fight-against-corruption-2023-01-20_en

Considering the activities and results of the Service in the areas of criminal prosecution, prevention, analytical intelligence or anti-corruption awareness-raising in the longer term, the Service places major emphasis on the core performance outcome – anti-corruption change in the country. Each pre-trial or analytical investigation, each corruption risk analysis or anti-corruption assessment identifies the areas, institutions, procedures or specific individuals that must change or be changed in order to strengthen the resilience of the State to corruption. And with each anti-corruption event for civil servants, businesses and young people, the Service aims to coordinate, involve, encourage, advise or assist those who make decisions in the State today and those who will do so tomorrow.

A separate direction of activities of the Service is international cooperation. With 25 years of experience, the Service feels obliged to share this experience with other countries and has the opportunity to take a leading role in shaping the anti-corruption agenda in Europe and even globally.

In the Report, you will find more information about the EU-funded Twinning projects implemented successfully by the Service, about the activities of the Service as a leader of the EPAC/EACN network of anti-corruption authorities and police oversight bodies from 38 European states, as well as about the successful activities of the Service in order to host the International Anti-Corruption Conference (IACC) in Lithuania in 2024.

You are invited to read the 2022 Annual Report of the Special Investigation Service, analyse its data, compare it with other information available to you and draw your own evidence-based conclusions.

And, at the same time, let us take a moment and enjoy living in Lithuania that is so rapidly becoming more transparent.

Žydrūnas Bartkus
Director of the Special Investigation
Service of the Republic of Lithuania



ASSESSING CHANGES IN THE ANTI-CORRUPTION ENVIRONMENT

The anti-corruption initiatives implemented in 2022 enabled the strengthening of measures for the formation of evidence-based anti-corruption sentiments and anti-corruption awareness raising. Corruption in the country is increasingly under control, but remains a problem in some areas. In addition, the ongoing war in Ukraine poses challenges in the strategic sectors of national security. The existing corruption risks necessitate vigilance and monitoring of the situation inside the country, assessment of the activities of existing companies and potential investors, and additional actions to strengthen both the anti-corruption environment in Lithuania and mutual cooperation with foreign states in international business transactions.

Corruption remains a problem in Lithuania, but its scale is declining and control is strengthening

The score of Lithuania in the Corruption Perceptions Index 2022 (hereinafter – the CPI) of international non-governmental organisation Transparency International has increased for the second year in a row. In 2022, Lithuania scored 62 out of 100 and ranked 33rd in the list of 180 countries⁶. Among the 27 Member States of the European Union (hereinafter – the EU), Lithuania is in the 12th place (compared to the 13th place a year ago) and is coming closer to the EU average of 64 points and to the 2025 target of 70 points set in the National Agenda for the Prevention of Corruption.

Sociological survey data, together with the systemic corruption surveys that are undertaken each year, suggest that, although there is a lack of positive change in certain areas of anti-corruption, corruption is being controlled more and more effectively in the State.

The positive change in the control is also confirmed by international assessments. In 2021, Lithuania achieved a score of 80 in the Control of Corruption Index constructed by the World Bank⁷. In 2022, prosecution of abuse of office also received the highest score (10 points)⁸.

According to the Eurobarometer, the perception of the prevalence of corruption in Lithuania is worse than in the EU and neighbouring states. However, it

is important to note that the national indicator continues to improve steadily, with the perceived prevalence of corruption decreasing by more than 10% since 2019⁹.

Lithuania, together with the Czech Republic, Greece, Croatia and Latvia, remains among the leading EU Member States with the highest number of residents who personally know people who take or have taken bribes¹⁰. There are more people in Lithuania who would also be willing to give a gift, offer a service or give money in return for a public service¹¹. Compared to 2019, the number of such persons has remained almost unchanged (increased by 2%), however, a significant positive change is visible in the long term¹².

Similar changes are also observed in relation to the tolerance of corruption among the residents. According to surveys, the number of people who tolerate corruption has increased since 2019 (2% more), but the overall trend is downwards for the period 2013-2022¹³.

It should be noted that of all the respondents who state that corruption is widespread in the state, 74% claim they have not been personally affected by corruption. This is also reflected in their experience in the last 12 months – only 7% of the respondents have witnessed or experienced a case of corruption¹⁴. Thus, the experience of corruption in the state is secondary or symbolic (for example, through the information presented on the media and social networks).

⁶ Lithuania was scored 61 out of 100 possible points in 2021, ranking 34th in the world. 2021 Corruption Perceptions Index. Source: <https://www.transparency.org/en/cpi/2021>.

⁷ In 2021, the indicator of Lithuania for the control of corruption was 80.3% (79.3% in 2020). Worldwide Governance Indicators, 2022. Source: <https://info.worldbank.org/governance/wgi/Home/Reports>.

⁸ The area of prosecution scored 10 out of potential 10 in 2020, 9 in 2018 and 8 in 2016. The survey is conducted every two years. Bertelsmann Stiftung. Transformation Index, 2022. Source: <https://bti-project.org/en/reports/country-report/LTU>.

⁹ Lithuania's indicator in 2022 was 81% (92% in 2019, 93% in 2017, 95% in 2013), Latvia's – 78%, Poland's – 55% and Estonia's – 43%, while the EU average was 68%. European Commission (EC) Special Eurobarometer 523, 2022. Source: <https://europa.eu/eurobarometer/surveys/detail/2658>.

¹⁰ 24% of residents was like this in Lithuania in 2022, compared to 34% in Greece, 25% in Latvia and 24% in the Czech Republic and Croatia. EC Special Eurobarometer 523, 2022. Ibid.

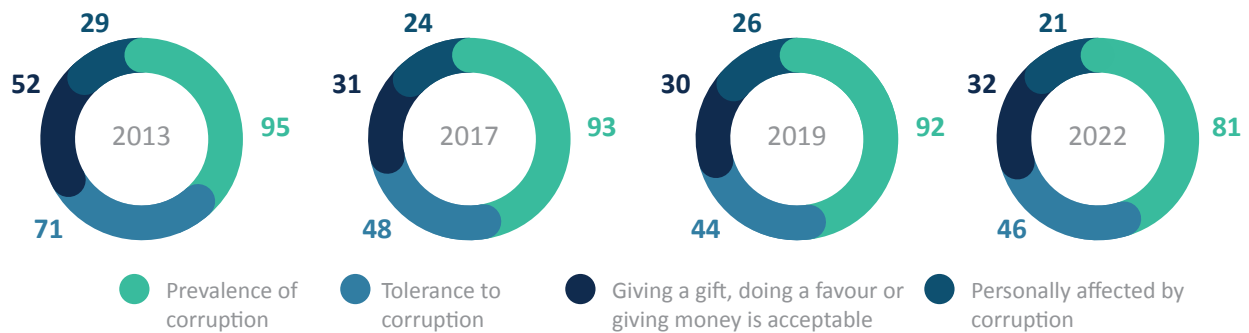
¹¹ In 2022, 40% of respondents in Lithuania would be willing to give a gift (28% in the EU), 32% would be willing to do a favour (27% in the EU) and 24% would be willing to give money (17% in the EU). EC Special Eurobarometer 523, 2022. Ibid.

¹² Giving a gift, doing a favour or giving money in general was considered acceptable by 32% of residents in 2022, 30% in 2019, 31% in 2017 and 52% in 2013. EC Special Eurobarometer 523, 2022. Ibid.

¹³ In 2022, 46% of residents tolerated corruption, 44% in 2019, 48% in 2017 and 71% in 2013. EC Special Eurobarometer 523, 2022. Ibid.

¹⁴ EC Special Eurobarometer 523, 2022. Ibid.

Figure 1. EC Special Eurobarometer 523 survey of residents, %



Reduction in the number of registered corruption-related criminal offences

In 2022, the downward trend in the number of registered corruption-related offences continues¹⁵. Compared to 2021, there is a 16% decrease in the total number of corruption-related offences, a 34% change since 2017¹⁶. The most considerable decrease is in the number of criminal offences related to trading in influence (Article 226 of the CC) – 41%¹⁷ and to abuse of office (Article 228 of the CC) – 32%¹⁸. It is important to note that the upward trend in bribery rates observed over the last three years has stopped this year. It can be assumed that such changes are the result of increased anti-corruption awareness of the people, intolerance towards corruption and changing attitudes towards bribes as an effective solution to problems.

In the opinion of residents, the main areas and processes where corruption is most prevalent remain unchanged

The sectors most exposed to the risk of corruption continue to be the health system, political parties, national, regional or local authorities, different con-

trol and licensing bodies, as well as public tendering and building permit processes¹⁹.

Notice should be made of positive trends in relation to bribery in the health sector. Although we are still ahead of the EU average, the number of persons giving a bribe, a gift to a healthcare professional or a donation to a hospital in Lithuania has been decreasing every year and has decreased three times since 2013²⁰.

Anti-corruption developments in the judiciary assessed positively

After the investigations of potential large-scale corruption offences in the judiciary, the National Courts Administration and the Judicial Council continue to implement the recommendations given by the STT on the initiatives to strengthen the anti-corruption environment, which has been positively assessed by the European Commission²¹.

In 2022, the independence of the judiciary from the influence of interest groups was perceived by residents as average²² and by business representatives as good²³. Although these scores are lower than in the previous years, confidence in the judiciary is not decreasing.

¹⁵ During the reporting period, 16% fewer cases of failure to perform official duties (Article 229 of the CC), 5% – graft (Article 227 of the CC), 2% – bribery (Article 225 of the CC), and no cases of unlawful registration of rights over property (Article 228-1 of the CC) were registered in 2022. Data of the Departmental Register of Criminal Offences as of 17 January 2023, Information Technology and Communications Department under the Ministry of the Interior of the Republic of Lithuania. Source: <https://ird.lt/lt/paslaugos/tvarkomu-valdo-mu-registru-ir-informaciniu-sistemu-paslaugos/nusikalstamu-veiku-zinybinio-registro-nvzr-atviri-duomenys-paslaugos>.

¹⁶ 497 in 2022, 595 in 2021, 523 in 2020, 516 in 2019, 563 in 2018, 762 in 2017.

¹⁷ 64 in 2022, 109 in 2021.

¹⁸ 70 in 2022, 104 in 2021.

¹⁹ 69% of residents say that corruption is most prevalent in the healthcare system, 57% – in political parties, 56% – among politicians at national, regional or local level and among officials managing public procurement tenders, 53% – among officials issuing building permits, and 49% – among inspectors (health and safety, construction, labour, food quality, hygiene control and licensing). Special Eurobarometer 523, 2022. Ibid.

²⁰ 7% in 2022 (EU 4%), 10% in 2019 (EU 5%), 12% in 2017 (EU 4%) and 21% in 2013 (EU 5%). EC Special Eurobarometer 523, 2022. Ibid.

²¹ EC 2022 Rule of law report. Source: https://commission.europa.eu/publications/2022-rule-law-report-commun-ication-and-country-chapters_en

²² In 2022, 52% of residents consider the judiciary is or more likely is independent (55% in 2021, 52% in 2020, 49% in 2016). EU Justice Scoreboard 2022. Source: https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/upholding-rule-law/eu-justice-scoreboard_it ²³ In 2022, 61% of business representatives say that courts and judges are independent (60% in 2021, 66% in 2020, 48% in 2016). EU Justice Scoreboard 2022. Ibid.

National institutions are perceived by residents to be at greater risk of corruption

Unlike in 2013–2019, in 2022 residents perceived that corruption was more widespread in national public institutions than in the institutions functioning on the regional or local level²⁴. Transparency International notes that national institutions that are susceptible to corruption pose a direct and indirect threat to a country's territorial integrity, democratic principles and economic growth²⁵.

In addition to the internal resilience of institutions, the rule of law must be implemented in order to ensure an effective corruption-resilient system. As far as the ensuring of this principle is concerned, Lithuania's score in 2022 is 0.76 (where 0 is low and 1 is high ensuring of the rule of law), ranking 18th in the world out of 140 countries scored and 11th in the EU. Thus, the implementation of the principle of the rule of law is rated quite high in Lithuania.

In the context of some public sector institutions, the legislative power continues to face the highest risk of corruption, although this risk has decreased compared to 2021. Positive developments are visible in the executive power and the judiciary, while the situation in the military and the police has remained unchanged²⁶. Although the resilience of the national defence sector to corruption is assessed high, the ongoing war in the region calls for further assessment of the anti-corruption measures in place in order to manage the risks likely in the future, for example, in the acquisition or development of military equipment.

The risk of exposure to corruption for Lithuanian business is relatively low

The problem of corruption for doing business in Lithuania is no longer as high as it was in 2013–2015, although last year it was more manifest than in 2017–2019²⁷. In terms of the direct exposure of Lithuanian business representatives to corruption in the country, only 5% have encountered a situation where someone demanded or expected a gift, service or financial reward from their

business representatives in exchange for certain permits or services²⁸.

The low risk of Lithuanian business to encounter bribe requests is also revealed by the data of other international studies. The Bribery Risk Matrix has given Lithuania a score of 25 out of 100 (where 1 indicates low risk and 100 – high risk), ranking it 23rd out of 194 countries scored and 10th in the EU. Lithuania's score is higher than the average of the EU Member States, Poland and Latvia, but lower than Estonia, which ranks 6th in the EU and 14th worldwide²⁹.

Public procurement processes are more transparent but need improvement

A smaller share of business representatives in 2022 said that corruption had prevented their company from winning a public procurement tender in the last three years³⁰. Nevertheless, there are still weaknesses in the public procurement system.

At the same time, it should be noted that the introduction of adequate corruption control and prevention levers in public procurement procedures reduces the risks of vulnerability of States, as public procurement often becomes one of the areas through which non-transparent financial interest groups (some of them with cooperation links with business or government representatives of third countries) can carry out state capture, thereby weakening the national security. Thus, the indicators showing an increase in the transparency of public procurement procedures in Lithuania suggest that the riskiness of this sector is well managed from a national security perspective.

Corruption risks relevant in strategic national security sectors

The risk of foreign bribery in Lithuania is assessed as low and manageable according to the CPI assessment, however, considering the context of the war in Ukraine, it is necessary to continue to assess the activities of businesses operating in Lithuania and potential investors, as well as to expand inter-institutional co-operation with foreign partners in investigating

²⁴ 83% of the respondents perceived corruption to be widespread in national institutions in 2022, compared to 79% in 2019, 82% in 2017 and 84% in 2013. In regional and public institutions: 78% in 2022, 82% in 2019, 86% in 2017 and 86% in 2013. EC Special Eurobarometer 523, 2022. Source: <https://europa.eu/eurobarometer/surveys/detail/2658>.

²⁵ 2022 Corruption Perceptions Index by Transparency International. Source: <https://www.transparency.org/en/cpi/2022>.

²⁶ In 2022, the risk of corruption in the executive branch is 0.68 (0.65 in 2021), in the judiciary – 0.86 (0.83 in 2021), in the police and the military – 0.75 (the same in 2021) and in the legislature – 0.59 (0.54 in 2021). Rule of Law Index 2022 by World Justice Project. Source: <https://worldjusticeproject.org/rule-of-law-index/global/2022>.

²⁷ In 2022, 22% of business representatives identified corruption as a problem, compared to 15% in 2019, 21% in 2017, 28% in 2015 and 36% in 2013. EC Flash Eurobarometer 2022 Source: <https://europa.eu/eurobarometer/surveys/detail/2657>.

²⁸ In 2019, the figure was 7%, in 2017 it was also 7%, in 2015 it was 21% and in 2013 it was 8%. EC Flash Eurobarometer 507, 2022. Ibid.

²⁹ The EU average is 28, while Poland's score is 37 (46th in the world and 23rd in the EU), Latvia's is 28 (25th in the world and 12th in the EU) and Estonia's is 18. 2022 Bribery Risk Matrix by TRACE. Source: <https://www.traceinternational.org/trace-matrix#23>.

³⁰ 27% in 2022, 37% in 2019, 26% in 2017 and 39% in 2015. EC Flash Eurobarometer 507, 2022. Source: <https://europa.eu/eurobarometer/surveys/detail/2657>.

potential corruption-related offences internationally. According to the data of the STT, relevant, although controlled, are the risks associated with investments involving Belarusian and Russian citizens and companies (acting directly or indirectly through intermediaries) and their aspiration to establish a foothold in strategic sectors important to national security (in particular, in energy, transport and information technologies), as this would enable such companies, often associated with non-democratic regimes, not only to gain access to sensitive information about the critical infrastructure of the Republic of Lithuania, but also to protract the implementation processes of important projects by involving into litigation.

Activities of investors operating in tax haven zones are also relevant to the national security situation. There are risks that business entities of these countries are used to circumvent EU sanctions by concealing the true origin of investments.

Strong civil society makes a significant contribution to transparent Lithuania

An important element of positive anti-corruption changes is a high anti-corruption potential of society and a strong empowered civil society. Although the anti-corruption potential of Lithuanian society still faces some challenges, there is a growing number of indicators showing an improvement in the situation.

The media in Lithuania, together with NGOs, have received the highest score out in the four areas of the study measuring the risk of business exposure to bribery. Civil society has been assessed as having oversight capacity and ability to report corruption risks and cases³¹. The independence of the media has also been confirmed by the 2022 World Press Freedom Index, where Lithuania has been ranked 9th among 180 countries worldwide (28th in 2021) and 7th in the EU. Compared to its neighbours, only Estonia ranks higher – 4th in the world and 3rd in the EU³².

The growing public involvement in the creation of the anti-corruption environment is also reflected in the increasing number of reports received by the STT each

year on potential corruption-related criminal offences. In addition, according to the data of Eurobarometer, Lithuanian residents would be most likely to report potential corruption-related criminal offences to the police, the specialised anti-corruption body and the media. In this respect, Lithuania ranks third in the EU in terms of trust in the anti-corruption institution. Therefore, these trends suggest a growing public confidence in the competence of the STT.

On the other hand, many people are still reluctant to report corruption because they think it will be difficult to prove and/or pointless to report because those responsible will not be punished. Thus, the decision not to report is mostly influenced by a lack of confidence in the administration of justice and a belief in the prevailing impunity. In addition, there is a concern that reporting corruption will lead to trouble with the police or other authorities³³. Thus, in this case, it is important that the authorities responsible for the protection of whistleblowers proactively communicate about the safeguards provided by the legal regulation to persons who report corruption cases.

It is worth noting that Lithuanian business representatives are more positive than EU representatives about the results of the criminal prosecution of corruption offences by the authorities. According to the EC Flash Eurobarometer 507, a large majority of respondents believe that people or businesses engaging in corrupt practices would be caught by or reported to the police or prosecutors (63%), would face charges and go to court (63%). However, the respondents have much less confidence in the authorities administering justice – only a third of the respondents believe that the accused would be heavily fined or imprisoned by a court (31%)³⁴.

It can be assumed that greater confidence in criminal prosecution and, in particular, in court decisions may encourage the public to contribute more actively to anti-corruption activities and the implementation of anti-corruption measures, and to report the cases of potential bribe coercion.

³¹ 2022 Bribery Risk Matrix by TRACE. Source: <https://www.traceinternational.org/trace-matrix#23>.

³² Latvia ranks 22nd in the world (11th in the EU), Poland 66th (23rd in the EU). 2022 World Press Freedom Index by Reporters Without Borders. Source: <https://rsf.org/en/index>.

³³ EC Special Eurobarometer 523, 2022. Ibid.

³⁴ EC Flash Eurobarometer 507, 2022. Source: <https://europa.eu/eurobarometer/surveys/detail/2657>.



CRIMINAL PROSECUTION

Criminal prosecution is one of the four areas of activity of the Service aimed at detecting and promptly investigating serious and systemic corruption offences and returning assets to the State.

REPORTS FROM INDIVIDUALS

The Service investigates reports comprehensively: it aims not only to detect corruption-related offences that have been or are being committed and prevent them, but also to initiate preventive action by identifying potential corruption risk factors.

In 2022, the Service received 4,729 reports about potential corruption-related offences. On average, the Service received 19 reports each working day. This represents an increase of 8.7% compared to 2021. The increase in the number of reports shows the increasing intolerance of corruption by the public.

The share of anonymous reports received at the Service was only 4.7% of the total number of reports. This shows both the growing trust in the Service and the fact that the person who reports will be ensured confidentiality and protected from potential undue impact.

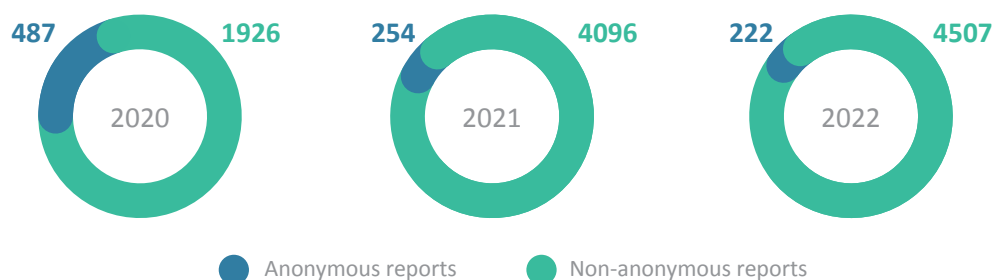
The largest number of reports about potential corruption-related violations of law have been received in the areas of health, environment, local self-government, and the administration of justice.

In addition to pre-trial investigations opened after STT officials analysed the reports, they also identified administrative, official and/or disciplinary misconduct, breaches of public interest, indications of conflict between public and private interests in the civil service, and corruption risk factors.

In 2022, 57 persons were rewarded with one-off cash incentives for the valuable information provided on corruption-related offences, or 37 persons more than in 2021. With the increase in the number of persons who reported valuable information about corruption-related offences, the total amount of cash incentives almost doubled – from EUR 20,300 in 2021 to EUR 42,900 in 2022.

On the basis of reports on corruption-related offences submitted by individuals, the Service commenced 28 pre-trial investigations in 2022, i.e. 5 pre-trial investigations more than in 2021.

Figure 2. **Reports received at the Service**



THE FOLLOWING REPORTS DEALT WITH BY THE STT IN 2022 ARE NOTEWORTHY

REPORT ON POTENTIAL ABUSE OF OFFICE IN CONFIRMING THAT THE MUNICIPAL INFRASTRUCTURE DEVELOPMENT FEE HAS BEEN PAID



Upon receipt of information that the responsible employees of the Administration of Vilnius City Municipality had potentially abused their office by not calculating and requesting the payable municipal infrastructure development fee, it has been identified that there were indications of abuse of office in the actions of the responsible employees of the Municipality Administration. The employees of the Municipality Administration, being aware that they had to calculate and request payment of the municipal infrastructure development fee, had not done so, however, noted in the Infostatyba information system of

building permits and state supervision of construction of the Republic of Lithuania that all the necessary documents and data had been submitted and issued the building permits.

As a result of the above-referred actions of the employees of the Municipality Administration, Vilnius City Municipality has potentially suffered considerable damage because it has not received the mandatory fees in the total amount of approximately €105,000. The pre-trial investigation is carried out by the Central Investigations Department of the STT.

REPORT ON POTENTIAL FALSIFICATION OF DOCUMENTS CERTIFYING SPECIAL KNOWLEDGE



Following a report received by the Service that a private legal entity was allegedly issuing documents certifying special knowledge training – statements, attestations, certificates – the actions to verify the information were undertaken and a decision was taken to open a pre-trial investigation on their basis. It has been identified that individuals provided potentially fictitious documents issued by the private legal entity to representatives of foreign state authorities carrying out security checks in order to confirm the capacity of the natural person

and/or legal entity holding the fictitious document to legally and properly implement projects of high-value construction and reconstruction works.

The pre-trial investigation initiated by the officials of the Complaints Division of the STT concerning the forgery of documents or possession of a forged document has been handed over to the Lithuanian Police according to the competence for further pre-trial investigation actions.

REPORT ON POTENTIAL CORRUPTION IN ORGANISING DRIVING TESTS



Following information that the responsible employees of the State Enterprise (VĮ) Regitra and associated persons were carrying out allegedly unlawful actions in order to create favourable conditions for interested persons to obtain a positive driving test result for an unlawful consideration, the actions to verify information were carried out and a decision to open a pre-trial investigation was taken on their basis. According to the data of the investigation, the driving examiners of VĮ Regitra kept accepting bribes from interested persons and intermediaries in order not to record critical errors so that there were no obstacles for these persons in passing the driving tests.

The investigation revealed that the potentially corruption-related criminal offences had been carried out systematically, persons used to pay bribes from €200 to €400 for the test passed. Notices of suspicion were served on 12 persons, of which 2 driving examiners of the Vilnius branch of VĮ Regitra, 3 intermediaries and 7 persons interested in passing the driving test. More than 30 potential criminal offences are under investigation. The pre-trial investigation initiated by the officials of the Complaints Division of the STT concerning unlawful corruption-related acts has been taken over by the Central Investigations Department of the STT.

REPORT ON POTENTIAL CORRUPTION IN THE TECHNICAL SUPERVISION OF WORKS



Following a report, a pre-trial investigation was opened into trading in influence. According to pre-trial investigation data, a representative of an engineering communications construction company allegedly demanded a bribe from the director of the construction object contractor for the signature of work completion certificates by the company's director who carried out the technical supervision of the works. It was suspected that a bribe had been allegedly demanded for the smooth technical super-

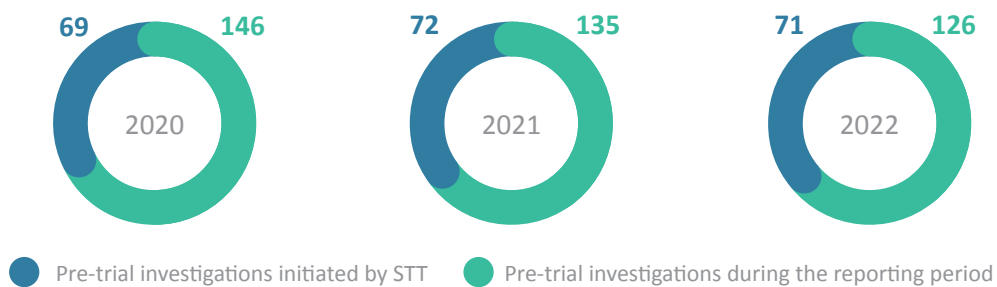
vision of an EU-funded construction object worth more than €400,000.

The director of the construction object contractor had handed over a bribe of €3,500 to an intermediary. The intermediary and the technical supervisor were detained by STT officials after the handover of the money. The persons were suspected of trading in influence and bribery. The pre-trial investigation is carried out by the STT Klaipėda Department.

PRE-TRIAL INVESTIGATIONS INITIATED

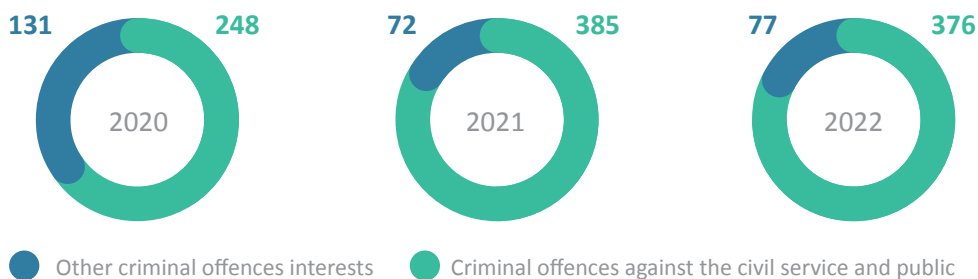
In 2022, the Service initiated 71 pre-trial investigations, 3 of which concerning systemic corruption. 126 pre-trial investigations were carried out by the Service in total in 2022.

Figure 3. **Changes in the number of pre-trial investigations carried out by the STT**



In 2022, 453 criminal offences were detected, almost the same as in 2021. The proportion of detected criminal offences against the civil service and public interests is similar.

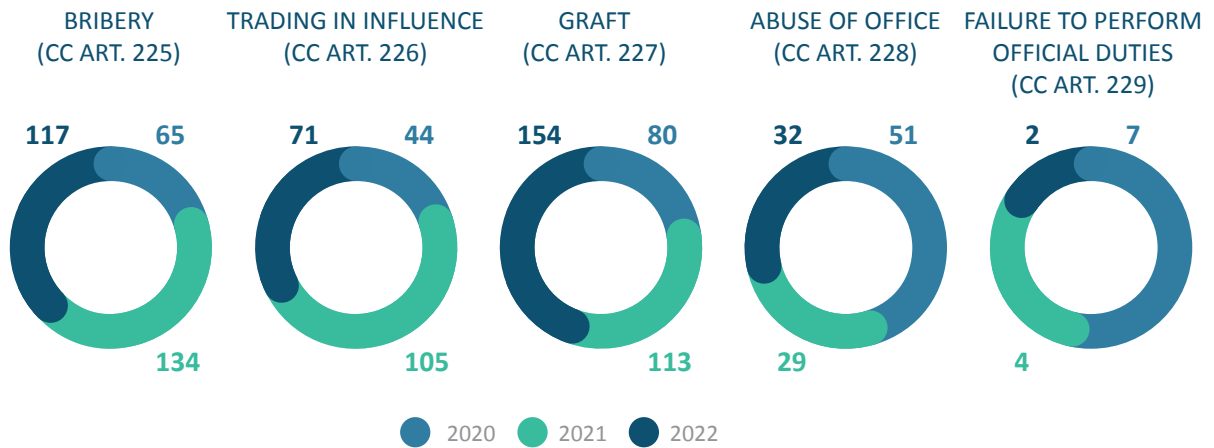
Figure 4. **Changes in the number of criminal offences detected**



In 2022, 101 serious offences (22% of the total number of offences detected) were detected, i.e. an increase of 16% compared to 2021, 279 less serious (62%), 73 other minor offences and criminal misdemeanours (16%).

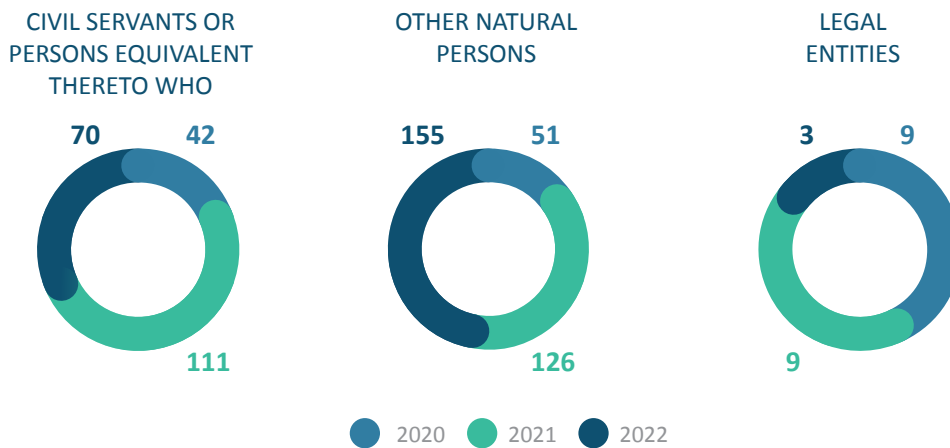
Detected cases of graft and abuse of office increased in 2022 by 36% and 10% respectively. The number of detected cases of bribery, trading in influence and failure to perform official duties has decreased.

Figure 5. **Changes in the number of criminal offences detected**



In 2022, 228 persons were suspected of having committed a criminal offence, of which 70 civil servants and equivalent persons, 155 other persons and 3 legal entities. The number of suspects, which more than doubled in 2021 compared to 2020, showed little change in 2022.

Figure 6. **Changes in the number of suspects**



THE FOLLOWING PRE-TRIAL INVESTIGATIONS INITIATED IN 2022 ARE NOTEWORTHY

INVESTIGATION INTO POTENTIAL BRIBERY IN THE ADMINISTRATION OF KAUNAS CITY MUNICIPALITY



The STT is conducting a pre-trial investigation into potential corruption-related criminal offences in the Administration of Kaunas City Municipality. It is suspected that the Director of the Administration of Kaunas City Municipality may have accepted a large bribe from a shareholder and director of the company in return for future favours and lawful acts in decisions regarding the performance and administration of the company's construction and related works contracts. Around a quarter of a million euro has been found in the residential and working premises of the Director of the Administration of Kaunas City Municipality, who is one of the suspects. Searches in the premises belonging to another suspect have led to the discovery of an even larger amount of

cash – around €400,000. In total, around €600,000 has been found and seized.

According to the pre-trial investigation data, the amount of the bribes could be up to €260,000. In the pre-trial investigation, which includes 18 potential criminal offences, notices of suspicion have been served on the Director of the Administration and on the director of the private company who tried to bribe him. This pre-trial investigation has been initiated by the STT Kaunas Department and is continued by officials of the Central Investigations Department. Significant additional information has been obtained after the public has been notified of this pre-trial investigation.

INVESTIGATION INTO A CORRUPTION SCHEME IN VETERINARY CONTROL



The Service has opened a pre-trial investigation into suspected large-scale bribery, trading in influence and graft in the State Food and Veterinary Service (SFVS). It is suspected that the SFVS Director and several civil servants in managerial positions had set up a criminal corruption scheme and, acting in an organised group and systematically banning the sale of products on Lithuanian and foreign markets or suspending the activities of companies, demanded and accepted bribes from business entities. The SFVS Director and his potential accomplices were detained, as it is suspected, at the moment of bribe giving and taking.

According to the pre-trial investigation data, it was likely that the amount of the bribes could be up to around €62,000. More than €300,000 have been found during searches of the suspected civil servants and their family members. Officials of the STT Central Investigations Department and the Šiauliai Department are investigating 15 potential criminal offences in this pre-trial investigation. Notices of suspicion have been served on 7 persons, including the Director of the SFVS, the Head of the SFVS Veterinary Medicines and Feed Division, the Director of the SFVS Šiauliai Department, and the former Head of Raseiniai Unit of the SFVS Kaunas Department.

INVESTIGATION CONCERNING CORRUPTION IN PUBLIC PROCUREMENT IN ŠILUTĖ DISTRICT MUNICIPALITY



A case of systemic corruption is investigated in the Administration of Šilutė District Municipality concerning potential abuse of official position for personal gain by creating exclusive conditions to certain companies and thereby excluding other business representatives from public procurement procedures, and distorting the principles of fair competition. The investigation is carried out concerning potential bribery, graft, and falsification of documents. It is suspected that the Director of the Administration of Šilutė District Municipality has taken advantage of his official powers and created exclusive conditions for construction companies to participate in and win public tendering procedures carried

out by the municipality. According to the pre-trial investigation data, the Director of the Administration had accepted bribes in the form of construction works and materials, which were used to furnish a house belonging to his family member.

According to the pre-trial investigation, the value of the bribes may amount to at least €47,000. Officials of the STT Klaipėda Department, who carry out this pre-trial investigation covering 11 potential criminal offences, have served notices of suspicion on the Director of the Administration and two managers of private companies.

INVESTIGATION INTO POTENTIAL ABUSE OF OFFICE BY THE MAYOR OF ŠIAULIAI IN PUBLIC PROCUREMENT



It is suspected that the Mayor of Šiauliai has exerted unlawful influence on the Administration of Šiauliai City Municipality, on the director of the company owned by this municipality and on the permanent public procurement commission, in order to create privileged conditions for one private company to win a public procurement for the installation of street lighting. It is suspected that the unlawful actions may have enabled the company to win the EU-funded public procurement contract worth around €1.7 million.

The pre-trial investigation is carried out by officials of the STT Central Investigations Department and the Šiauliai Department, and the investigation is led by the European Public Prosecutor's Office. Notices of suspicion in this pre-trial investigation have been served on three persons: the Mayor of the municipality, the manager of the private company who was also a member of the public procurement commission, and a shareholder of the company that won the public procurement.

INVESTIGATION INTO POTENTIAL ABUSE OF OFFICE IN DISCLOSING PRE-TRIAL INVESTIGATION DATA



It is suspected that an investigator of the Kaunas Regional Board of the Financial Crime Investigation Service under the Ministry of the Interior of the Republic of Lithuania (hereinafter – the FCIS) has unlawfully disclosed relevant data and circumstances of an ongoing pre-trial investigation to a lawyer, who had no power of attorney conferred for these proceedings, and consult-

ed the latter how to help the participant in the case to avoid criminal liability.

Notices of suspicion have been served on two persons: the investigator of the FCIS Kaunas Regional Board and the lawyer. The pre-trial investigation is carried out by the officials of the STT Kaunas Department.

INVESTIGATION INTO POTENTIAL BRIBERY OF THE HEAD OF THE PALLIATIVE CARE AND NURSING DEPARTMENT OF THE HOSPITAL OF ROKIŠKIS DISTRICT



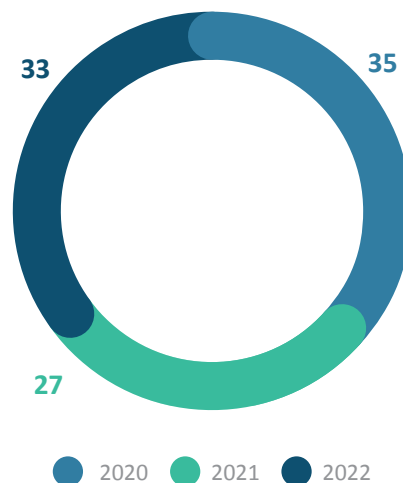
It is suspected that the head of the Palliative Care and Nursing Department of the Hospital of Rokiškis District, while providing public health services, may have accepted bribes of between €20 and €200 from 12 persons for a faster processing of documents for the provi-

sion of nursing care, proper provision of palliative care and nursing care services, and for the possibilities to attend patients in acceptable time. The pre-trial investigation is carried out by officials of the STT Panevėžys Department.

PRE-TRIAL INVESTIGATIONS COMPLETED

In 2022, the Service completed and referred to court 33 pre-trial investigation cases, i.e. 6 cases more compared to 2021.

Figure 7. **Number of pre-trial investigations referred to court**



In order to complete pre-trial investigations and to refer the criminal cases to court over the shortest possible time, the Service applied additional organisational measures to shorten the time limits of pre-trial investigations.

105 accused persons were brought to court in 2022, i.e. an increase of 8% compared to 2021.

Moreover, in 2022, as part of the pre-trial investigations were terminated, the court released 7 persons from criminal liability and held that they had committed the incriminated criminal offences.

In the cases brought to court, 179 criminal offences have been identified, of which 43 serious offences.

THE FOLLOWING PRE-TRIAL INVESTIGATION CASES COMPLETED AND REFERRED TO COURT IN 2022 ARE NOTEWORTHY

A CASE OF BRIBERY OF A JUDGE REFERRED TO COURT



Following the completion of the pre-trial investigation, the officials of the STT Kaunas Department referred to the court a criminal case where a judge of the District Court of Kaunas, Chamber of Kaunas, has been charged with bribery and three lawyers and an employee of a law firm have been charged with trading in influence and graft. According to the pre-trial investigation data, the bribery of the judge had been initiated by two lawyers who were associated with close family ties and who handed over the bribe to

the judge at his workplace through a lawyer working in Kaunas and a relative of the judge working at his law firm.

It has been identified that the bribe of at least €2,000 potentially aimed at getting the judge to impose a lighter administrative measure and to reduce the period of deprivation of a driving licence from 12 to 3 months when hearing an administrative offence case of one individual under the appeal procedure.

COURT TO HEAR A CASE OF ATTEMPTED BRIBERY OF THE MAYOR OF NERINGA



Following the completion by officials of the STT Klaipėda Department of the pre-trial investigation, which was initiated when the Mayor of Neringa reported the bribe he had been offered, the criminal case has been referred to court. In this case, a businessman has been accused of attempting to bribe the Mayor of Neringa and the director of UAB Neringos vanduo. According to the pre-trial investigation data, the accused businessman sought offering bribes to obtain a settlement between the tenderer, who had been declared the winner of the auction for the sale of the immovable property – the sewage

pumping station that was out of order – and the organisers of the auction: UAB Neringos vanduo, the Administration of Neringa Municipality, who contested the decision at the court of appeal instance, and the unsuccessful tenderer.

The accused offered a bribe of at least €10,000 to the Mayor of Neringa Municipality. When the Mayor of Neringa refused to accept the bribe offered, the accused, who sought a settlement agreement, gave a bribe of €10,000 to the director of UAB Neringos vanduo, who cooperated with law enforcement.

THE CASE CONCERNING TRADING IN INFLUENCE BY ATTORNEYS AT LAW REFERRED TO COURT



Following the completion of the pre-trial investigation, the officials of the STT Kaunas Department have referred to the court a criminal case where charges for trading in influence have been filed against 8 persons, 2 of whom are attorneys at law practising in Kaunas. The accused persons sought to influence the prosecutors and judges to act unlawfully in the pre-trial investigations in their control or the cases heard by them and to take the procedural decisions they wanted. The investigation identified that one of the accused attorneys at law agreed to accept and accepted bribes of more than €40,000 from the other accused persons in return for a promise to in-

fluence several prosecutors and judges who worked in Kaunas, acting together with an employee of his law firm and taking advantage of their acquaintances or other probable influence on public officials.

The other attorney at law is accused in this case of taking a bribe of €4,000 from the accused for the promise to take advantage of his acquaintances or other influence on a public servant to influence the prosecutor of the Kaunas Regional Prosecutor's Office in the pre-trial investigation under his control and milder criminal liability will be proposed.

THE COURT WILL HEAR A CASE CONCERNING BRIBERY, GRAFT AND ABUSE OF OFFICE IN BIRŽAI DISTRICT MUNICIPALITY



Following the completion of the pre-trial investigation, the officials of the STT Panevėžys Department have referred to the court a criminal case where charges for potentially committed corruption-related offences have been filed against five persons: the Mayor of Biržai District Municipality, the Director of the Administration of the same municipality, and a member of the Council who is former member of the Seimas and was the deputy elder of one of the elderships of Biržai District Municipality. According to the case-file data, the Mayor and the former Director of the Municipality Administration, acting in a group of accomplices, may have illegally sought the dismissal of the director of a public institution established by the Municipality and the appointment of another person to this position. The former member of the Council of Biržai District Municipality is accused of

graft for seeking the dismissal of the director of the public institution and the appointment of his fellow party member in return for voting favourable for the ruling coalition at Council meetings.

The then Director of the Administration of Biržai District Municipality, together with the former member of the Seimas, may have acted illegally in order to have a specific person appointed to the position of district elder or deputy elder of one of the elderships. In this case, the charges for aiding and abetting in the abuse of office have been filed against a candidate for the post of civil servant. The former member of the Seimas has been charged for seeking to help his acquaintance to obtain a job in the municipality by potentially initiating the abuse of office by the then Director of the Municipality Administration.

THE COURT WILL HEAR A CASE OF FICTITIOUS EMPLOYMENT IN MOLĖTAI HOSPITAL



Following the completion of the pre-trial investigation by the officials of the STT Panevėžys Department, a criminal case concerning the potentially fictitious employment of persons in Molėtai Hospital has been referred to court. The charges for the abuse of office, falsification of documents and embezzlement of property have been filed against the Director of Molėtai Hospital and 10 persons, while 4 other persons have been released from criminal liability on bail. According to the pre-trial investigation data, a consolidated inspection by the responsible institution in 2019 revealed violations of legal acts regulating the provision of healthcare services in Molėtai Hospital

in relation to the accessibility and quality of healthcare services and the lack of relevant specialists.

It is suspected that, in order to avoid the risk of sanctions as a result of the violations detected during the consolidated inspection, fictitious employment contracts with 11 medical specialists of various fields had been concluded in Molėtai Hospital and fictitious working hours had been set for one of the employees of this institution. Almost €10,400 has been spent for the fictitious employment relationships of the above-referred medical specialists.

A CASE CONCERNING FRAUDULENTLY ACQUIRED FUNDS REFERRED TO COURT



Following the completion of the pre-trial investigation initiated by the STT Complaints Division, the officials of the STT Šiauliai Department have referred to court a criminal case where a company and its former production director are accused of fraudulently acquiring large-value property of another person for their own benefit by falsifying and using official documents. The former Deputy Director of the Šiauliai Region Waste Management Centre (ŠRWMC) has also been prosecuted on charges of improper performance of official duties. According to the pre-trial investigation data, between November 2018 and September 2020, the former production director of the company allegedly gave unlawful instructions to his subordinate employees to mix at least 4,000 tonnes of waste, which should have been disposed of by incineration, into technical compost and, together with the compost, to deliver the waste

free of charge to the landfill of non-hazardous waste of Šiauliai region. The company falsified service reconciliation certificates and issued VAT invoices to the ŠRWMC for the waste management services that had not been actually performed or had not been performed properly and, in this way, the production director potentially acquired, for the benefit of the company, the assets belonging to the ŠRWMC the value whereof was high, not less than € 124,000.

The State has not received over € 40,000 of environmental pollution fees for the waste disposed in the landfill. The deputy director of ŠRWMC is accused of failing to ensure the supervision and control over the company's activities and of allowing the employees to derogate from the requirements of the waste reception procedure.



COURT WILL HEAR A HOSPITAL BRIBERY CASE

Following the completion of the pre-trial investigation by the officials of the STT Šiauliai Department, a criminal case has been referred to the court regarding corruption and other criminal acts potentially committed by the general manager of Šiauliai Hospital and other persons. The charges have been filed against the general manager of the Hospital for accepting a bribe of at least €23,000 for the smooth signing of contracts and the performance of works with the company that had won the public procurement procedures for the supply, maintenance and repair services of medical equipment for twenty three times. The general manager is also accused of embezzlement of the property worth €12,000 by illegally acquiring goods from the hospital's funds, which he handed over to his family members, as well as for appropriation of the property worth €9,000 – the majority was used as salary top-ups for subordinate employees who received unlawful instructions to return the funds to the latter.

He is also accused of agreeing to accept a bribe of €15,000 from the company that was to win the procurement procedure and of agreeing to accept the bribe for the benefit of another person, i.e., it is suspected that the general manager had promised to influence the subordinate doctors of the hospital so that they, after prescribing reimbursable medications for patients, would refer them specifically to the pharmacies or stores of a particular company.

In this case, charges for aiding and abetting in the embezzlement and appropriation of the hospital's assets, abuse of office, falsification of documents and graft have been filed against 7 other persons, including former employees of the hospital and representatives of the companies that participated in the public procurement procedures. During the pre-trial investigation, 6 persons were released from criminal liability on bail.

A CASE CONCERNING ENVIRONMENTAL DAMAGE OF MORE THAN €5.6 MILLION REFERRED TO COURT



The STT Klaipėda Department has completed the pre-trial investigation of abuse of office, violation of environmental protection rules and destruction of protected areas. According to the pre-trial investigation data, during the implementation of the reconstruction of a street part in Neringa, financed with the funds of the State and the Administration of Neringa Municipality, almost 2,000 tonnes of construction waste generated during the reconstruction were illegally dumped and spread over in the areas protected by the State.

According to the assessment of environmental experts, these actions have caused damage to the Curonian Spit National Park, the Parnidis and Alksnynė Landscape Reserves and to the ancient settlement of Nida – the material damage caused to nature potentially exceeds EUR EUR 5.6 million. Charges have been brought against the manager and deputy manager of the road construction company, as well as against the legal entity.

COURT JUDGMENTS

In 2022, 69 criminal cases where pre-trial investigations were carried out by STT officials were disposed of by the courts. Persons were found guilty in 59 criminal cases (or 86% of all the cases heard), the same as in 2021. In 2021, 74 persons were held guilty, of whom 70 were convicted and 4 released from criminal liability by the court.

Fines were imposed on 58 convicted persons (or 83%), 9 convicted persons (or 13%) were sentenced to imprisonment with suspended sentence, 2 were fined and sentenced to imprisonment with suspended sentence or were ordered to serve the sentence in a correctional

home, 1 convicted person was sentenced to imprisonment and ordered to serve the sentence in a correctional home after the sentence consolidation rules had been applied, i.e. the sentence was consolidated with the custodial sentence imposed earlier by the court.

THE FOLLOWING JUDGMENTS RENDERED BY COURTS IN 2022 IN THE CASES WHERE PRE-TRIAL INVESTIGATIONS WERE CARRIED OUT BY THE STT ARE NOTEWORTHY

A HOSPITAL DIRECTOR FOUND GUILTY OF BRIBERY

The District Court of Vilnius City found the former head of the Clinical Hospital of Vilnius City guilty of bribery. This case was disjoined from the pre-trial investigation carried out by the STT concerning the suspected bribery of seven other doctors at the Clinical Hospital of Vilnius City. The head of the hospital was charged for 13 episodes of criminal offences, during which he demanded and accepted bribes from patients for his own benefit between September and December 2021 in return for lawful actions in the exercise of his powers – for the performance of operations. According to the pre-trial investigation data, the bribes were most

often demanded and accepted in the amount from €100 to €300.

The court credited the time spent by the convicted person in provisional detention into the fine and imposed a final fine of €47,900, which the convicted person will have to pay within two years. €1,900 obtained from the criminal offence will also be confiscated from the convicted person. Such punishment for the convicted person was requested by the prosecutor who led the pre-trial investigation and requested the court to conclude the proceedings with a penal order.





A MEMBER OF THE SEIMAS CONVICTED OF ABUSE OF OFFICE

The Court of Appeal of Lithuania has heard an appeal of a member of the Seimas of the Republic of Lithuania against the judgment of conviction rendered by the Vilnius Regional Court. The member of the Seimas of the Republic of Lithuania had been accused of receiving material benefits from a private company in the form of company funds, fuel cards and flight tickets in exchange of his illegal actions in the interests of this company and for illegal interference into activities of other civil servants in Lithuania and in the Russian Federation

by requesting to act unlawfully in the interests of this company so that it were not forbidden to export the company's production to Russia and Belarus.

The Court of Appeal has upheld the judgment of conviction of the court of first instance in the proceedings where this member of the Seimas of the Republic of Lithuania had been sentenced for the abuse of power. A fine of €15,064 has been imposed and €3,308 obtained from the criminal offence have been confiscated.

JUDGMENT OF CONVICTION FOR CORRUPTION IN THE FISHERIES SERVICE



The Vilnius Regional Court has heard a criminal case concerning the fictitious employment of persons in the Fisheries Service under the Ministry of Agriculture of the Republic of Lithuania (hereafter – the Fisheries Service) and found 6 persons guilty of abuse of office, misappropriation of another person's property, falsification of documents, and possession of falsified documents. The pre-trial investigation revealed that two persons were fictitiously employed in the Fisheries Service in 2014-2017. These persons gave their salaries to the then Director of the Fisheries Service, his deputy, and two other unit heads. The latter, knowing that the persons did not perform any work functions in the Fisheries Service, forged documents for their transfer to other positions, allocated salary supplements and other allowances, which were later taken back from the

fictitiously employed persons. The court has sentenced the former Deputy Director of the Fisheries Service to 5 years of imprisonment and suspended it for 3 years, the former Director of the Fisheries Service to 3 years and 9 months of imprisonment and suspended its service for 2 years and 10 months for abuse of office, the misappropriation of another person's property, the forgery of documents and the possession of forged documents.

Other convicted persons, including the fictitiously employed persons, have been sentenced by the court to imprisonment from 2 years to 3 years and 6 months with suspended sentence execution. The convicted persons will also have to jointly and severally compensate for the material damage of €27,000 suffered by the Fisheries Service.

FINAL JUDGEMENT IN THE CASE CONCERNING AN ATTEMPT TO BRIBE OFFICIALS OF THE FINANCIAL CRIME INVESTIGATION SERVICE



The Supreme Court of Lithuania has rendered a final judgment in the case investigated by the STT regarding an attempt to bribe officials of the Financial Crime Investigation Service under the Ministry of the Interior of the Republic of Lithuania (hereinafter – the FCIS). The head of a company has been convicted for offering part of the cash amount, i.e. €1,030 that had been found during the

search of the place of his residence as a bribe to the officers of the FCIS who carried out the search in order to avoid the seizure of this amount.

The decision of the court of appeal instance whereby a fine of €10,000 has been imposed on the person who attempted to bribe the officials of the FCIS has been upheld.

THE DIRECTOR OF A STATE-OWNED ENTERPRISE AND TWO BANKRUPTCY ADMINISTRATORS FOUND GUILTY OF ABUSE OF OFFICE



The Vilnius Regional Court found the former director of a state-owned enterprise guilty of abuse of office and embezzlement of high-value property of another person and two bankruptcy administrators – of abuse of office and misappropriation of assets. The pre-trial investigation revealed that the state-owned company had purchased real estate with the right to lease the state-owned land plot for the price 4.3 times higher than the real value of the property.

In this way, the then head of the company deliberately acted contrary to the interests of the enterprise and the State in abuse of his office and, as a result, the State of Lithuania has suffered significant non-pecuniary and pecuniary damage of €101,000. The pre-trial investigation revealed that the real estate acquired by the state-owned enterprise at an unreasonably high price was related to two bankruptcy administrators who had the right to organise the sale of assets of one bankrupt company. The

case-file data show that, under a pre-agreed scheme, the bankruptcy administrators had sold the real estate of the bankrupt company, i.e. buildings with the right to lease a state-owned land plot, without an auction, through a number of persons associated by kinship and consanguinity relations, and were able to misappropriate the money they received from this property, thereby causing considerable non-pecuniary damage to the interests of the State and the pecuniary damage of almost €57,000 to the creditors of the bankrupt enterprise.

AN EMPLOYEE OF THE STATE FOREST SERVICE FOUND GUILTY OF BRIBERY

The Vilnius Regional Court has found a chief specialist of the Forestry Supervision Division of the State Forest Service guilty of bribery. The court ascertained that the accused had demanded a bribe of €10,000 from a forest owner for unlawful acts in the exercise of his authority, in return for the issuance of a forest felling permit, instead of drawing up a

The court has sentenced the former head of the state-owned enterprise to 3 years of imprisonment with its service suspended for two years, sentenced the bankruptcy administrators to imprisonment from 2 to 4 years with its service suspended for two years, and confiscated more than €14,000 of the proceeds of crime from each of them. As the civil claims have been satisfied, the bankruptcy administrators have been jointly and severally ordered to pay €42,158.



deed of unauthorised felling because the forest had already been felled.

The Vilnius Regional Court has imposed a fine of €22,500 on the chief specialist of the State Forest Service and deprived him of the right to work in the civil service for 3 years.

JUDGMENT OF CONVICTION FOR THE DIRECTOR OF A MUNICIPALITY-OWNED ENTERPRISE

The Panevėžys Regional Court has rendered a judgment of conviction whereby the former director of the municipality-owned enterprise UAB Utenos regiono atlieky tvarkymo centras (URATC) has been held guilty of bribery, abuse of office and falsification of documents. The pre-trial investigation identified that the director of URATC, by giving unlawful instructions to his subordinates and in violation of the procedure laid down by the legal acts, had gratuitously used the assets and other resources of the company under his management, as well as accepted bribes from the managers of one of the enterprises in Kaunas region. The investigation also found that a construction company had carried out various works in the house under construction that belonged to the director, bought and used various building materials, which had been paid in cash without being accounted and had been misappropriated in this way – the loss caused to the company was €38,000 and around

€10,000 in taxes have not been paid to the State. The court has imposed a fine of €25,760 on the director of the enterprise and confiscated €2,906, as well as deprived him of the right to work in managerial positions in the state, public or private sector for 3 years. The construction company has been fined €18,830 for falsifying documents and fraudulent accounting, the director of this enterprise has been fined €7,532 and sentenced to 3 years of imprisonment – after the sentence became enforceable, he was ordered to serve 6 months of real imprisonment immediately, the service of the remaining sentence part has been suspended by 2 years and 6 months subject to intensive supervision and a confiscation of €20,000.

A fine of €3,700 has been imposed on the shareholder of the company for the falsification of documents. Almost €80,000 have been awarded from the convicted persons to the State budget.



AN ATTORNEY AT LAW FOUND GUILTY OF TRADING IN INFLUENCE

The Panevėžys Regional Court found an attorney at law guilty of trading in influence. According to the case-file data, the convicted person agreed with another attorney at law in 2018 that the latter would influence a judge of the Court of Appeal of Lithuania, who would quash the judgment of the court of first instance when hearing the appeals of the persons defended by the convicted attorney at law for an unlawful remuneration and would acquit the accused persons. For this

purpose, the convicted attorney at law contacted another attorney at law and agreed that the latter would influence the judge in question for a bribe of €22,000. The court has found the attorney at law guilty and imposed a fine of €40,000.

The case has been disjoined from an extensive pre-trial investigation of potential large-scale corruption of judges, lawyers and other persons.



TRACING AND RECOVERY OF ASSETS

The STT investigations of corruption-related and other criminal offences related to the material benefit derived from crime focus not only on the detection of criminal offences, the identification of persons who facilitate, commit or have committed such offences, but also on the tracing of assets involved in the commission of criminal offences and their return to the State. The aim is twofold: not only to punish the perpetrators, but also to deprive them of the possibility of deriving material benefit from the offence (make economic impact).

In 2022, the STT opened pre-trial investigations into 3 criminal offences of illicit enrichment (Article 189¹ of the CC) and 5 criminal offences of money laundering (Article 216 of the CC). In total, the STT carried out pre-trial investigations concerning 12 offences of illicit enrichment (Article 189¹ of the CC) and 7 offences of money laundering (Article 216 of the CC) in 2022.

1 pre-trial investigation of illicit enrichment (Article 189¹ of the CC) was referred to court in 2022.

The damage identified in the pre-trial investigations carried out by the STT in 2022 was more than €4.8 million. The amount of damage identified in the criminal cases heard by courts in 2022 where pre-trial investigation was carried out by the STT amounts to almost €67 million.

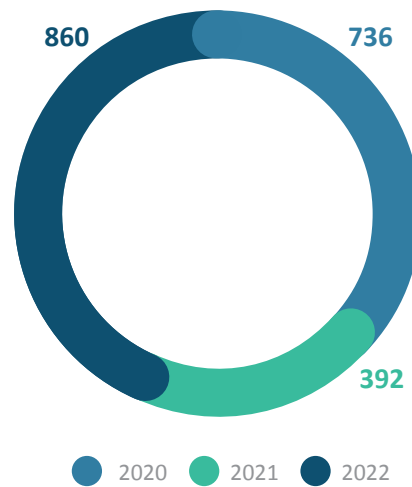
For securing civil claims, potential confiscation of assets or extended confiscation of assets, temporary restriction of property rights was applied in relation to the

assets worth almost €13 million in the pre-trial investigations carried out by the STT in 2022. The temporary restriction of property rights applied to assets in the cases heard by courts in 2022 where the pre-trial investigations were carried out by the STT amounted to more than €6 million.

In 2022, civil claims in the amount of €442,000 were brought in the pre-trial investigations carried out by the STT. According to available data, the civil claims brought in the criminal cases pending before the courts in 2022 where pre-trial investigations were carried out by the STT amount to more than €10 million in total.

In 2022, after hearing the criminal cases where pre-trial investigations were carried out by the STT, the courts imposed fines on individuals amounting to more than €860,000, of which €727,000 on natural persons and €133,000 on legal entities, i.e. more than twice as much as in 2021, when the amount of fines was €392,000.

Figure 8. Fines, EUR thousand



In 2022, in the cases the STT carried out pre-trial investigations, courts decided to confiscate almost €84,000.

In 2022, the defendants were ordered by courts to compensate for the damages of around €72,000 and to pay almost €6,000 to the Fund of Crime Victims.

In 2022, the officials of the Service carried out an analysis regarding the assets of 163 persons who met the conditions of the Law on the Civil Confiscation of Assets. In one case, a prosecutor decided to initiate an

investigation of assets after gathering information suggesting that the person had assets that had not been legally acquired.

Asset tracing will be a priority in 2023 in order to return to the State what has been illegally acquired through corruption-related criminal offences. To increase the effectiveness of activities of this direction, international and inter-institutional cooperation will be strengthened within the State and the competence of officials investigating and tracing illegally acquired assets will be increased.



PREVENTION OF CORRUPTION AND ANALYTICAL ANTI-CORRUPTION INTELLIGENCE

Prevention of corruption and analytical anti-corruption intelligence aim at transparency of legal regulation and administrative procedures in the State. Effective corruption prevention and analytical anti-corruption intelligence create the pre-conditions for faster identification of threats and elimination of risks before they escalate into corruption-related criminal acts.

IMPLEMENTATION OF THE LAW ON PREVENTION OF CORRUPTION













On 1 January 2022, a recast Law on Prevention of Corruption entered into force, amending the corruption prevention model that has been in place for almost 20 years.

In order to strengthen the resilience of public and private sector entities to corruption, to ensure proper and effective implementation of the provisions of the Law on Prevention of Corruption and effective identification of corruption risk factors, the Service organised 11 methodological assistance events attended by 1,664 persons from various public sector institutions and bodies, provided consultations and recommendations, updated the Recommendations on the Determination of the Probability of Manifestation of Corruption and its Procedure along with a model list of typical risks and their factors specific to individual areas of activity³⁵, prepared good practice examples for assessing the criteria of the certificate on anti-corruption assessment of draft legislation³⁶, and updated the Guidelines for Creating an Anti-Corruption Environment for Business in consultation with the Ministry of Economy and Innovation of the Republic of Lithuania, the Ministry of Foreign Affairs of the Republic of Lithuania, Clear Wave, the Lithuanian Chapter of Transparency International and the general public.

The successful implementation of the provisions of the recast Law on Prevention of Corruption is reflected in the increasing number of reports received by the Service in accordance with the obligation of public sector employees under the Law on Prevention of Corruption to report cases of potential corruption of which they are aware. In 2022, 97 reports were made by persons according to their duty to report, which is 45% more than in 2021 when 67 reports were received. The reports made by persons who complied with their obligation to report accounted for 2% of all reports received by the Service in 2022 and 1.5% in 2021.

Given that the new corruption prevention model is based on the principle of subsidiarity, the Service analysed in 2022 how municipalities, ministries and other autonomous bodies were doing in creating an anti-corruption environment by applying the mandatory measures set out in the Law on Prevention of Corruption.













Creation of an anti-corruption environment and implementation the Law on Prevention of Corruption in municipalities

Positive developments	Positive developments	Shortcomings
 35% assessment of corruption risk management carried out	 92% persons responsible for creating an anti-corruption environment appointed	 36% not a core function
 100% efforts to ensure the reliability of staff	 88% anti-corruption standards of conduct implemented	 23% no description of potential corruption risk examples and the actions to be taken by staff in the event of such risks
 100% trainings for employees on the issues of creating an anti-corruption environment held at least once a year	 93% internal whistleblowing channel implemented	 7% information received through the internal whistleblowing channel
 100% anti-corruption assessment of draft legal acts undertaken	 75% the list of positions for which declarations of private interests are required approved	 17% no control and monitoring of the declarations and interest reconciliation practices













³⁵ Source: <https://www.e-tar.lt/portal/lt/legalAct/6132e04051d911ec862fdc8b3e3e05>

³⁶ Source: <https://www.stt.lt/mokomoji-ir-metodine-medziaga/metodine-pagalba/teises-aktu-ar-ju-projektu-antikorupcinis-vertinimas/7622>

Creation of an anti-corruption environment and implementation the Law on Prevention of Corruption in ministries

Positive developments	Positive developments	Shortcomings
 assessment of corruption risk management carried out	 persons responsible for creating an anti-corruption environment appointed	 not a core function
 internal whistleblowing channel implemented	 anti-corruption standards of conduct implemented	 no description of potential corruption risk examples and the actions to be taken by staff in the event of such risks
 trainings for employees on the issues of creating an anti-corruption environment held at least once a year	 anti-corruption assessment of draft legal acts undertaken	 not all necessary draft legislation is assessed
 efforts to ensure the reliability of staff	 the list of positions for which declarations of private interests are required approved	 no procedure for the registration and assessment of gifts

Creation of an anti-corruption environment and implementation the Law on Prevention of Corruption in autonomous institutions, except ministries

Positive developments	Positive developments	Shortcomings
 assessment of corruption risk management carried out	 persons responsible for creating an anti-corruption environment appointed	 not a core function
 internal whistleblowing channel implemented	 anti-corruption standards of conduct implemented	 no description of potential corruption risk examples and the actions to be taken by staff in the event of such risks
 trainings for employees on the issues of creating an anti-corruption environment held at least once a year	 anti-corruption assessment of draft legal acts undertaken	 anti-corruption assessment certificates not published
 efforts to ensure the reliability of staff	 the list of positions for which declarations of private interests are required approved	 no procedure for the registration and assessment of gifts

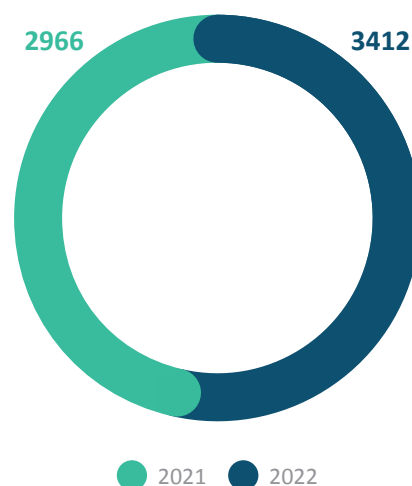
PROVISION OF INFORMATION ON PERSONS

In implementing the measure laid down in the Law on Prevention of Corruption for creating an environment resilient to corruption – the ensuring of staff reliability, the Service gathers and provides information about the person seeking or holding a position in the public sector entity to the heads public sector entities who are appointing, nominating or have appointed such a person.

This information is provided in order to assist the head of the public sector entity to make reasoned and motivated decisions on the appointment of persons to positions, determine the areas of responsibility, refuse to appoint to a position, dismiss from position or take other decisions related to the staffing of the public sector entity.

In 2022, the Service provided information about 3,412 persons under the Law on Prevention of Corruption, which is 15% more than in 2021.

Figure 9. **Number of persons on whom information was provided**



IDENTIFYING THREATS AND RISKS OF CORRUPTION

The Service identified corruption risks while performing its various activities. Both officials who carry out criminal prosecution and investigate complaints can come across situations that are flawed from the perspective of anti-corruption or identify risks of corruption. In such cases, information about potential corruption risks is transferred to corruption prevention or analytical anti-corruption intelligence officials for thorough assessment.

In order to identify systemic corruption risks and factors that are most damaging for the State in a particular field of activity of the State or a municipality, or in a process involving the activity areas of one or more public sector entities, the officials of the Service carry out corruption risk analyses, anti-corruption assessments of legal acts, and analytical anti-corruption intelligence reviews.

The purpose of corruption risk analysis, one of the corruption prevention measures, is to assess, from an anti-corruption perspective, an area of activities of the State or a municipality or a process covering activities of one or several public sector entities in order to identify the corruption risk factors that can create pre-conditions for employees or other persons to commit corruption-related violations and to make proposals in the form of recommendations for the reduction of the identified risk of corruption and/or for elimination of

the corruption risk factors, as well as for the improvement of transparency in the activity area or process of the State or municipality, as well as in the activities of public sector entity.

Another corruption prevention measure – the anti-corruption assessment of legislation or draft legislation – helps to build systemic resilience to corruption in the State as it most often prevents corruption risk factors at the initial stage of drafting and, in case a legal act which has already been adopted is assessed, enables to identify the existing risks of corruption.

Following the assessment of corruption risk factors by the officials of the Service, responsible authorities are provided not only with information about the corruption risk factors identified, but also with proposals which, if implemented, create the pre-conditions for eliminating or managing corruption risks.

In 2022, officials of corruption prevention prepared:

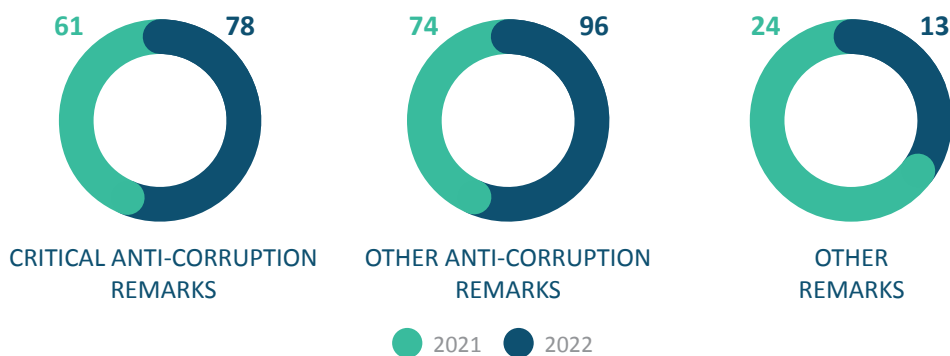
- 16 conclusions concerning corruption risk analyses, containing 187 remarks and 436 proposals for improvement in the areas examined. In 2021, the conclusions concerning corruption risk analyses contained 159 remarks and 387 proposals.
- 79 anti-corruption assessment conclusions with 543 remarks and proposals concerning the improvement of provisions of legal acts or draft legal acts regulating different areas. In 2021, 577 remarks and proposals were made.

With priority attributed to the identification of corruption risk factors that can be most damaging to the State, the remarks submitted as of 1 January 2021 are grouped into critical anti-corruption remarks, other anti-corruption remarks and other remarks according to their significance. Critical anti-corruption remarks are made concerning the corruption risk factors that are the most threatening and damaging to the State.

In 2022, conclusions concerning corruption risk analyses contained 78 critical anti-corruption remarks, an increase by 17 critical anti-corruption remarks or 22% compared to 2021. The share of critical anti-cor-

ruption remarks in the total number of all remarks made in the conclusions of corruption risk analyses increased by almost 4%: from 38.4% in 2021 to 42% in 2022.

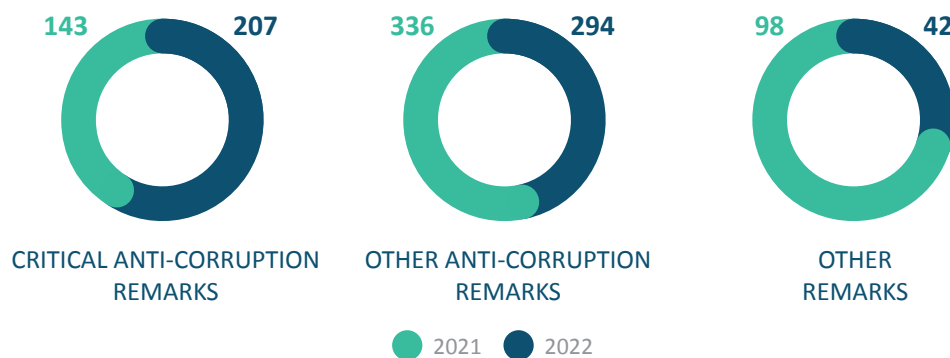
Figure 10. **Remarks in the conclusions on corruption risk analyses**



In 2022, 207 critical anti-corruption remarks were made in the anti-corruption assessment conclusions, that is, an increase by 64 critical anti-corruption remarks or 45% compared to in 2021.

The share of critical anti-corruption remarks in the total number of all remarks made anti-corruption assessment conclusions increased by 13.2%: from 24.8% in 2021 to 38% in 2022.

Figure 11. **Remarks made in anti-corruption assessment conclusions**



The implementation of the proposals made in corruption risk analyses and anti-corruption assessments, such as amendments to a law or the development of a new procedure, often take longer than planned, therefore, officials of the Service monitored the implementation of the proposals made in previous years during 2022.

According to the data of the monitoring carried out in 2022 on the implementation of proposals, 88% of the proposals made in the conclusions concerning corruption risk

analyses and 51% of the proposals made in anti-corruption assessment conclusions have been implemented, are being implemented or have been partially implemented.

Figure 12. Implementation of the proposals made in conclusions concerning corruption risk analyses

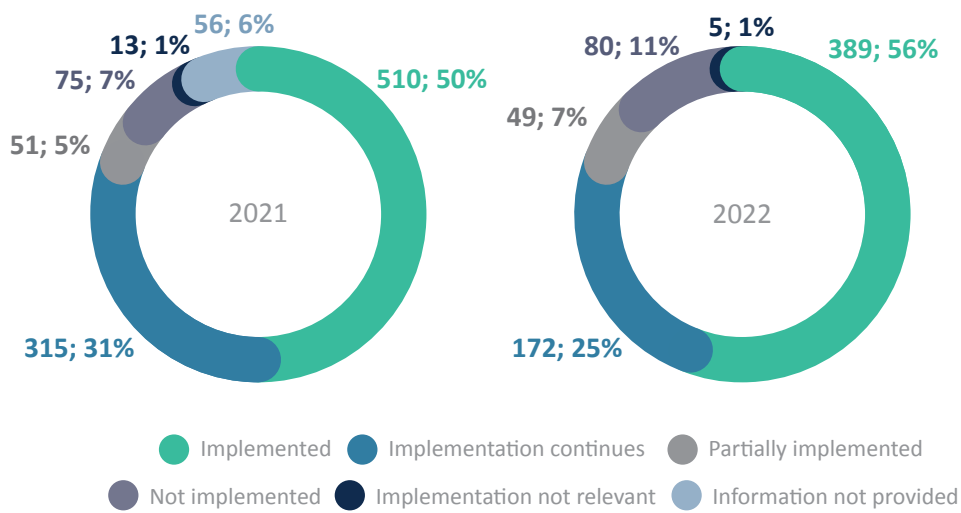
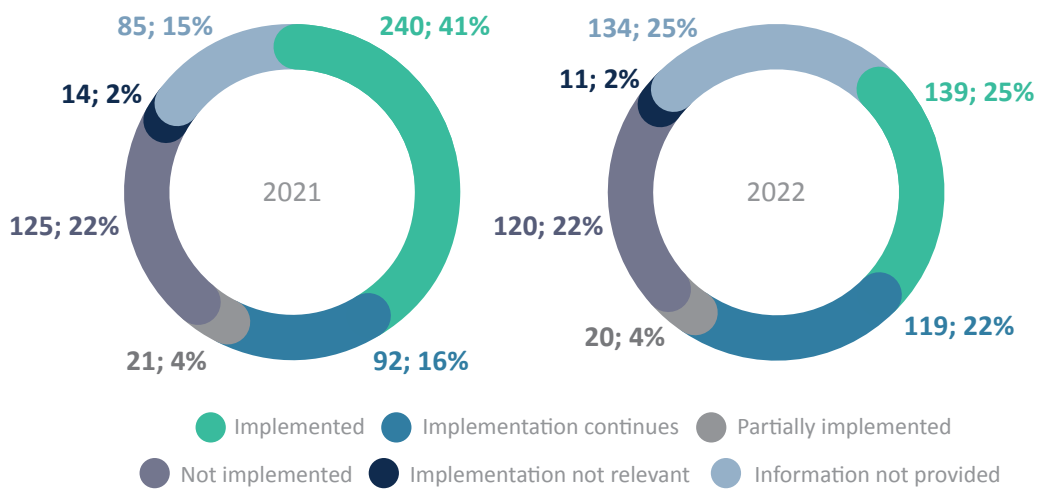


Figure 13. Implementation of the proposals made in anti-corruption assessment conclusions



85% of the proposals concerning critical anti-corruption remarks made in the conclusions on corruption risk analyses and 54% of the proposals made in anti-corruption assessment conclusions have been fully or partly implemented or were being implemented over 2022.

14 pav. **Figure 14. Implementation of the proposals concerning critical anti-corruption remarks made in conclusions on corruption risk analyses**

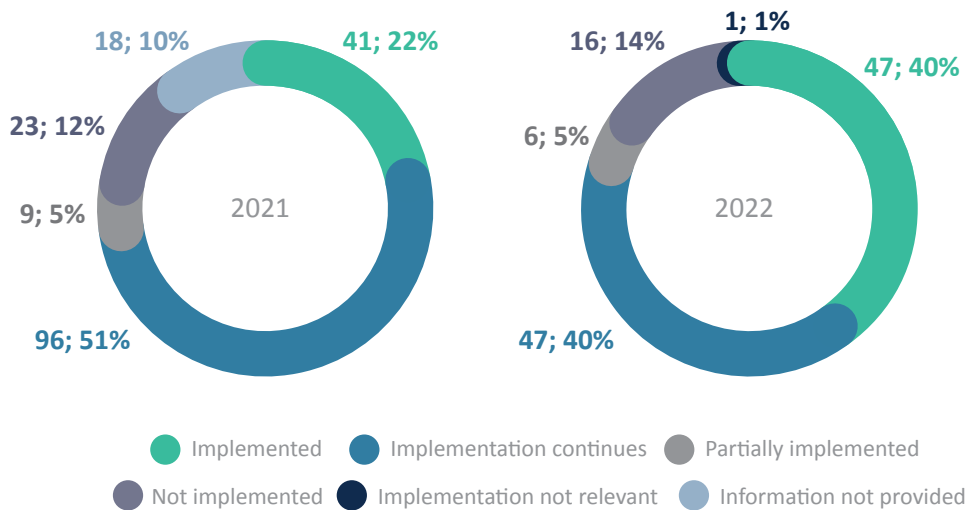
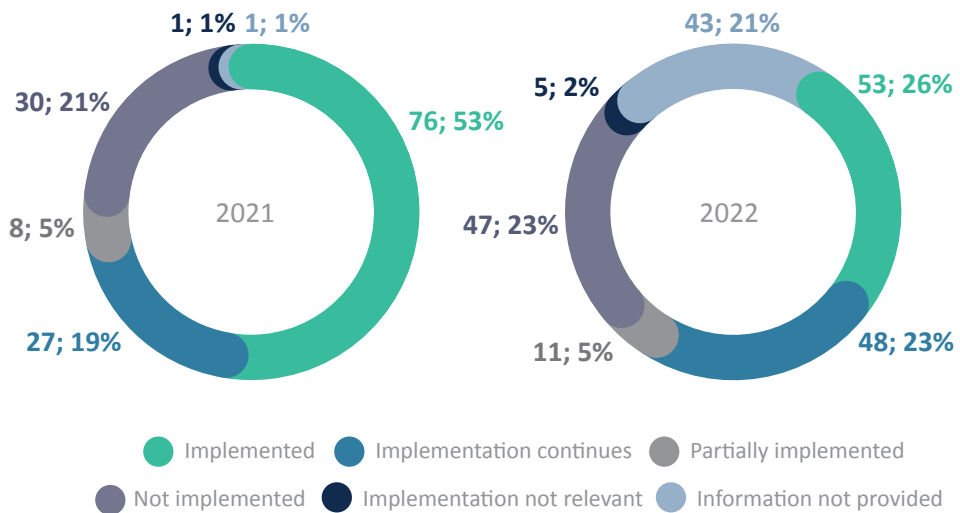


Figure 15. **Implementation of the proposals concerning critical anti-corruption remarks made in anti-corruption assessment conclusions**



SYSTEMATIC APPLICATION OF CORRUPTION PREVENTION MEASURES AND ANALYTICAL ANTI-CORRUPTION INTELLIGENCE TOOLS

In order to increase the effectiveness of corruption prevention and analytical anti-corruption intelligence measures, the Service has started to implement these measures systematically since 2021, prioritising those areas where the greatest corruption threats have been identified.

The officials of analytical anti-corruption intelligence analyse data in state registers and information systems, carry out reviews and/or checks and identify the areas of State activities where corruption risks are probable. In the identified areas of State activities, corruption prevention officials carry out corruption risk analyses and/or anti-corruption assessments

of legislation. In order to provide a comprehensive anti-corruption assessment of problematic issues in particular areas all over the country, some of the corruption risk analyses undertaken are continuous, i.e. consisting of 3 to 5 assessments of the same area of the institutions and bodies functioning in different regions.

THE FOLLOWING CORRUPTION RISKS IDENTIFIED IN 2022 ARE NOTEWORTHY



PUBLIC PROCUREMENT

On the basis of an analytical anti-corruption intelligence review, corruption prevention officials have carried out continuous analyses of corruption risk in the public procurement procedures of single supplier. A total of 5 corruption risk analyses have been carried out³⁷.

The corruption risk analyses focused on the public procurements by healthcare institutions (hereinafter – PHCIs), because the analytical anti-corruption intelligence review revealed that PHCIs are characterised by a high number of single-supplier procurements. It was found that the PHCIs analysed carried out superficial market research procedures, did not determine real procurement values, and technical specifications were prepared according to data of particular procurement objects, which did not ensure adequate competition between potential suppliers. The corruption risk analyses revealed weaknesses in the man-

agement of conflicts of interest, as the procurement managers of the PHCIs analysed had been involved in decisions concerning the suppliers in the companies of which persons close to them worked. Moreover, procurement managers of the PHCIs, in their capacity as members of public organisations of the health sector, had taken part in making decisions in the procurement procedures where sponsors of the public organisations participated. The practice applied in the PHCIs analysed to carry out procurement procedures without publication in unforeseen circumstances requiring urgent procurement, although the Law on Public Procurement provided for the possibility of accelerated procurement procedures with publication, has been assessed as defective from anti-corruption perspective. Under the current legal provisions, extreme urgency is justified and negotiated procurement procedures without prior publication are allowed, however,

³⁷ Source:

<https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1035>
<https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1048>
<https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1051>
<https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1054>
<https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1053>

only for the procurement of works, goods or services that are strictly necessary to respond immediately to unforeseen events. Meanwhile, the analyses undertaken have shown that contracts awarded by means of negotiated procedures without prior publication had been in force longer and had the scope larger than necessary to respond to such unforeseen events.

SPATIAL PLANNING AND CONSTRUCTION

In the context of a large-scale pre-trial investigation carried out by the criminal prosecution officials of the Service concerning the suspected corruption in the areas of spatial planning and state supervision of construction, the corruption prevention officials carried out continuous corruption risk analyses (4 corruption risk analyses³⁸) in the areas of issuance of building permits and the process of building completion by drawing up a construction completion certificate. A large number of legal acts and draft legal acts regulating this area have also been assessed from anti-corruption perspective.

The analysis of the processes for issuing building permits revealed that the legal regulation in force at the time of the corruption risk analyses made it possible to choose a building reconstruction instead of a new construction, thus circumventing the legal requirements laid down in legal acts for new construction or for construction in the areas where new construction is not allowed. In the light of the issues identified, attention was paid to anti-corruption assessments of the draft Law on Amendments to the Law on Construction.

The corruption risk analyses have identified gaps in the legal regulation and practical application, which created conditions for getting building permits by designing and constructing buildings actually designated for residential and/or recreational purposes, but by indicating that their purpose was administrative or ancillary household buildings. For example, the protection requirements of national and regional parks prohibit the construction of more than one residential house on a single plot, however, in practice this prohibition was circumvented by designing and building non-residential ancillary household buildings, which were subject to simpler technical requirements for obtaining a building permit, the requirements for the completion and legalisation of the structure, or the possibility to change easily the designation of the structure. In the construction completion procedures, attention has been drawn to the practice of building completion in stages, which is not in line with the provisions of the Law on Construction – building completion is divided into phases if it has not been completed or if it is believed that it will not be completed at once to its full extent. It

Cases have been identified where oral contracts had been awarded in procurements carried out under the quotation procedure without prior publication, which allows for artificial fragmentation of public procurement by awarding contracts to the same entities even on the same day, for similar goods, in order to avoid separate public procurement procedures.



was also found that the competences of members of the building completion commission had not been clearly defined, the inspection scope of the structure had not been defined, and there had been no approved and used questionnaires for carrying out the construction completion procedure, therefore, transparency and certainty had not been ensured. It should be noted that not everything had been recorded from the time a member of the construction completion commission arrived at the site until the end of activities of this commission, as some of the actions taken by commission members had not been reflected in the internal documents of the institutions, nor had any photographs or video recordings been taken, and that had not been noted in the construction information system Infostatyba. It is at this point that there is a risk of corruption and unlawful agreements. Deficiencies in the construction information system Infostatyba, which could have a negative impact on transparency, have also been identified in the anti-corruption assessments of legal acts and their drafts. It was noted that the system did not automatically generate a list of entities that had to approve the project of a building depending on the construction type or building category and the legal acts analysed did not detail the reasons for which a construction permit could be refused after all the inspection entities had approved the design of a building.

After conducting the above-referred corruption risk analyses in the areas of construction processes, the STT addressed the State Territorial Planning and Construction Inspectorate under the Ministry of Environment of the Republic of Lithuania, requesting it to carry out inspections of the compliance of the actions of construction participants with the requirements of legal acts regulating construction and of the lawfulness of the construction in respect of 7 cases of the construction. After carrying out the State supervision of the construction in the above-referred cases, the State Territorial Planning and Construction Inspectorate under the Ministry of Environment of the Republic of Lithuania issued 3 findings on unauthorised construction and gave mandatory instructions not to carry out the construction of a structure or its part, found one unlawfully registered construction completion declaration for the revocation of which it will apply to the court.

³⁸ Source:

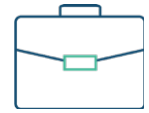
<https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1052>

<https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1070>

<https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1077>

<https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1078>

Anti-corruption assessment conclusion concerning the transparency of state land use



Although the STT does not assess decisions that are essentially policy-making in one area or another, the anti-corruption specialists of the STT have pointed out that specific corruption risk factors may arise after the land reform. The transfer of state land management functions to municipalities can have a negative aspect related to the decentralisation of state land administration, because it is likely that different municipalities would apply and implement different practices, which would make it more difficult to ensure the supervision and control of the legality and justification of the decisions taken in municipalities.

Municipalities are allowed to use state land at their discretion, based on the criterion of public benefit,

which is abstract and, therefore, open to overly broad interpretation.

It is also relevant that, if municipalities are granted the right of trust over all state land in the territory of the municipality, there is a potential risk in decisions concerning the management and use of such land that municipalities will, first of all, aim at ensuring their own interest (the interests of the municipality or the local community) rather than the national-level public interests in their decisions. It should be noted that in the future there may be fewer possibilities to put an immediate end to the unlawful management of public land.

Anti-corruption assessment conclusion concerning the protection of green areas



According to the STT experts, the legal regulation on the protection of green areas is defective from an anti-corruption point of view, as according to the description approved by the Minister of Environment, the implementation of green area norms can be assessed by taking into account the data of green areas and forests that are not included in the territories of cities, towns and resorts, which would distort the actual indicators related to the green areas of cities, towns and resorts. This may lead to the reduction of the area of public green spaces per one resident and in the areas of exist-

ing green spaces in cities, towns and resorts bordering forests.

In cities, towns and resorts, industrial and other commercial sites may also be unjustifiably exempted from the obligations related to green areas and the burden of establishing green spaces will be shifted to other persons. The Prosecutor General's Office of the Republic of Lithuania, taking into account the assessment by the STT and the public interest in the above-referred description, initiated the procedure for the defence of the public interest.

HEALTHCARE

Corruption risk analysis in the areas of licensing of natural persons and legal entities, quality control of healthcare services and ensuring the safety of patients' rights at the State HealthCare Accreditation Service under the Ministry of Health (hereinafter – the Accreditation Service)³⁹.

It has been found that it is possible under the current procedure for healthcare specialists to avoid liability for infringements, because healthcare institutions are not obliged to inform the Accreditation Service about inappropriate performance of licensed activities by healthcare specialists and about the infringements identified in their activities. In addition, when considering corruption-related infringements by healthcare professionals, including those related to convictions for corruption-related offences, the Accreditation Service can, provided that it does not violate the requirements of legal acts, apply more favourable grounds for restricting their licensed activities, for example, by prohibiting

single-field medical practice under several existing licenses rather than medical practice in any field.

In addition, legal acts provide for a disproportionate determination of the gravity of infringements, allowing doctors who have committed corruption-related offences to obtain a new licence of activities after three months.

Corruption risk analysis in the National Health Insurance Fund under the Ministry of Health of the Republic of Lithuania (hereafter – the NHIF), in the Hospital of the Lithuanian University of Health Sciences Kauno Klinikos, the Kaunas Hospital of the Lithuanian University of Health Sciences, the Klaipėda University Hospital, the National Vilnius University Hospital, and the Ukmergė Hospital: (1) preparation of technical specifications for joint replacements and their components of all types and localisations and assessment of suppliers' tenders; (2) allocation and use of the purchased replacements



³⁹ Source: <https://www.stt.lt/korupcijos-preve-cija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1076>

and their components to healthcare institutions (hereinafter – PHCIs) in the provision of arthroplasty services⁴⁰.

The analytical anti-corruption intelligence review revealed a flawed practice of setting up commissions for the drafting of technical specifications for endoprostheses, whereby the heads and board members of associations that receive financial support from endoprostheses suppliers, as well as persons related to them by subordinate relations, had been appointed to the commissions. In addition, the corruption risk analysis identified that in some cases members of the technical specification drafting commissions had not fulfilled or inadequately fulfilled their obligations to declare their

private interests and/or to abstain from participation in decision-making, and that the NHIF had not ensured that experts with private interests should not participate in any form in the drafting, deliberation or adoption of decisions.

It has also been identified that there had been a trend that PHCIs patients more often received hip or knee replacements of a particular model, supplied by the suppliers with direct or indirect relations with the heads and doctors working in PHCI units. It should be noted that, in the drafting of specifications and procurement of joint replacements, the analysis of supplier competition and market research was not sufficiently detailed.



LOCAL GOVERNMENT

Corruption risk analysis in Prienai district municipality in the areas of maintenance, repair, construction and safe traffic organisation of roads and streets of local significance⁴¹.

It has been identified that the three-year priority list for the reconstruction or repair of roads (streets) are not based on the information gathered by Prienai District Municipality about the actual condition of roads (streets), about the reconstruction, repair and maintenance works carried out or on the strategic plans for development of the infrastructure of the roads (streets), but on the lists of roads and streets to be repaired next year in municipal districts as approved in the meetings of elders according to undefined selection criteria. In addition, the decisions of the municipality whereby the projects (objects) not implemented in one year are not included in the list to be approved in the following

year or whereby the timing of their implementation is changed without specifying the purpose and/or reasons, do not ensure the implementation of some of the projects (objects), which have been included in the list. Decisions of the municipality whereby such lists are amended are taken without specifying the objectives and/or reasons for the amendment and in breach of the procedure laid down by the municipality itself, i.e. without coordinating them with the commission responsible for drawing up the above-referred list.

Similar corruption risk factors have also been identified in other municipalities (city municipalities of Kaunas and Klaipėda, district municipalities of Kaunas, Klaipėda and Šakiai) after an integrated anti-corruption assessment of the legal acts regulating the maintenance, repair, construction and organisation of safe traffic of roads and streets of local significance.

Corruption risk analysis in public procurement procedures for infrastructure objects in Kaunas City Municipality⁴²



The analysis revealed that almost half of the procurements carried out in Kaunas City Municipality are not included in the annual procurement plan of the municipality, and due to the unregulated determination of the value of procurements, it is not clear on what their value is based. Moreover, there is possibility in the municipality to carry out public procurement of infrastructure objects without carrying out the market research procedure defined by the municipality itself. Procurement initiators have too much discretion in determining or justifying the planned value of the procurement of infrastructure objects for which a technical design is required. In practice, the construction cost estimate defining the value of such procurements is not confirmed by a document of the municipality. It has also been identified that all decisions relating to the modification of the procurement contracts examined concerning

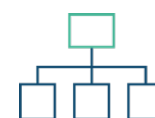
quantities or volumes are taken by one person. In practice, one person takes all decisions relating to supplementary agreements on changes in the quantities (volumes) of works which withdraw part of the works provided for in contract and/or provide for additional works not foreseen in the contract, and/or the works specified in the contract in excess of the foreseen quantities.

Such agreements are made for the majority of contracts for the construction, reconstruction or capital repairs of the infrastructure objects of the municipality. Moreover, the public procurements of infrastructure objects of the municipality do not identify potential agreements that restrict competition, the municipality does not take sufficient measures to prevent potential concerted practices of public procurement participants.

⁴⁰ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1034>

⁴¹ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1033>

⁴² Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1071>



Corruption risk analysis in the area of organisation of municipal waste management systems in the municipalities of Alytus city, Jonava, Kėdainiai, Tauragė, Šiauliai, Šilutė districts⁴³

It has been identified that in some cases the municipalities of Alytus city, Jonava, Kėdainiai, Tauragė, Šiauliai, Šilutė districts do not ensure effective supervision and control over the quality of the municipal waste management service because this service is assessed on the basis of indicators which do not have clearly defined specific values. In addition, not all quality control processes are clearly and comprehensively regulated, which can lead to risks of unevenly applied control procedures and subjectively applied sanctions or abuse of the possibility to avoid them. The analysis also revealed that in some cases public procurement tenders for the selection of a municipal waste manager – carrier are done without ensuring their full transparency and that the control of these procurement procedures does not always ensure the implementation of the principles of equality, non-discrimination and transparency of public procurement. Situations have been identified where representatives of potentially interested parties were directly involved in public procurement procedures and decisions were taken to reject the tender of the tenderer who had quoted the lowest price. In some cases, municipal waste management services had been procured by means of negotiated procedure without prior publication by

contacting one supplier on the grounds of extreme urgency, which, in the view of the STT officials, can potentially restrict competition and unjustifiably favour individual suppliers, if the choice of such procurement method is not justified in a proper manner. The total value of such procurement procedures for the period from 1 January 2019 to 30 April 2022 was almost €1 million. Information about cases where public procurement had been carried out by potentially violating the provisions of the Law on Public Procurement has been referred to the Public Procurement Office for assessment in accordance with its competence.

In addition, the analysis of the information provided by the analytical anti-corruption intelligence officers has revealed patterns related to potential interest in favourable decision-making or to the creation of exceptional conditions, as well as to potential situations of conflict of interest – the employees holding managerial positions in the regional waste management centre were related by close kinship, one of them was the initiator of the procurement procedures of this entity and was a member of the council of the municipality, and the other was an official holding a managerial position at the administration of the municipality.

Anti-corruption assessment conclusion concerning the funding of non-governmental organisations in some municipalities⁴⁴



The anti-corruption assessment revealed that the legal acts of the municipalities of Šiauliai, Marijampolė, Vilkaviškis, Kazlų Rūda, Prienai, Jonava and Pasvalys provided for the possibility of non-competitive funding of non-governmental organisations (hereinafter – NGOs) in potential breach of the Law on Development of Non-Governmental Organisations, according to which funding to NGOs can be provided from the budgets of the State or municipalities of the Republic of Lithuania only by way of competition. The above-referred municipalities also did not

have clear criteria for selecting the NGOs to receive funding without competition.

The entities that made decisions and/or the entities that offered funding had been, in principle, given unlimited discretion to make decisions concerning the applications received from NGOs. The municipalities do not publish on their websites information about the NGOs which have submitted applications in competitions but have not received funding, nor do they publish information about the amounts of funding requested by NGOs.

⁴³ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1079>

⁴⁴ Source: <https://e-seimas.lrs.lt/portal/legalAct/lt/TAK/bec89ca29de611ec9e62f960e3ee1cb6?positionInSearchResults=10&searchModelUUID=6e-ec87f-2ede-4f23-8fbf-646c724b4c75>

Anti-corruption assessment conclusion concerning the control of the use of buildings (premises) according to their purpose⁴⁵



Legal acts obligate the entities responsible for the supervision of the use of buildings to carry out on-site inspections at least once a year of all special buildings and multi-apartment residential houses with a height of up to 5 storeys. This, inter alia, includes checking whether the building (its premises) is being used according to its purpose. In practice, however, this obligation is not sufficiently fulfilled. For example, in 2021, inspections were carried out of about a quarter of special buildings, i.e. 3,715 out of 14,066 special buildings.

The legal regulation establishing the procedure for supervising the use of buildings does not regulate how to carry out the procedure of a special-purpose inspection of a building (premises), whether the user uses the building (premises) according to its intended purpose, therefore, the public administration entities who carry out the supervision apply different practice, which not always is most corruption resilient.

ENVIRONMENTAL PROTECTION



Corruption risk analysis in the field of environmental impact assessment (hereinafter – EIA) of planned economic activities related to the development of wind energy projects in the Environmental Protection Agency (hereinafter – AAA), the State Service for Protected Areas (hereinafter – the VSTT) under the Ministry of the Environment and in the municipalities of the Akmenė, Kelmė, Plungė and Telšiai districts⁴⁶.

It has been found that, in some areas, the VSTT potentially applied the procedures broader than provided for in the Law on Environmental Impact Assessment of the Proposed Economic Activity. Such practice when potentially unjustified additional conclusions are made and additional information can be requested can create preconditions for delays in the procedures and for decision-making based non-objective requirements. Moreover, the criteria and methodologies used to assess the compatibility of proposed economic activities to environmental criteria are not always clear. There is no approved list of methodologies and this can create preconditions for subjective selection of applicable criteria and assessment. It has also been identified that there are no clear, objectively measurable selection criteria for EIAs, which can influence the subjective assessment when the AAA takes decisions concerning obligatory EIAs. There is a likelihood that unequal criteria can be applied to different entities and that

there can be abuse in creating unequal and/or exclusive conditions for individual business entities during the selection for EIA procedures. It should be noted that the review by the analytical anti-corruption intelligence officers revealed cases where support had been provided for specific municipalities or communities at the same time when wind energy projects were being developed in these territories. The actions of wind energy developers and local communities and municipalities in relation to the support they provide or receive, in certain cases, may not be in line with the gratuitous nature of support as provided for in the Law on Charity and Support. For example, the municipalities and/or local communities in the Plungė and Telšiai districts had concluded or sought to conclude support agreements with the operators developing wind energy projects in that location. In the period 2019-2021, support ranging from €2,000 to €39,000 was allocated.

It has been observed that municipalities used to undertake or promise to a particular economic entity to provide favourable tax conditions and to deal with request or settle problems related to the entity's activities faster, although support should be non-reimbursable. This practice should be considered as highly defective and can be assessed as creating preconditions for unequal application of the provisions of law, preferential treatment and risks of abuse.

⁴⁵ Source: <https://e-seimas.lrs.lt/portal/legalAct/lt/TAK/be77ef1055c611edba0ded10be2fa21c?positionInSearchResults=0&searchModelUUI-D=19c18907-fc8f-43ee-9cfa-f6c89d8977bb>

⁴⁶ Source: <https://www.stt.lt/data/public/uploads/2022/07/kra-ismada-pav-vejo-energetikos-veiklos-sritis.pdf>

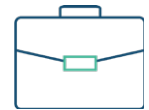


Anti-corruption assessment conclusion concerning the draft Law Amending the Law on Ambient Air Protection⁴⁷

The anti-corruption assessment of this draft legal act identified that this draft proposed to grant the right to municipalities to decide on the prohibition or restriction of fuel types and combustion facilities in the territory of the municipality or its part and, from 5 January 2025, to prohibit the use of solid fossil fuels (coal, peat, etc.) in the territory of the Republic of Lithuania. The anti-corruption assessment of the draft law concluded that the proposed provisions are likely to be defective from an anti-corruption perspective.

Without the definition of the criteria and principles for decision-making, the executive bodies of municipalities are given discretionary powers to take decisions at their own discretion, in a potentially biased and unjustified manner. The provisions of the draft also create legal preconditions for the adoption of the relevant decisions, however, they do not disclose the procedures for the justification of decisions to ensure transparency and objectivity.

TECHNICAL INSPECTION AND TECHNICAL EXPERT EXAMINATION OF VEHICLES



Analytical anti-corruption intelligence actions have identified potential risks of private conflicts of interest in the activities of companies carrying out the technical inspection and technical expert examination of vehicles. Specific cases have been identified when services related to the design, repair, maintenance, sale or

lease of vehicles are provided by shareholders or persons associated with shareholders of the companies that perform technical inspection and technical expert examination; such approach is defective from the anti-corruption point of view.

PROCESS OF THE RESTORATION OF LAND OWNERSHIP RIGHTS



The existing legal regulation, which establishes the division of functions between the National Land Service under the Ministry of Agriculture and municipalities and allows broad discretionary powers, creates preconditions for abuse of powers in the process of restoration of land ownership rights. The analytical anti-corruption intelligence activities have identified

that property rights to land plots had been acquired potentially unlawfully by associated persons and their groups with links to the Kaunas City Municipality and to the National Land Service under the Ministry of Agriculture, by taking advantage of the process of restoration of ownership rights to the surviving immovable property in Kaunas city.

⁴⁷ Source: <https://e-seimas.lrs.lt/portal/legalAct/lt/TAK/678b3d704bac11edb7269d52b4d4fd38?ifwid=5sqicot9a>

EXAMPLES OF THE IMPACT OF IMPLEMENTATION OF THE PROPOSALS MADE TO ADDRESS CORRUPTION THREATS



IN STATE LAND LEASE PROCESSES

In implementing the proposals made in the conclusion of the analysis of corruption risks in the areas of activity of the National Land Service and the Administration of Vilnius City Municipality⁴⁸, the conditions for early termination of state land lease agreements have been regulated in the legislation. It has been established, if the lessee of state land fails to remedy the identified breaches of the land lease agreement within the period of 2 years, a decision shall be taken to terminate the state land lease agreement before its term due to failure to use structures or facilities for their direct purpose. It has also been regulated that the lessee of state land may construct and/or reconstruct structures or facilities only after paying the fee specified in the Land

Law to the budgets of the state and the municipality in the territory of which the land plot is located.

The previous legal regulation did not provide for such a fee and defective practice was widespread to create exclusive and preferential business conditions for a builder/developer, who had leased a plot or plots of state land without an auction, at the expense of the State. The State used to receive from such land leases only a small state land tax, which did not match the real value of the land. Such practice of leasing State land created uneven conditions of competition and the environment that was not resilient to corruption.

IN THE PROCESSES OF REVISION OF DATA IN THE STATE CADASTRE OF FORESTS OF THE REPUBLIC OF LITHUANIA



In implementing the proposals made in the conclusion of the analysis of corruption risk in the State Forest Service and VĮ Valstybinė miškų urėdija⁴⁹, the State Forest Service (hereinafter – the VMT) has looked through almost 30,000 land plots of another designation registered in the Real Estate Register. After identifying that there were almost 800 ha more of the forest land registered in the State Forest Cadastre than in the Real Estate Register, corrections of the inventory errors and revisions of the data in the State Forest Cadastre have been initiated. The VMT has implemented a subsystem in the information system of the State Forest Cadastre to record changes in the forest land areas registered in the State Forest Cadastre in relation to the land plots registered in the Real Estate Register and to ensure the submission of new data on changes in forest areas to

the Real Estate Register. Taking into account the information provided by the STT on potential violations of business activities in forests in specific forest land plots, the State Forest Enterprise (VMU) has carried out inspections.

Following the identification of potential violations, 8 structures that had been illegally built on the forest plots managed under the right of trust by the VMU have been taken down, 1 structure started to be demolished, 21 buildings have been bought by legal entities for demolition, 4 building owners have been offered to sell the buildings for demolition, 1 building owner has been served with a request to voluntarily remove the structure from the forest, and administrative offence investigations have been commenced in 3 cases.

⁴⁸ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act943>

⁴⁹ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act944>



IN THE PROCESSES OF SUPERVISION AND CONTROL OF OPERATORS' ACTIVITIES BY THE STATE PLANT SERVICE

In implementing the proposals made in the conclusion on corruption risk analysis⁵⁰, the State Plant Service under the Ministry of Agriculture of the Republic of Lithuania (hereinafter – the State Plant Service) has amended the field-specific questionnaires for the supervision of economic entities, approved the new wording of the Rules for the Supervision by the State Plant Service of Activities of Economic Entities, and drawn up the Description of Procedure of the General Principles of Risk Management.

The State Plant Service has assessed and amended the legal regulation to clarify the actions to be taken by employees concerning the declaration of public and private interests and the provision of information to their direct manager in the situations of potential conflict of interest during the performance of their direct functions.

IN THE PROCESSES OF ADVERTISING OF MEDICINAL PRODUCTS AND MEDICAL DEVICES



In implementing the proposals made in the conclusion on the analysis of corruption risk in the Ministry of Health, the State Medicines Control Agency and seven healthcare institutions⁵¹, the Ministry of Health has amended the Rules on Advertising of Medicines and regulated the remote advertising of medicinal products, as well as established the procedure for reporting transferred values and the formats of the reports. The State Medicines Control Agency has established a mechanism for the control of promotional events of medicinal products based on the risk of controlled entities, created an electronic form for the registration of promotional events organised in healthcare institutions, where the advertisers of medicinal products would register all planned promotional events. The State

Medicines Control Agency has also started to publish on its website an electronic form of promotional events, data on the events held and reports on the values transferred to natural persons and legal entities in Excel format.

Healthcare institutions have regulated the organisation and conduct of events for the promotion of medicinal products and, in addition, established internal procedures for the organisation and conduct of events for the promotion of medicinal devices and medical equipment, strengthened internal control, appointed persons responsible for the control, and forbade any individual meetings between promoters of medicinal products and/or medical devices with healthcare professionals.

IN THE AREA OF IMPLEMENTATION OF THE SPECIAL PROGRAMME FOR MUNICIPAL SUPPORT FOR ENVIRONMENTAL PROTECTION



Following a corruption risk analysis at the Environmental Protection Department under the Ministry of the Environment and in the municipalities of Šiauliai and Akmenė⁵², Šiauliai City Municipality, implementing the proposals made, no longer appoints representatives of the entities who apply for the programme funds to the assessment commission of environmental education projects. It has also defined the duration of the commission's activities, the rotation of its members, and the requirement to sign a confidentiality undertaking and a declaration of impartiality. A description of the procedure for the planning, implementation and control of the use of funds of the Special Pro-

gramme for the Support of Environmental Protection by Šiauliai City Municipality has been prepared.

In implementing the proposals made in the conclusion on the corruption risk analysis, the Environmental Protection Department has included the development of the regulation of the procedure for carrying out inspections of the implementation of the Special Programme for Municipal Support for Environmental Protection in the Plan of Measures for the Implementation of the Corruption Prevention Programme for 2021-2027 of the Ministry of Environment.

⁵⁰ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1000>

⁵¹ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1002>

⁵² Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1015>



IN PUBLIC PROCUREMENT PROCEDURES OF HEALTHCARE INSTITUTIONS

In implementing the proposals concerning public procurement procedures made in the conclusions on the analyses of corruption risk (at public bodies National Vilnius University Hospital, Clinical Hospital of Vilnius City and Utena Hospital⁵³, in healthcare institutions of Klaipėda County⁵⁴, Vilkaviškis Hospital, S. Kudirka Hospital of Alytus County, Kaunas Hospital of the Lithuanian University of Health Sciences⁵⁵), the healthcare institutions have regulated or are planning to regulate the procedures for conducting, documenting, controlling market research, as well as the obligation of the procuring entities to assess whether there are any indications of agreements between suppliers that distort competi-

tion, and laid down the guidelines for identifying such agreements.

The healthcare institutions have introduced more transparent procedures for handling complaints and separated the functions of initiating and performing procurement. The Ministry of Health has amended the Description of Procedures for the Use of Medical Devices and introduced the possibility to have the technical maintenance of a medical device carried out not only by the manufacturer and their appointed persons thereby creating conditions for more competition among suppliers.



IN THE ACQUISITION, USE AND CONTROL OF MUNICIPAL AND SOCIAL HOUSING

In implementing the proposals made in the conclusion on the analysis of corruption risk after the corruption risk analysis in the municipalities of Neringa, Kretinga, Klaipėda and Palanga⁵⁶, the municipalities of Klaipėda and Neringa have drafted a new wording of the descriptions of the lease of municipal and social housing and established the criteria for the allocation of municipal housing, regulated the procedure and conditions for the lease of service housing, the procedure for the control over the use of the municipal and social housing, and the publication of information on municipal social housing. In addition, the municipalities indicated that they are also implementing other proposals made in the conclusion of the corruption risk analysis, which aim to regulate the separation of staff functions in the area of procurement and organisation of activities of municipal housing, regulate the procedures of the Housing Procurement Commission in more detail and define the grounds or cases for changing its composition, establish a precise mecha-

nism for the rotation of commission members, establish the criteria for the selection process (education, experience, special knowledge, etc.), which a person appointed to the commission must meet, organise more inspections of municipal and social housing and regulate that (in resort municipalities, a higher number of inspections should be carried out during the summer season).

This will prevent the possibility of influencing the decision-making concerning the allocation of and arrangements for social housing through the separation of employee functions in the area of procurement of municipal housing and the organisation of activities. This will, *inter alia*, help eliminate the risks of corruption when a predetermined person may be appointed to the municipal and social housing procurement commission rather than a skilled professional of the relevant field, as well as will prevent discretionary allocation of service housing to predetermined persons.



IN THE ISSUANCE OF BUILDING PERMITS

After the Ministry of Culture implemented the proposals made in the conclusion on the corruption risk analysis⁵⁷, special heritage protection requirements are now issued through the information system Infostatyba rather than through the electronic services of cultural heritage. Municipality employees no longer have to move information from one system to another, which has reduced the risk of data transfer errors. The proposal implemented should shorten the time

limits for the issuance of special heritage requirements and make it more convenient, faster and clearer for individuals to access the service. The Rules of Urban Planning and Architecture of Vilnius have been approved and will be applied in assessing architectural and urban solutions of construction designs, and a regular follow-up control of project assessment has been introduced, which will ensure a higher quality of construction projects. In addition, from now on,

⁵³ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1051>

⁵⁴ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1054>

⁵⁵ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1053>

⁵⁶ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1038>

⁵⁷ Source: <https://www.stt.lt/korupcijos-prevencija/korupcijos-rizikos-analizes/atliktos-korupcijos-rizikos-analizes/7471/act1052>

the builder will be able to consult the municipality's civil servant on the issues of a construction project through the information system Infostatyba, by e-mail, and by telephone only for 1 hour per working day during fixed hours. In implementing the proposals made in corruption risk analyses and in the conclusions on the assessment of anti-corruption legal acts or their drafts, amendments to the Law on Construction have been adopted on the separation of reconstruction and new construction. The amendments to the Law on Construction adopted by the Seimas of the Republic of Lithuania partially took into account the comments and proposals made by the STT. The Law on Construction stipulates that the total area of

a building constructed or reconstructed by individuals on their own may not exceed 300 square metres.

The possibilities of building new structures during a building reconstruction have also been reduced. Although the original draft provided for the possibility of increasing one or several external dimensions of a structure by not more than 50%, this provision could have led to an increase in the volume of the building of more than 300%, depending on the number of storeys. The adopted legal act no longer limits dimensions, however, it states that, in the case of reconstruction, the volume of the structure may not increase by more than 100%.

IN THE PROCEDURE FOR COMPLETING CONSTRUCTION BY MEANS OF A DECLARATION

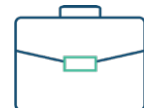


In the anti-corruption assessment conclusion⁵⁸ concerning the legal acts regulating the procedure for completing construction by drawing up a declaration, critical and other anti-corruption remarks have been made. The Seimas of the Republic of Lithuania has adopted amendments to the Law on Construction and has, to a significant extent, taken into account the remarks made in the anti-corruption assessment conclusion. The adoption of the legal act has reduced the risks of potential conflicts of interest, eliminated the conditions for the builder or the user of the building, who disagrees with the findings

of a design or building expert report, to order a repeated expert examination from another expert examination contractor without recording this in the information system Infostatyba.

The adoption of the legal act has also broadened the range of entities that can approve declarations on construction completion, established the grounds under which the head of expert examination of a building and the head of expert examination of a building design shall opt out from examination, and introduced more stringent liability.

IN THE PROCEDURE FOR MONITORING THE QUALITY OF DRINKING WATER



The anti-corruption assessment of Draft Law No. XIVP-2214⁵⁹ Amending the Law on Drinking Water has revealed that the proposed provisions of the draft law allow the State Food and Veterinary Service to exercise unlimited discretion, i.e., to decide on its own discretion whether the exceeding of the threshold values of microbiological and chemical indicators for drinking water, as set out by the Minister of Health, is insignificant and is not to be considered as a potential threat to human health.

The draft law did not regulate the grounds and procedures for the establishment of additional indicators by the Minister of Health with sufficient clarity and detail. The remarks made by the STT have been taken into account and the corruption risk factors identified have been removed from the legal regulation.

⁵⁸ Source: <https://e-seimas.lrs.lt/portal/legalAct/lt/TAK/ead76e30f6a011ecbfe9c72e552dd5bd?positionInSearchResults=0&searchModelUUUIID=b-840dd7d-c976-4fc5-94f4-73cba1b2c2b8>

⁵⁹ Source: <https://e-seimas.lrs.lt/portal/legalAct/lt/TAK/e9b3b0e1696e11ed8a47de53ff967b64?positionInSearchResults=0&searchModelUUUIID=d6709048-c08b-4dfb-b9fc-c8e72288e8ef>

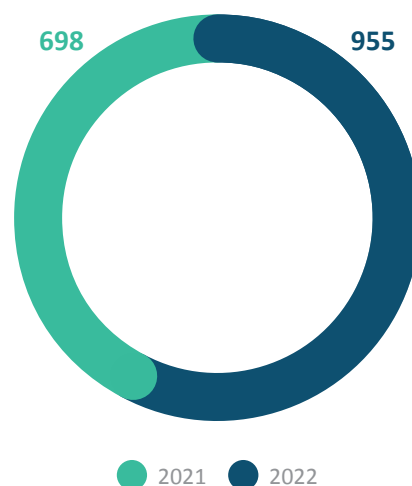
PROVISION OF INFORMATION FOR THE PROTECTION OF OBJECTS IMPORTANT FOR NATIONAL SECURITY

Pursuant to the Law on the Protection of Objects of Importance to Ensuring National Security, the Service provides information (conclusions) according to its competence to the Commission for Coordination of Protection of Objects of Importance to Ensuring National Security (hereinafter – the Commission) on the assessment of transactions of investors in strategically important sectors of the economy and companies important for national security.

In the assessment of investors and transactions in 2022, the STT carried out 955 or 36.8% more checks of natural persons and legal entities than in 2021 and provided the information to the Commission. In collecting and providing information to the Commission, analytical anti-corruption intelligence officials note that, in the context of the war in Ukraine, the risks associated with investments involving Belarusian and Russian nationals and companies (acting directly or indirectly through intermediaries) and their desire to establish a foothold in strategic sectors of importance to national security remain relevant but

are manageable. This would provide such companies, often associated with non-democratic regimes, not only with an opportunity to gain access to sensitive information about the critical infrastructure of the Republic of Lithuania, but also to delay the implementation processes of important projects. The activities of investors operating in the states attributed to tax havens are also relevant to the national security situation. There are risks that business entities of such countries are used in order to circumvent EU sanctions and conceal the true origin of investments.

Figure 16. **Changes in the number of checked natural persons and legal entities**



ISSUES IN CREATING THE LITHUANIAN ANTI-CORRUPTION ENVIRONMENT AND CHALLENGES TO BE ADDRESSED

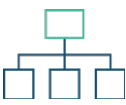
The preliminary report of the Organisation for Economic Co-operation and Development (OECD)⁶⁰ identifies key areas for action necessary in creating a corruption-resilient environment in Lithuania, which require the active involvement of the responsible public authorities:



Further develop the opening of data, making it available in an open and user-friendly form to strengthen the capacities of the users of such data – public organisations, media, etc. – to work with such data, to ensure the compatibility and interoperability of information resources.



Increase access to state registers, various databases and other potential sources of information, including big data because limited access hampers the effective activities of law enforcement institutions in Lithuania. In order to ensure the effectiveness of investigations, it is important to focus on increasing the opening of data not only for law enforcement purposes, but also for analytical activities, in order to form, *inter alia*, the development of evidence-based policy of creating a corruption-resilient environment.



Focus on encouraging public participation in governance at local government level. Gear activities towards the improvement of the effectiveness and independence of anti-corruption commissions, centralised internal audit services and municipal control and audit, the harmonisation and opening up of data at local government level.



Promote the implementation of corruption resilience standards in the private sector, as well as the dissemination and publication of information, including to Lithuanian businesses operating abroad, on how to identify and respond to manifestations of corruption, including potential bribery of foreign officials.

⁶⁰ The STT is implementing a technical assistance project funded by the European Commission “Effective Implementation of the National Anti-Corruption Strategy”, in which the OECD provides expert recommendations on the development and implementation of the National Anti-Corruption Agenda 2022-2033 (hereinafter – the Agenda) and its plans. As part of the project, the OECD experts have prepared a preliminary analytical review with information related to the National Anti-Corruption Programme 2015-2025 and its plans, identification of the areas for improvement and recommendations for the development and implementation of the new Agenda plans. Publication of the review is expected in April 2023.



ANTI-CORRUPTION AWARENESS AND COMPETENCES

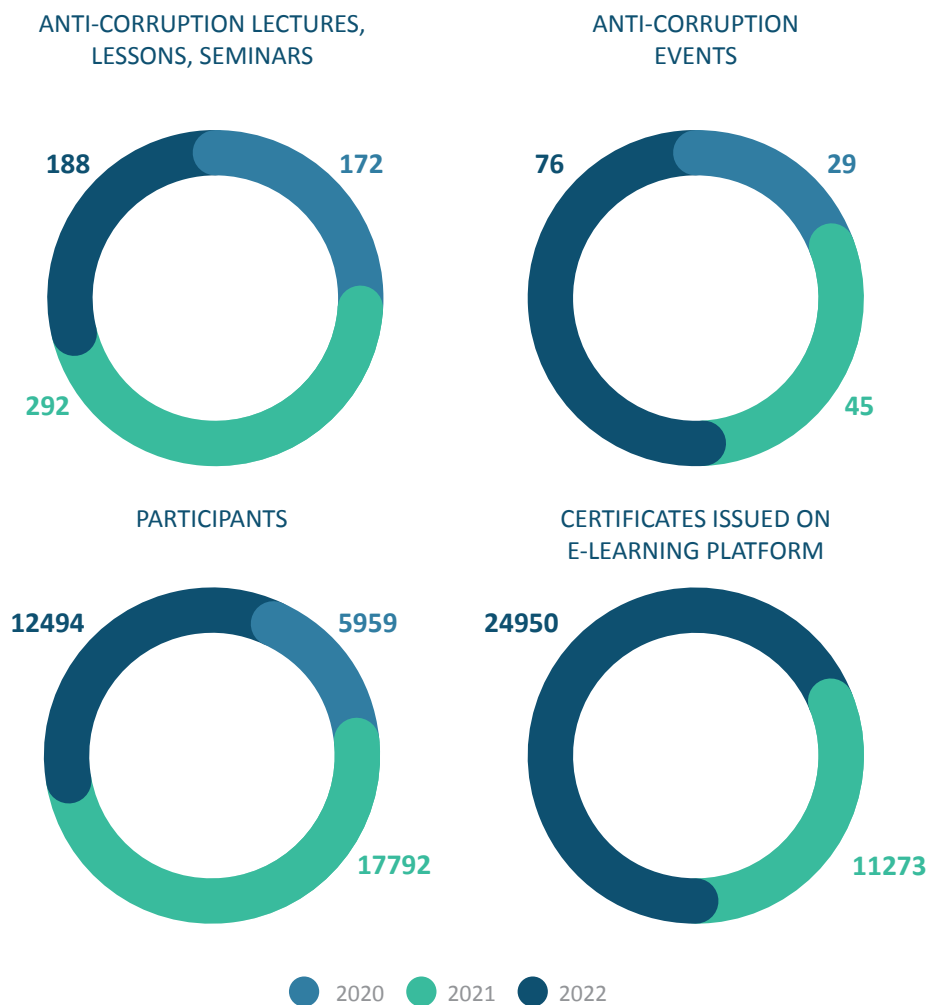
In the anti-corruption awareness and competence building, the STT aims at providing knowledge about the harm caused by corruption and at involving as many representatives of various fields as possible in anti-corruption activities.

The anti-corruption education activities of the STT are evaluated very highly. The individuals who have participated in the STT anti-corruption awareness-raising activities rate them at 9.4 out of 10 points possible.

During 2022, more people were involved in anti-corruption awareness-raising activities. Positive developments are also due to new tools for self-empowerment, such as the e-learning platform, where the number of certificates issued has more than doubled from 11,000 in 2021 to almost 25,000 in 2022.

To raise anti-corruption awareness, the Service organised 125 anti-corruption lectures, 22 anti-corruption lessons and 41 practical seminars in 2022 (the total number of lectures, lessons and workshops in 2021 was 292, in 2022 – 188) and 76 anti-corruption events (45 in 2021). Almost 12,500 persons attended all 264 events organised in 2022 (17,800 in 2021).

Figure 17. **Changes in the number of anti-corruption events**



THE FOLLOWING ANTI-CORRUPTION AWARENESS AND COMPETENCE BUILDING MEASURES HELD IN 2022 ARE NOTEWORTHY

“Integrity Academy” continued



The “Integrity Academy”⁶¹ initiated by the President of the Republic of Lithuania two years ago and implemented jointly with the STT became even more visible in 2022. 21 organisations and 19 mentors have joined the initiative, new modules for private business entities and teachers have been added, 11 events have been organised for sharing good practice of integrity where around 3,000 persons participated.

In 2022, the initiative “Integrity Academy” brought together 65 participants, of which 55 organisations and 10 teachers have been participating in the activities of “Integrity Academy” since the autumn of 2022 when a special programme was presented for teachers of general education and vocational schools of Lithuania, as well as for representatives of other fields who have knowledge and competencies in the area of anti-corruption awareness raising of pupils. More than 650 teachers took part in the events of the programme for teachers of the initiative “Integrity Academy”, which not only shared theoretical insights on the implementation of anti-corruption education in educational institutions, but also presented practical methods of activities that can be used in every school. The first eleven

organisations which participated in the activities of the “Integrity Academy” have strengthened their resilience to corruption and received certificates of confirmation in 2022. In the event “Integrity Celebration” that was held at the Office of the President on 20 December 2022, certificates of appreciation of the President of the Republic of Lithuania were presented for the largest contribution and active participation in the initiative “Integrity Academy”.

The best examples of integrity were presented during the events of the “Integrity Academy” and different practices of organisations are published on the website of “Integrity Academy” where information useful for organisations can be found by topics.

The Forum of “Integrity Academy”, which was conceived by participants of the 2021 National Anti-Corruption Hackathon, has been launched since 2022. In this forum, persons who care about integrity and work in the area of building of a corruption-resilient environment may ask questions of concern, discuss, share ideas and relevant documents, establish professional contacts.

E-learning platform used intensively



The e-learning platform has become a key instrument for raising anti-corruption awareness of public sector representatives. The users registered in this platform can find professional anti-corruption education training materials together with interactive exercises, relevant sociological research statistics, case law and good practice examples.

The e-learning platform can be used at any time and intensity convenient for users. The e-learning platform had eight topics when it was launched: the concept of corruption, corruption-related criminal offences, conflicts of interest, gift policy, protection of whistleblowers, healthcare, the relevance of the Organisation for

Economic Co-operation and Development in the context of bribery of foreign officials, bribery of foreign public officials (training in the English language); in 2022, it has been expanded with topics on the risks of corruption in the private sector, in public procurement and on ensuring the integrity of staff.

In 2022, 24,950 certificates were issued on the e-platform, which is 2.2 times more than in 2021 when 11,273 certificates were issued. The most popular topics according to the certificates issued in 2022: the concept of corruption (22%), gift policy (21%) and corruption-related criminal offences (14%).

⁶¹ Initiated on 9 December 2020. Source: <https://skaidrumoakademija.lt/>



International “Integrity Hackathon”

Building on the success of the national hackathon organised in 2021 when more than 100 integrity enthusiasts explored innovative solutions how to increase integrity, an international hackathon was held in 2022 and created opportunities for its participants to share ideas with the public about the future of integrity.

The international “Integrity Hackathon” was organised by the Service and AB Vilniaus šilumos tinklai. The partners of the Hackathon were European Partners Against Corruption (EPAC) and the European contact-point network against corruption (EACN). The two-stage event brought together more than 100 experts and enthusiasts of integrity and building of a corruption-resilient environment. Ideas in the semi-final, which took place virtually, were generated by as many as 13 teams from Lithuania, Ukraine, Azerbaijan, Moldova, Romania and Brazil and three teams were selected by an international jury for the final round. The participants were invited to explore how to integrate modern technologies to improve the integrity environment through the use of open and big data, how to strengthen anti-corruption awareness-raising in different groups of society, how to build greater resilience to different forms of corruption and expand international cooperation in order to build Europe with better integrity and share good practices.

The initiative turned the attention to different forms of corruption and invited to address relevant issues: from the administration of frozen assets of oligarchs of the Russian Federation during Russia’s war against Ukraine, making the European Union investments more transparent, the use of open data to systems to the measuring of the resilience of employees to corruption factors. Each team chose one of the six challenges proposed by the organisers and offered measures and ways by their ideas to tackle manifestations of corruption in Europe. The winners of the first place, representatives of the National Anti-Corruption Bureau of Ukraine (NABU), offered an augmented reality idea “Before – After” for raising public anti-corruption awareness, i.e. how to show a corruption-free environment through a smart app, for example, a quality road surface instead of a potholed road etc. The team of winners of the first place won the hackathon prize – a €15,000 voucher for distance learning courses at prestigious universities of the world.

It should be noted that 3 ideas that were first presented at the 2021 hackathon were also implemented in 2022: a forum on the website of the “Integrity Academy”, the board game “Antikoruptika” (*Anti-Corruption*), and the updated app “Report to STT”.



Board game “Antikoruptika” created

The board game is a new tool facilitating interesting conversations about corruption. In order to raise public anti-corruption awareness effectively, it is important to start building resilience to corruption at an early age and to strengthen the possibilities of educators to successfully contribute to the development of integrity principles in educational institutions. The main objective of the game “Antikoruptika” is to help teachers develop anti-corruption awareness among pupils. It is an educational tool that helps pupils to playfully analyse more than 100 different situations that may arise in different areas of public life (environment, healthcare, law enforcement, justice, law-making, local govern-

ment, education), to discuss and individually choose which actions would be the best to enhance or protect the common good. This game has been created in response to the need expressed by educators for more high-quality information and methodological tools on anti-corruption that would be easily applicable in the classroom.

“Antikoruptika” does not require much preparation, it offers much professionally developed information, interactivity, the game duration matches the length of the lesson, and the rules are very easy to understand, so as to make productive use of the lesson’s time for education.

Mobile app “Report to STT” updated



Every resident of Lithuania can now know if they have been exposed to corruption. In implementing one of the ideas proposed during the 2021 National Hackathon, the STT has updated the existing mobile app. Analysis of sociological and other statistical indicators shows that members of the public are reluctant to report the acts of corruption they see because they are not sure whether the act witnessed is really corruption. In addition to reporting corruption and reading the news, users of the app can also check whether they

may have potentially encountered manifestations of corruption.

A simple multi-level questionnaire, which can also be used by companies and organisations in their internal channels, can identify the initial indications of a potential act of corruption. If suspicions are confirmed, advice is given on what the user can do next, and a number of ways is proposed how and where to report corruption.

Anti-corruption awareness campaign in healthcare institutions



Patients and doctors need to be better informed about the damage caused by corruption in medical institutions. In view of the fact that the healthcare system is still considered to be one of the most corruption-prone areas of the public sector and in response to the need expressed by medical institutions for educational anti-corruption information for patients, a social advertising campaign “To Give or Not to Give?” was initiated. The social advertising aims to help visitors and staff of healthcare institutions to understand more clearly the harm of bribery and nepotism, to change the wrongful view of patients that they should pay extra for services to the view that such payments are unnecessary, and to

encourage the staff of healthcare institutions to refuse gifts and money from patients without feeling uncomfortable, as well as educate patients by explaining the reasons why gifts are not accepted. The video has been shared with all public sector institutions.

The institutions have been invited to publicise this video on the channels they use to disseminate information. This social advertisement is also shown during anti-corruption education trainings, lectures and practical seminars in order to increase public awareness and willingness to contribute to higher integrity in the health sector.

Annual competition for pupils “Creating Transparency Together”



The topic of integrity is becoming more and more popular in schools. The competition for pupils “Creating Transparency Together” is an ongoing initiative aimed at turning the attention of the staff and students of educational institutions to the International Anti-Corruption Day and to offer a convenient and effective tool for developing anti-corruption awareness in educational institutions. During the meetings, the proposed tool was positively assessed by educators. A proof to this is almost a threefold increase in the number of participants of competition in 2022 (a total of 3,312 pupils from 188 classes across Lithuania took part in the competition in 2022, and 1,200 pupils from 100 schools in 2021) and the growing interest of educators in anti-corruption events and initiatives. The interest of teachers in the topic of anti-corruption is boosted by the variety, quality and adaptability of the measures offered and the possibility to combine them. The winners of the

competition for pupils “Creating Transparency Together” were awarded in the event “Integrity Celebration” that took place at the Office of the President of the Republic of Lithuania on 20 December 2022 to celebrate both the competition and the two-year anniversary of the initiative “Integrity Academy”. During the event, the pupils received certificates of appreciation from the President of the Republic of Lithuania.

The competition also helped to update, make more effective and more targeted the anti-corruption education system skaidrumozenklelis.lt. During and after the competition, a significant increase in the number of new users of the platform was observed. An analysis of the statistical data of the platform for the period 2020-2022 shows that 76% of new users registered during the competition and 61% of transparency badges were awarded for the competition tests.



Stand “Transparent Society – Strong State” presented

In 2022, the Service increased its focus on informing the public about the state of transparency in Lithuania. The outdoor stand “Transparent Society – Strong State” increased the public awareness of the SST, its functions and the 25 years of activities of the Service, directions and results of its activities. In order to increase the accessibility of the information on the stand, it was displayed in Vilnius, Kaunas, Klaipėda, Panevėžys and Šiauliai. Additional information to the public about the location of the stand and its information was provided on the social networks of the STT, during anti-corruption education lectures and lessons.

This initiative also aimed at raising public awareness and motivation to contribute to the strengthening of transparency and reduction of corruption in the country, in particular by drawing attention to the importance of reporting corruption. This was one of the measures used to raise the awareness of the reporting methods and channels, the locations of STT offices and to increase the number of reporting persons.

Communication campaign “Corruption is a Vanishing Species” continued



To encourage the public to report cases of corruption and to remind where and how this can be done, the communication campaign “Corruption is a Vanishing Species” that was launched in 2021 received much attention in 2022. The success of “Corruption is a Vanishing Species” was recognised at the conference “Password 2022” held by the business news portal “Verslo Žinios” where it received two awards: the most effective campaign in the public sector and the campaign that was liked most by the conference participants.

In Belgium, this communication campaign was presented to the European Anti-Fraud Office (OLAF) Communicators’ Network. “Corruption is a Vanishing Species” won the second place among the most innovative anti-corruption initiatives in the annual conference and general assembly of the European Partners Against Corruption (EPAC) and the European contact-point network against corruption (EACN) that took place in Moldova.

INTERNATIONAL COOPERATION

International cooperation is one of the priorities of the Service's activities. Not only the image of the Service, but also the image of the State is promoted on international level, closer cooperation with foreign partners and organisations is ensured.

By participating in international activities, the STT not only aims at gaining practical knowledge about the experience of other countries in reducing corruption, but also seeks to contribute effectively to the efforts of Lithuania and the international community in combating corruption, creating a democratic and transparent society, strengthening trust in state institutions and ensuring the rule of law and public interest.

In 2022, the Service was in particular active on the international arena and, by its positive example, encouraged both Lithuanian and regional partners to step up their efforts to strengthen the anti-corruption environment in this challenging time for Europe and the entire world.

Following the election of Žydrunas Bartkus, Director of the STT, as President of the European Partners Against Corruption (EPAC) and the European Union contact-point network against corruption (EACN) (hereinafter – EPAC/EACN) for a two-year term at the conference that took place in Vilnius on 1-2 December 2021, the Service, in cooperation with the Austrian Federal Anti-Corruption Bureau (hereinafter – the BAK), started to carry out the functions of the Secretariat of the EPAC/EACN network from the beginning of 2022. The EPAC/EACN network brings together more than 100 national anti-corruption and police oversight authorities from 38 European states, with the participation of European Union agencies (OLAF, Eurojust, Europol). During the reporting period, the EPAC/EACN network continued to grow and was joined by the European Public Prosecutor's Office (EPPO) as an observer, as well as by new members: national anti-corruption or police oversight authorities from Ireland, Latvia, Lithuania, Moldova and Ukraine.

At the initiative of the Service, the EPAC/EACN Board, composed of representatives of the STT as well as the Irish, Austrian, French and Romanian authorities, has approved and started implementing the EPAC/EACN Operational Programme 2022-2023, set up three working groups for anti-corruption policy analysis, exchange of best practices and project activities. During the reporting period, the Service implemented Big Data analytics training for members of the EPAC/EACN

network, held three remote seminars on relevant topics, prepared and won an EU-funded project to implement the exchange of good practices for all members of the EPAC/EACN network, and, in cooperation with its partners in Lithuania, organised an international anti-corruption hackathon. The leadership of the Service in the EPAC/EACN network has led to a significant increase in its activity and visibility.

The 21st EPAC/EACN Annual Conference and General Assembly was held in Chisinau, Moldova, in November 2022 and brought together almost 200 participants from more than 20 European states. The conference made a significant contribution to the efforts of Moldova and its neighbouring country, Ukraine, which is fighting against the Russian aggression, to foster democracy and strengthen the fight against corruption. The conference was organised jointly with the National Anti-Corruption Centre of Moldova (CNA) by the officials of the Service acting as the Secretariat of the EPAC/EACN network.

The Service also initiated a workshop-discussion of EPAC/EACN members and partners in the 20th International Anti-Corruption Conference (IACC) that was held in Washington DC, USA, on 6-10 December 2022. The IACC is one of the world's largest and best-known anti-corruption and transparency forums, which, every second year, for more than forty years, brings together world leaders, representatives from the public and private sectors, academia and non-governmental organisations.

The efforts of the Service made it possible to achieve that the 2024 International Anti-Corruption Conference (IACC) will take place in Vilnius, Lithuania!

In 2022, as in 2021, STT representatives participated in the activities of international organisations:

Organisation for Economic Co-operation and Development (OECD):

- Working Group on Bribery in International Business Transactions (WGB);
- Anti-Corruption Network for Eastern Europe and Central Asia (OECD, ACN);
- Working Party of Senior Public Integrity Officials (SPIO);
- meetings of law enforcement officials.

The Council of Europe:

- Group of States against Corruption (GRECO).

European Union:

- European Commission's anti-corruption contact group (NCP);
- OLAF Anti-Fraud Communicators' Network;
- Europol Analytical Project on Corruption (AP Corruption).

United Nations (UN):

- UN Convention against Corruption and its working bodies (Implementation Review Group (IRG), Prevention of Corruption Working Group (PWG), etc.);
- UN Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE).

Participation in the activities of international organisations not only increases the visibility of Lithuania and the STT in the world, but is also an excellent tool to establish useful contacts with foreign law enforcement authorities, increase mutual trust, strengthen cooperation, detect and investigate corruption cases.

The main foreign partners of the STT in bilateral relations: the Polish Central Anti-Corruption Bureau (CBA), the Latvian Corruption Prevention and Combating Bureau (KNAB), the Estonian Internal Security Service (KAPO), the Corruption Crime Unit of the Estonian Border Guard and Police Service, as well as the Austrian Federal Anti-Corruption Bureau (BAK), the United Kingdom's Serious Fraud Office (SFO), Romania's National Anti-Corruption Directorate (DGA), Moldova's National Anti-Corruption Centre (CNA), Ukraine's National Anti-Corruption Bureau (NABU), the Prosecutor General's Office of the Republic of Azerbaijan, etc.

During the reporting period, the Service established contacts and strengthened cooperation with the anti-corruption institutions of the French Republic: the French Anti-Corruption Agency (AFA), with which a bilateral cooperation agreement was signed on 12 April 2022, the French High Authority for Trans-

parency in Public Life (HATVP), the French High Authority for Transparency in Public Life (HATVP), and the French Central Office for the Fight against Corruption, Financial and Fiscal Offences (OCLCIFE). Bilateral meetings strengthened cooperation in the area of fight against international bribery with the USA authorities – the Department of Justice and the Securities and Exchange Commission (SEC). On 11-13 May 2022, a high-level regional anti-corruption seminar organised by the Service took place in Birštonas, with participation of the heads of anti-corruption institutions of Estonia, Latvia, Poland and Lithuania. Representatives of the Service also participated in a high-level regional anti-corruption seminar organised by the Latvian Corruption Prevention and Combating Bureau (KNAB), which took place in Sigulda (Republic of Latvia) on 19-21 October 2022. A Memorandum of Bilateral Cooperation was also signed with the Anti-Corruption Commission of Jordan.

By participating in international activities, the STT aims to present the anti-corruption progress of Lithuania and to share good practice, as well as get experience abroad.

During the reporting period, the Service hosted study visits for delegations from the Anti-Corruption Commission of Jordan (4 times) and the Prosecutor General's Office of Azerbaijan (1 time) in the framework of the EU-funded Twinning projects. Representatives of the Armenian, Austrian, Italian, Spanish, Kazakh,

Latvian, Polish, Moldovan, Portuguese, and Spanish institutions learned about the good practice of the Service during visits in Lithuania. Representatives of the Service kept improving their knowledge in study visits in the national anti-corruption institutions of France, Italy and Croatia.

The STT also prepared and implemented international projects. By transferring its experience, the STT contributes to the promotion of economic growth and social stability in the world, reduction of disparities between developed and developing countries, the integration of developing countries into the world economy.

The STT continues active participation in the implementation of the European Union Twinning Programme.

During the reporting period, the Service successfully completed the implementation of the European Union Twinning Project in Jordan "Support the Jordanian Integrity and Anti-Corruption Commission in the areas of integrity and corruption prevention".

From 1 February 2022, the Service started implementing a new project of the European Union Twinning Programme "Supporting the reform of Azerbaijan's criminal asset recovery and management system". The STT is the lead authority in these projects.

Together with public body Central Project Management Agency and foreign partners, the STT started implementing the project "Support to the Rule of Law in the Republic of Serbia" funded by the European Union.

The Service also contributes through project activities to the professional development of STT officials

and to the take-over of good practice. It should be noted that in the project activities carried out in the recent years, the Service also sought to involve and strengthen the qualifications of its national and regional partners – anti-corruption and law enforcement officials. During the reporting period, the Service carried out two projects funded by the Hercule III programme of the European Union in the field of anti-corruption and anti-fraud: the project completed in 2012 where big data analysts from the Service and its partners from the EPAC/EACN network received training and the international regional seminar that was held in Vilnius on 14-15 September 2022, where good practice was shared by officials from the anti-corruption and anti-fraud authorities of Lithuania, Latvia, Estonia and Poland.

In 2022, the Service prepared and was awarded funding for one more project funded by the European Union, which will start in 2023. This project will support the programme for good practice exchange between institutions in the EPAC/EACN network.



THE SERVICE IN NUMBERS

Figure 18. Appropriations allocated to the STT, thousand of euro

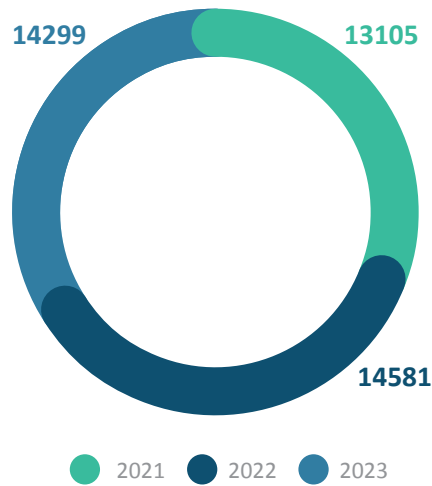


Figure 19. Changes in the number of employees

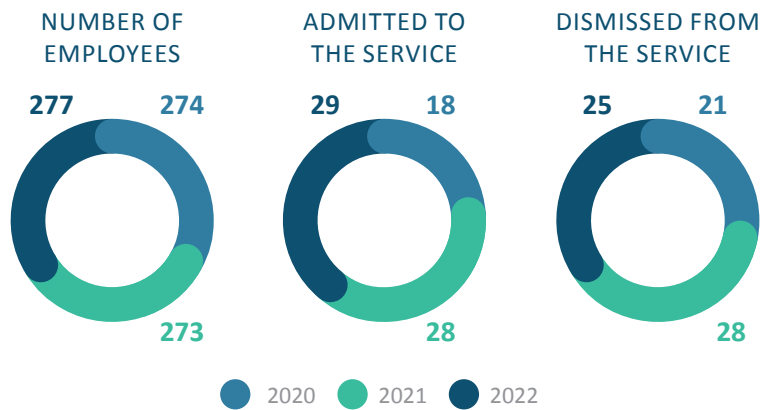


Figure 20. Employees by age groups

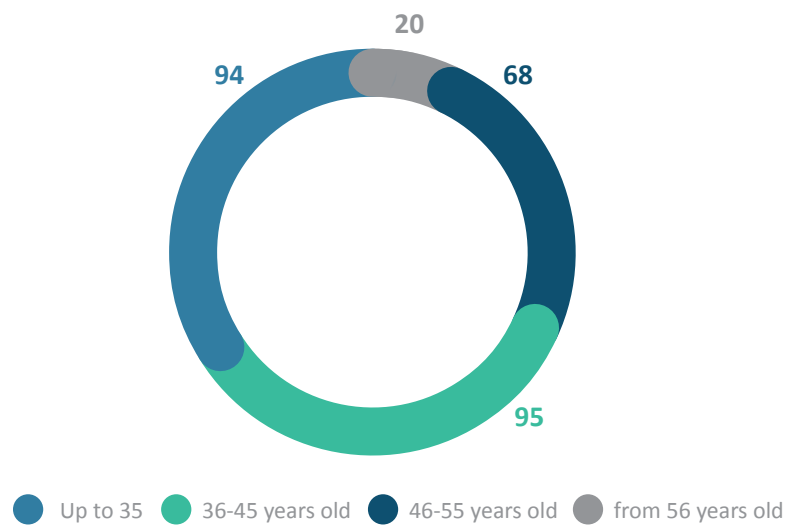


Figure 21. **Employees by gender**

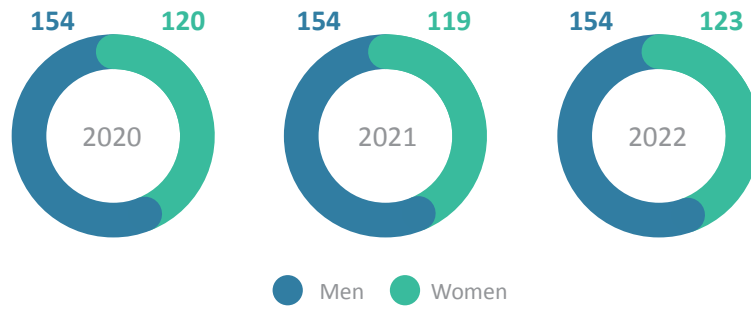


Figure 22. **Employees by education**

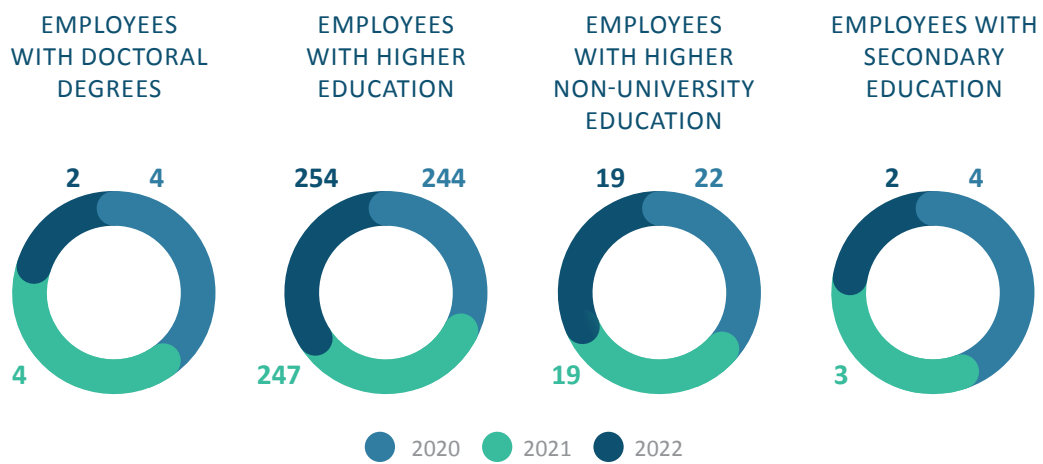


Figure 23. **Employees who undertook professional development**

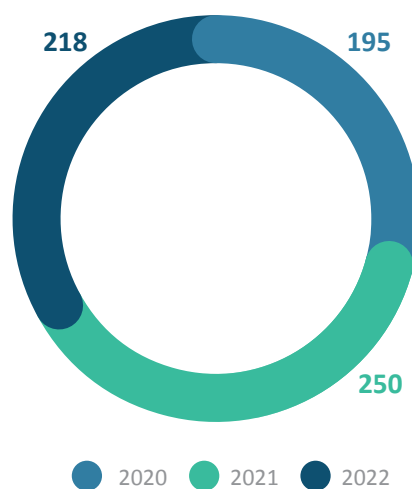


Figure 24. Areas covered in press releases

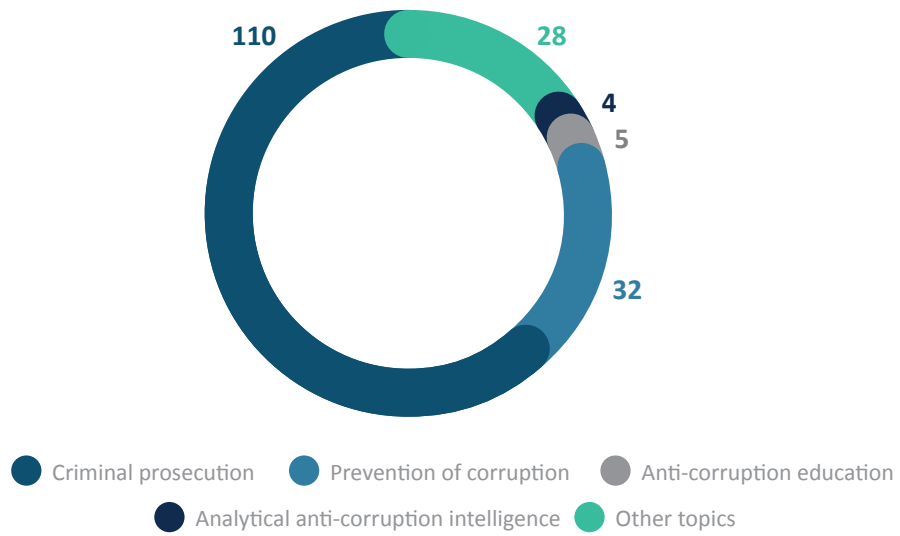


Figure 25. Written comments to the media on request

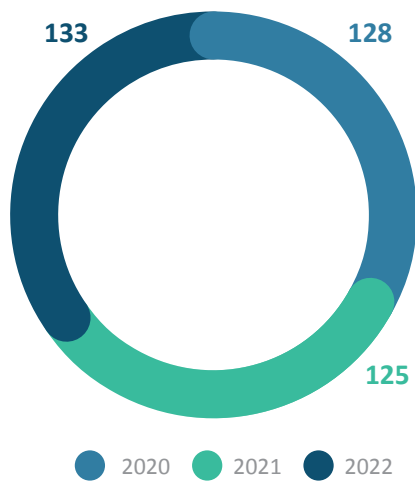


Figure 26. Posts on social media

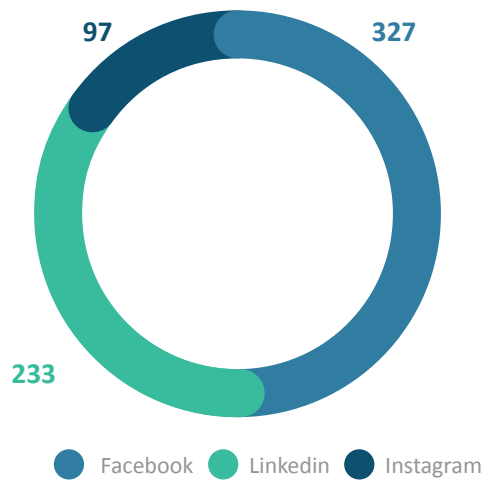
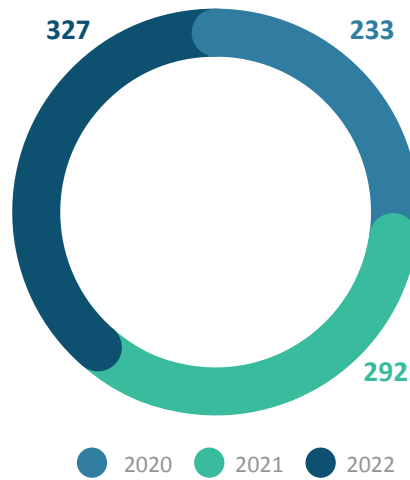


Figure 27. Posts on the STT Facebook account



More information:

