



SPECIAL INVESTIGATION  
SERVICE OF THE REPUBLIC  
OF LITHUANIA  
**ANNUAL  
REPORT  
2024**



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## FOREWORD

The Service consistently carries out its mission – to reduce corruption in the country, strengthen transparency in the public sector, and encourage public engagement in the fight against corruption. The year 2024 once again demonstrated that an effective anti-corruption environment is inseparable from institutional resilience, a strong legal system, close inter-institutional cooperation, and public trust in government. Last year was marked by a number of nationally significant events, involving both legal proceedings and anti-corruption initiatives.

One of the most consequential developments of the year was the Supreme Court of Lithuania’s ruling in the so-called “MG Baltic” political corruption case—one of the largest corruption cases in Lithuania. The case exposed how the intersection of politics, business, and the media can distort political decision-making through unlawful payments and agreements. Although the legal proceedings took a long time, the decision in this case demonstrates the resilience of our justice system to unlawful political influence and its capacity to combat corruption at the highest levels of power.

In 2024, the STT devoted considerable attention to other forms of corruption, such as the misuse of expense reimbursements by municipal council members. While the financial damage in these cases was relatively not substantial, they revealed systemic issues in local governance and sparked broad discussions about political transparency and accountability. Such cases serve as a reminder us that corruption is not limited to large, high-profile scandals – it can occur at every level of public administration.

In today’s geopolitical climate and in the face of external threats, it is more crucial than ever for all branches of government and the public to come together around responsible and transparent decision-making. Corruption is an internal enemy that not only weakens state and municipal institutions, undermines public resilience and trust in institutions, and slows economic development, but can also pose a risk to national security.

Effectively combatting corruption requires not only the investigation of crimes, but also proactive prevention. Transparency is not a self-sustaining value – it must be cultivated daily through sound decision-making, adherence to the highest ethical standards, and actions rooted in openness and accountability. In 2024, we continued to advance analytical anti-corruption intelligence and reinforced preventive measures to help state institutions, the public sector, and private businesses become more resilient to corruption risks.

We dedicated significant attention to public education and awareness-raising. To promote anti-corruption awareness, we proactively engaged with educational institutions, teachers, students, the business community, non-governmental organisations, and the Lithuanian Riflemen’s Union. We encouraged citizens to take an active role in applying anti-corruption principles in their daily environment and in fostering a shared culture of integrity.

Institutional partnerships remained a top priority. Last year, STT, together with other national security institutions of the Republic of Lithuania and Mykolas Romeris

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University, signed a strategic agreement to launch high-level security specialist training programme beginning in 2025. This initiative is not only a response to geopolitical challenges, but also an investment in the long-term resilience of the state.

We are proud that the 21st International Anti-Corruption Conference, held in Vilnius last year, brought together over 2 200 participants from 165 countries. As the world's largest forum on anti-corruption, it convened political leaders, senior law enforcement officials, academics, journalists, civil society representatives, and international organisations. The conference not only showcased Lithuania as a credible global partner, but also highlighted the country's progress in combating corruption and the STT's leadership in promoting best practices.

STT remained actively engaged on the international stage. We held the chairmanship of the European Partners against Corruption / European Contact-Point Network against Corruption (EPAC/EACN), contributed expertise to cooperation partners such as Ukraine, Moldova, Bosnia and Herzegovina, alongside others, and took part in the activities of various international working groups. Our officers further strengthened their competencies through internships, study visits, and specialised training. Ongoing involvement in

international initiatives enables us to continuously evolve and maintain our position among the leading anti-corruption institutions.

In addition, we successfully implemented a project funded by the Internal Security Fund, which enhanced the reliability and security of the STT's information systems.

The fight against corruption is not without its challenges. Working in this field means facing new tests and tasks every day – but also discovering new opportunities. To achieve meaningful change, we must act not only with determination and integrity, but also strategically – by raising public awareness, strengthening the legal framework, and ensuring that public service is grounded in the principles on transparency and accountability.

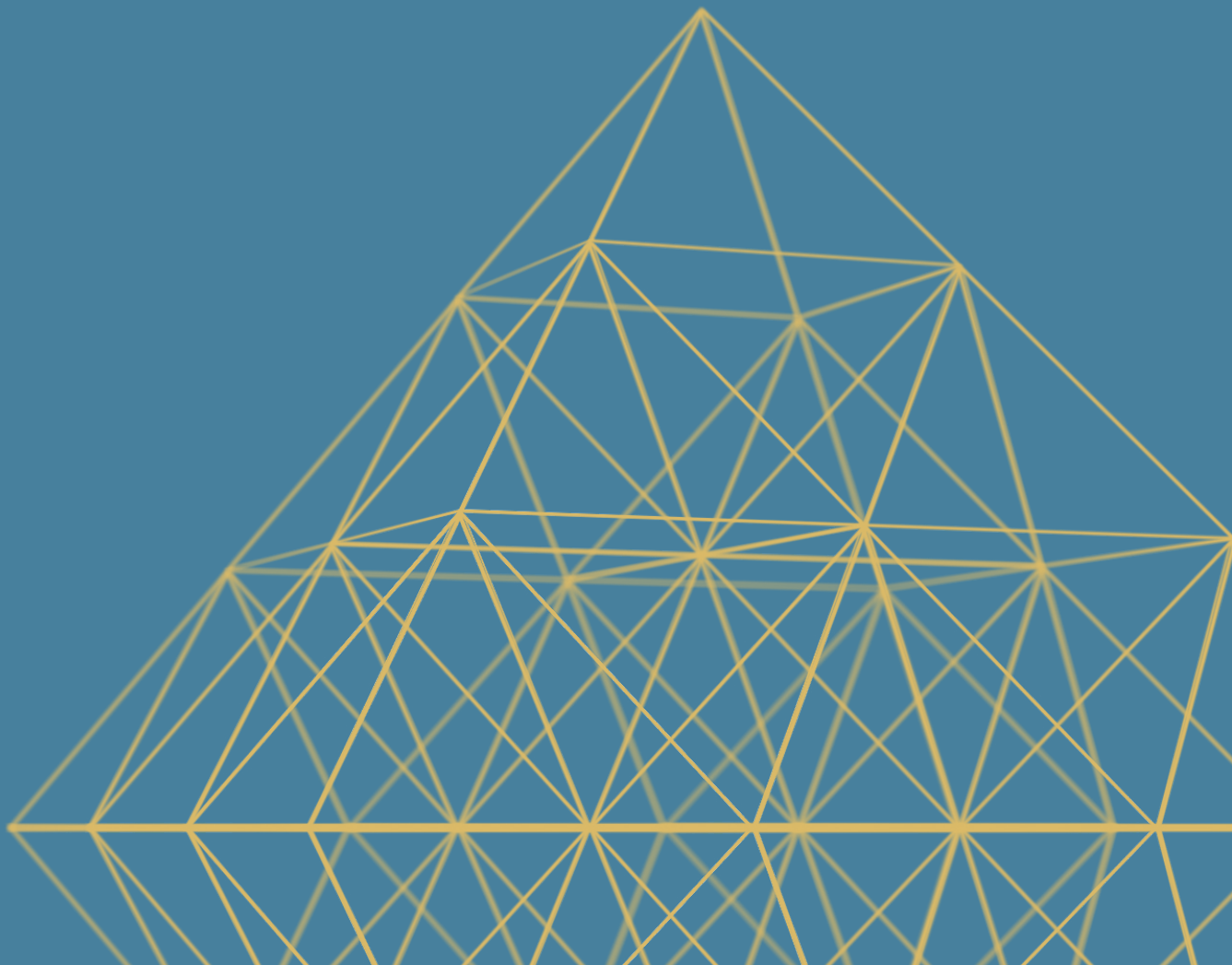
I extend my sincere thanks to all officers and employees of the STT for their unwavering dedication and professionalism. I am equally grateful to our partners – both in Lithuania and abroad – for their continued cooperation and shared commitment to our common goal. Only through joint efforts can we ensure that Lithuania grows stronger and more resilient, leaving no room for corruption.

LINAS PERNAVAS

Director of the Special Investigation Service  
of the Republic of Lithuania

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STATE OF  
ANTI-CORRUPTION  
LANDSCAPE: INSIGHTS  
FROM DIAGNOSTIC  
STUDIES



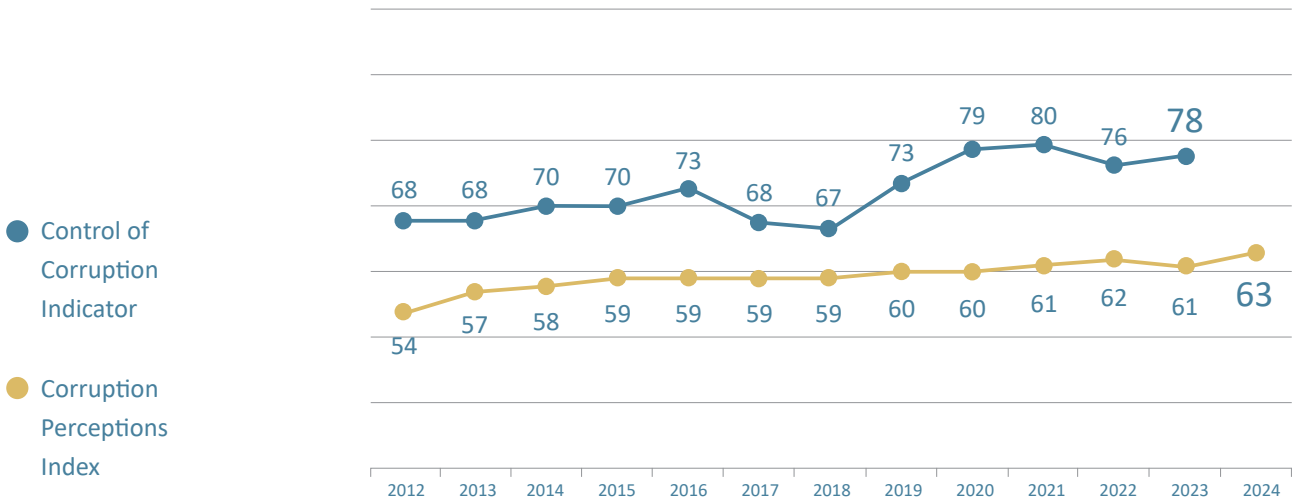
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POSITIVE TRENDS IN INTERNATIONAL  
ASSESSMENTS OF THE ANTI-CORRUPTION  
ENVIRONMENT

According to the most recent data from the World Bank, Lithuania’s Control of Corruption indicator has improved, increasing from 76 to 78<sup>1</sup> points. Lithuania ranks 12th among the 27 European Union (EU) countries and 48th globally out of 213 countries. Over the past decade, this indicator has increased by 10 points.

In the 2024 Corruption Perceptions Index (CPI)<sup>2</sup> by Transparency International, Lithuania scored 63 points—an increase of 2 points compared to the previous year—placing it 32nd among 180 countries. Lithuania’s global ranking improved by 2 positions, and it remains in 12th place within the EU. While Lithuania improved its anti-corruption performance indicators, 17 EU countries saw a decline, with improvements recorded in only 5 countries.

**Figure 1.** Indicators of Lithuania’s Anti-Corruption Landscape (2012–2024):



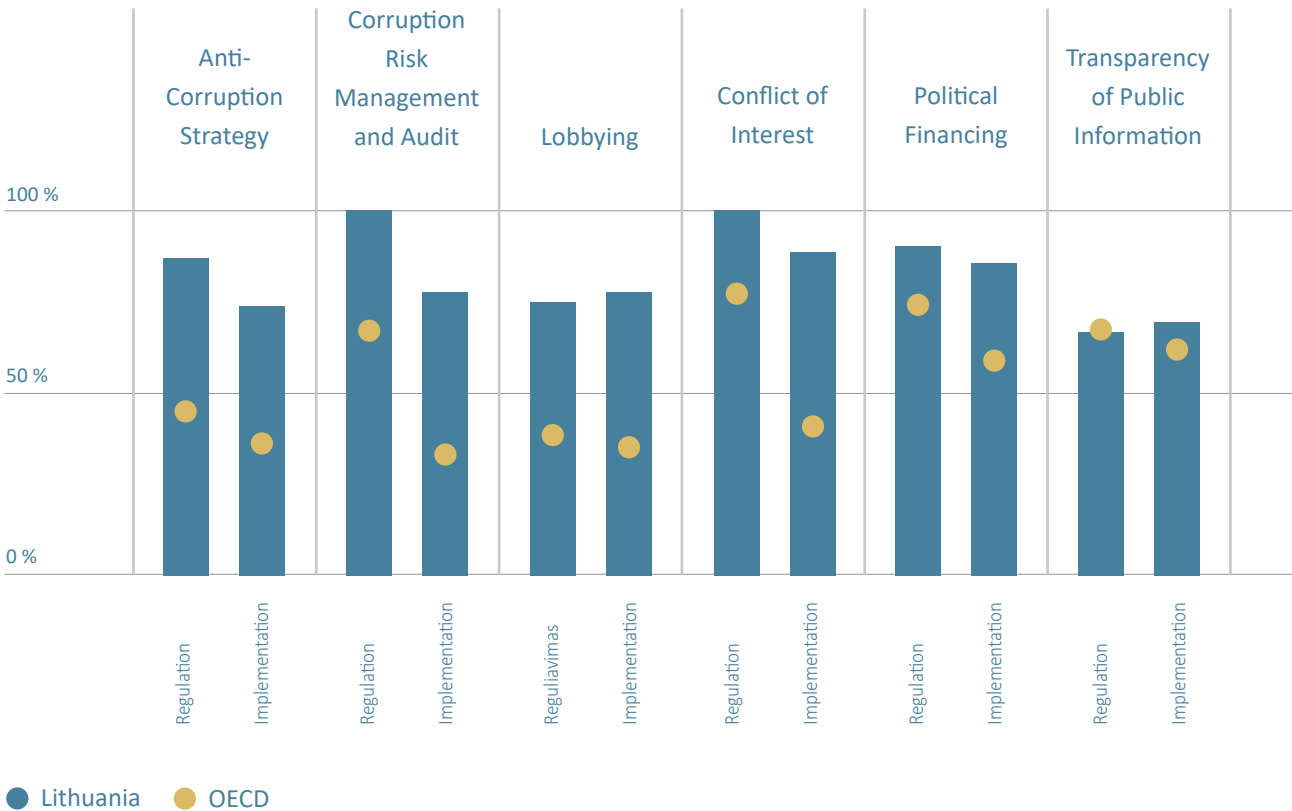
<sup>1</sup> World Bank, *Worldwide Governance Indicators*, 2024. Available online: <https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access>

<sup>2</sup> Available online: <https://www.transparency.org/en/cpi/2024>

The strong foundation of Lithuania’s anti-corruption policy and its alignment with international standards is also reflected in the Organisation for Economic Co-operation and Developments (OECD) report<sup>3</sup> on the Anti-Corruption and Integrity Outlook. Lithuania performs significantly above the OECD average in five assessed areas of anti-corruption policy and meets the OECD average in the area of transparency of public information.

Although there is a noted gap between regulations and their implementation in practice, this gap is significantly smaller in Lithuania (7 per cent) compared to the OECD average (17 per cent).

**Figure 2.** Lithuania’s Anti-Corruption Indicators Compared to the OECD Average



<sup>3</sup> OECD *Anti-Corruption and Integrity Outlook*, 2024. Available online: [https://www.oecd.org/en/publications/anticorruption-and-integrity-outlook-2024\\_968587cd-en.html](https://www.oecd.org/en/publications/anticorruption-and-integrity-outlook-2024_968587cd-en.html)

**STATE OF ANTI-CORRUPTION LANDSCAPE:  
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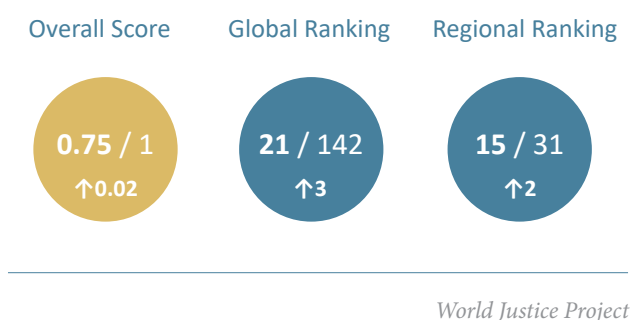
The Sustainable Governance Indicators by Bertelsmann Stiftung report<sup>4</sup> an increase in Lithuania’s score for the effectiveness of corruption prevention from 6 to 7 points compared to 2022. The report highlights the strengthening of Lithuania’s anti-corruption system and the growing number of high-profile court cases. Lithuania’s anti-corruption efforts, including robust public accountability mechanisms, were also positively evaluated in the European Commission’s report<sup>5</sup>.

In the 2024 Rule of Law Index<sup>6</sup>, Lithuania is ranked 18th out of 142 countries globally and 14th in the regional ranking<sup>7</sup>. While the overall rule of law score

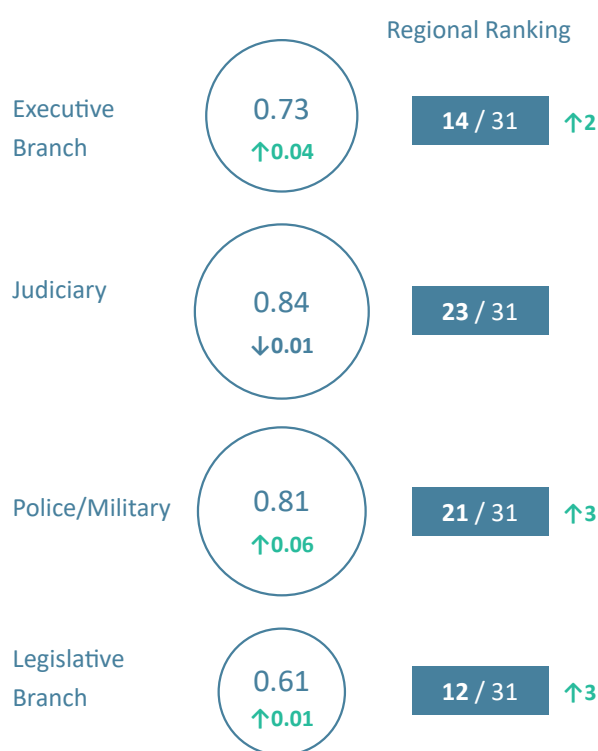
remained unchanged, Lithuania’s scores in Absence of Corruption increased. Compared to the previous year, Lithuania’s ranking improved by 3 positions globally (to 21st) and by 2 positions regionally (to 15th)<sup>8</sup>. The most notable improvement was observed in the Absence of Corruption of the police and the military, where the gap with the regional average for the defence sector significantly decreased<sup>9</sup>. Higher scores were also recorded for Absence of Corruption in the executive and legislative branches<sup>10</sup>.

**Figure 3. Components of the “Absence of Corruption” Indicator in 2024**

ASSESSMENT OF THE INDICATOR  
“ABSENCE OF CORRUPTION”



ABSENCE OF CORRUPTION



<sup>4</sup> Bertelsmann Stiftung, *Sustainable Governance Indicators*, 2024. Available online: [https://www.sgi-network.org/docs/2024/country/SGI2024\\_Lithuania.pdf](https://www.sgi-network.org/docs/2024/country/SGI2024_Lithuania.pdf)

<sup>5</sup> European Commission, *2023 Rule of Law Report – Country Chapter on the Rule of Law Situation in Lithuania*. Available online: [https://commission.europa.eu/publications/2023-rule-law-report-communication-and-country-chapters\\_en](https://commission.europa.eu/publications/2023-rule-law-report-communication-and-country-chapters_en)

<sup>6</sup> World Justice Project, *Rule of Law Index*, 2024. The study evaluates 142 countries. The index is expressed on a scale from 0 to 1, where 1 indicates full adherence to the rule of law. Lithuania scored 0.77 in 2024, the same as in 2023. Available online: <https://worldjusticeproject.org/rule-of-law-index/>

<sup>7</sup> In the study, the region includes the EU, the European Free Trade Association (EFTA), and North American countries (31 countries in total).

<sup>8</sup> Absence of Corruption Index is measured on a scale from 0 to 1, where 1 indicates full resilience. Lithuania’s 2024 score was 0.75 (0.02 points higher than in 2023). *Ibid.*

<sup>9</sup> In 2024 the score was 0.81 (0.06 more than in 2023). The regional average is 0.83. *Ibid.*

<sup>10</sup> Respectively in 2024 – 0.73 (0.04 more than in 2023), and in 2024 – 0.61 (0.01 more than in 2023). *Ibid.*

Properly implemented and maintained electronic public services can help reduce corruption risks by creating preconditions such as decreased bureaucratic burden, more transparent data accounting, and fewer direct contacts between officials and service recipients – all of which are linked to a lower probability of corruption. In recent years, Lithuania’s progress in the field of public service digitalisation has been recognised in the United Nations (UN) 2024 E-Government Development Index, where Lithuania moved up by three positions compared to 2022 and is now ranked 21st globally among 193 UN member states. Lithuania belongs to the group of countries with a very high level of e-government development<sup>11</sup>. A separate E-Participation Index is compiled to assess how effectively public authorities use electronic solutions to provide information to the public and engage representatives of society in decision-making processes. Lithuania was ranked 29th in the E-Participation Index – 38 positions higher than in 2022<sup>12</sup>.

Data openness can also significantly contribute to the development of a transparent and corruption-resilient state. According to the latest OECD OURdata Index (Open, Useful and Re-usable data), Lithuania is among the top ten OECD countries based on its strong performance. Lithuania is especially positively evaluated in the area of publicly accessible data (ranked 5th) and the availability of high-value datasets (ranked 10th), although the score for data provided in relevant and reusable formats is slightly lower (ranked 12th).<sup>13</sup>

<sup>11</sup> United Nations, *E-Government Development Index*, 2024. Lithuania received a score of 0.911 (scale 0–1). Available online: <https://publicadministration.un.org/egovkb/en-us/About/Overview/-E-Government-Development-Index>

<sup>12</sup> Lithuania received a score of 0.8356 (scale 0–1). *Ibid.*

<sup>13</sup> OECD *Open, Useful and Re-usable data (OURdata) Index*, 2023. Available online: [https://www.oecd.org/en/publications/2023-oecd-open-useful-and-re-usable-data-ourdata-index\\_a37f51c3-en.html](https://www.oecd.org/en/publications/2023-oecd-open-useful-and-re-usable-data-ourdata-index_a37f51c3-en.html)

## PUBLIC PERCEPTION OF THE PREVALENCE OF CORRUPTION REMAINS HIGH, BUT THE PERCEIVED PERSONAL IMPACT OF CORRUPTION IS LOWER

Despite the positive and improving indicators of the corruption prevention and control system, public surveys show a high perception of corruption as a relevant problem for Lithuania. According to the data of the European Commission-initiated population survey (Population Eurobarometer)<sup>14</sup>, in 2024, 83 percent of the respondents believed that the problem of corruption was widespread in Lithuania. This indicator is higher than the EU average (68 percent) and, compared to previous years, has not changed significantly. According to the data of the study “Map of Corruption in Lithuania 2023–2024”, among the nineteen problems assessed by the population, corruption, as a very serious problem, is indicated in fifth place<sup>15</sup>, and according to the opinion of the surveyed business leaders – in ninth place<sup>16</sup>. Notably, only 10 percent of business representatives consider corruption a very serious problem when operating in Lithuania. According to the assessment of civil servants, corruption, as a very serious problem, is in seventh place among the most relevant problems in Lithuania.

In 2024, the number of residents who say that the level of corruption in Lithuania has increased over the past three years has increased<sup>17</sup>. The share of respondents who think so is higher than those who

<sup>14</sup> European Commission, *Special Eurobarometer 548: Citizens’ attitudes towards corruption in the EU in 2024*. Available online: <https://europa.eu/eurobarometer/surveys/detail/3217>

<sup>15</sup> According to the data of the study *Map of Corruption in Lithuania 2023–2024*, 37 per cent of respondents indicated that corruption is a very serious problem in Lithuania (34 per cent in 2022). Available online: <https://www.stt.lt/analitine-antikorupecine-zvalgyba/lietuvos-korupcijos-zemelapis/7437>

<sup>16</sup> According to the data of the study *Map of Corruption in Lithuania 2023–2024*, 24 per cent of business executives surveyed indicated that corruption is a very serious problem in Lithuania (24 per cent in 2022). *Ibid.*

<sup>17</sup> In 2024 – 31 per cent, in 2023 – 26 per cent. Data from the study *Special Eurobarometer 548: Citizens’ attitudes towards corruption in the EU in 2024*. Available online: <https://europa.eu/eurobarometer/surveys/detail/3217>

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claim that the level of corruption has decreased<sup>18</sup>. It is noteworthy that although the perception of corruption as a widespread problem in Lithuania remains high, the proportion of residents who say they are personally affected by it in their daily lives is 3.5 times lower, bringing this indicator close to the EU average<sup>19</sup>.

### ACCORDING TO THE POPULATION, THE MAIN AREAS AND PROCESSES WHERE CORRUPTION IS MOST WIDESPREAD REMAIN UNCHANGED

According to the 2023–2024 “Map of Corruption in Lithuania” study<sup>20</sup>, the most widespread forms of corruption in Lithuania are nepotism, political party patronage, the adoption of favourable legislation benefiting specific interest groups, and exceedance or abuse of authority. Compared to previous years, the public perceives these forms of corruption as more widespread, with the perception of exceedance or abuse of authority increasing by as much as 10 percentage points.

More than half of business executives (56%) indicate that delays in decision-making are among the most common corruption-inducing situations. According to the Business Eurobarometer survey commissioned by the European Commission, the most widespread forms of corruption in Lithuania, as identified by business representatives, include favouritism towards friends and/or family members in public institutions

(this indicator decreased significantly by 10 percentage points compared to the 2023 survey), favouritism in the business environment, and political party financing in exchange for public procurement contracts or political influence. It is worth noting that these three forms are also identified as the most widespread forms of corruption across most EU member states. A distinctive feature of the Lithuanian business environment in the EU context is the perception of bribery prevalence, which is 13 percentage points higher than the EU average<sup>21</sup>.

### IN LITHUANIA, THE RISK OF BRIBERY IN THE BUSINESS ENVIRONMENT IS ASSESSED AS VERY LOW, WHILE THE HEALTHCARE SECTOR POSES THE HIGHEST RISK FOR RESIDENTS TO ENCOUNTER BRIBERY

According to the Citizens’ Eurobarometer survey, 7% of respondents in Lithuania reported having encountered or witnessed corruption in the past 12 months, compared to the EU average of 5%. When evaluating the prevalence of bribery in accessing public services, 7% of EU residents reported having been asked for a bribe in public institutions, while in Lithuania, this figure stood at 9%<sup>22</sup>. Similar trends were identified in the 2023–2024 “Map of Corruption in Lithuania” study<sup>23</sup>.

Assessing residents’ experiences, the highest risk of bribery remains in the healthcare sector – particularly in republican hospitals, clinics, and municipal hospitals. Most frequently, bribes are solicited or given in connection with surgical procedures. This trend is also confirmed by international surveys. According

<sup>18</sup> In 2024 and 2023 – 22 per cent. Data from the study *Special Eurobarometer 548: Citizens’ attitudes towards corruption in the EU in 2024*. Available online: <https://europa.eu/eurobarometer/surveys/detail/3217>. Also, according to the study *Map of Corruption in Lithuania 2023–2024*, 20 per cent of the population believed that the scale of corruption has decreased over the past year, while 25 per cent believed it has increased. Available online: <https://www.stt.lt/analitine-antikorupecine-zvalgyba/lietuvos-korupecijos-zemelapis/7437>

<sup>19</sup> In 2024 – 24 per cent, in 2023 – 21 per cent, EU average – 27 per cent. Data from the study *Special Eurobarometer 548: Citizens’ attitudes towards corruption in the EU in 2024*. Available online: <https://europa.eu/eurobarometer/surveys/detail/3217>

<sup>20</sup> Study *Map of Corruption in Lithuania 2023–2024*. Available online: <https://www.stt.lt/analitine-antikorupecine-zvalgyba/lietuvos-korupecijos-zemelapis/7437>

<sup>21</sup> In 2024: Lithuania – 34 per cent, EU average – 21 per cent. Data from the study *Flash Eurobarometer 543: Businesses’ Attitudes Towards Corruption in the EU 2024*. Available online: <https://europa.eu/eurobarometer/surveys/detail/3180>

<sup>22</sup> Data from the study *Special Eurobarometer 548: Citizens’ attitudes towards corruption in the EU in 2024*. Available online: <https://europa.eu/eurobarometer/surveys/detail/3217>

<sup>23</sup> According to the study *Map of Corruption in Lithuania 2023–2024*, 9 per cent of residents stated that they had given a bribe. Available online: <https://www.stt.lt/analitine-antikorupecine-zvalgyba/lietuvos-korupecijos-zemelapis/7437>

to the European Quality of Government Survey, 11% of respondents in Lithuania stated that they or a family member had given a bribe or unofficial gift to a public sector employee in the past 12 months – with 10% doing so in the healthcare sector<sup>24</sup>.

In the global context, Lithuania is classified as a very low bribery risk country for doing business<sup>25</sup>. In 2024, Lithuania ranks 18th out of 194 countries in the TRACE Bribery Risk Matrix, where a lower rank indicates a lower risk. However, within the European context, bribery-related indicators are higher. According to the Business Eurobarometer, 9% of business representatives in Lithuania reported that their company had been asked for or was expected to give a gift, additional payment, or service in exchange for obtaining permits (e.g. construction, business, or land use) or access to public services. This is 5 percentage points higher than the EU average of 4%. Data from the 2023–2024 “Map of Corruption in Lithuania” also indicates that the experience of bribery among company managers has not changed significantly since 2014<sup>26</sup>.

### ACCORDING TO PUBLIC OPINION, THE ENERGY SECTOR IS PERCEIVED AS THE MOST CORRUPT

Residents, business executives, and civil servants identify healthcare institutions, the Seimas (Parliament), the judiciary, municipalities, and political parties as the most corrupt institutions in Lithuania<sup>27</sup>. Compared to previous years, residents rate the anti-corruption reputation of the courts, the Seimas,

<sup>24</sup> University of Gothenburg. *European Quality of Government Survey*, 2024. Available online: <https://www.gu.se/en/quality-government/qogdata/datadownloads/european-quality-of-government-index>

<sup>25</sup> TRACE Bribery Risk Matrix, 2024. Available online: <https://www.traceinternational.org/trace-matrix>

<sup>26</sup> According to the study *Map of Corruption in Lithuania 2023–2024*, 5 per cent of business executives stated that they had given a bribe in the past 12 months when resolving business-related matters. Available online: <https://www.stt.lt/analitine-antikorpucine-zvalgyba/lietuvos-korupcijozemelapis/7437>

<sup>27</sup> Data from the study *Map of Corruption in Lithuania 2023–2024*. *Ibid.*

politicians, and political parties more negatively, whereas business executives and civil servants tend to evaluate most institutions more favourably<sup>28</sup>. Public and business assessments of the Ministry of Energy and its subordinate institutions have worsened for the third consecutive year, and this ministry and its area of governance are currently perceived as the most corrupt<sup>29</sup>. Among the ministries perceived as having the highest levels of corruption are also the Ministry of Health<sup>30</sup> and the Ministry of Agriculture<sup>31</sup>, along with their subordinate institutions.

Compared to 2022, the share of residents who consider the Ministry of the Interior and its subordinate institutions to be highly corrupt increased by 10

<sup>28</sup> According to the open-ended question in the study *Map of Corruption in Lithuania 2023–2024* regarding which institutions are currently perceived as the most corrupt in Lithuania: Healthcare institutions were named by 49 per cent of residents (2022 – 52 per cent), 17 per cent of business executives (2022 – 36 per cent), and 35 per cent of civil servants (2022 – 53 per cent); Courts – by 42 per cent of residents (2022 – 33 per cent), 10 per cent of business executives (2022 – 27 per cent), and 9 per cent of civil servants (2022 – 28 per cent); The Seimas – by 40 per cent of residents (2022 – 35 per cent), 24 per cent of business executives (2022 – 22 per cent), and 22 per cent of civil servants (2022 – 32 per cent); Political parties and politicians – by 25 per cent of residents (2022 – 16 per cent), 5 per cent of business executives (2022 – 19 per cent), and 6 per cent of civil servants (2022 – 13 per cent); Municipalities – by 25 per cent of residents (2022 – 24 per cent), 7 per cent of business executives (2022 – 25 per cent), and 10 per cent of civil servants (2022 – 40 per cent). *Ibid.*

<sup>29</sup> According to the study *Map of Corruption in Lithuania 2023–2024*, 44 per cent of residents (2022 – 40 per cent), 39 per cent of business executives (2022 – 33 per cent), and 26 per cent of civil servants (2022 – 28 per cent) stated that corruption is widespread in the Ministry of Energy and its subordinate institutions. *Ibid.*

<sup>30</sup> According to the study *Map of Corruption in Lithuania 2023–2024*, 35 per cent of residents (2022 – 35 per cent), 25 per cent of business executives (2022 – 23 per cent), and 29 per cent of civil servants (2022 – 33 per cent) stated that corruption is widespread in the Ministry of Health and its subordinate institutions. *Ibid.*

<sup>31</sup> According to the study *Map of Corruption in Lithuania 2023–2024*, 34 per cent of residents (2022 – 31 per cent), 28 per cent of business executives (2022 – 25 per cent), and 17 per cent of civil servants (2022 – 19 per cent) stated that corruption is widespread in the Ministry of Agriculture and its subordinate institutions. *Ibid.*

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percentage points, and among business executives – by 5 percentage points<sup>32</sup>.

At the municipal level, respondents most frequently identify public procurement departments or commissions, construction departments, land data departments, business licensing and permit departments, and departments of architecture, urban planning or territorial planning as the most corrupt<sup>33</sup>.

### ACCORDING TO RESPONDENTS, NOT ALL INTEREST GROUPS HAVE EQUAL OPPORTUNITIES TO PARTICIPATE IN DECISION-MAKING PROCESSES IN THE COUNTRY

When assessing decision-making in Lithuania, only 8% of the population, 14% of business executives and 15% of civil servants indicate that decision-making in Lithuania is open or very open. It is noteworthy that, for the third consecutive year, the

proportion of civil servants who assess decision-making as open has been decreasing<sup>34</sup>.

According to civil servants and business executives, the greatest influence is being sought in the energy, pharmaceutical, and construction sectors<sup>35</sup>. The most frequently mentioned forms of influence remain the same as in 2022: leveraging personal connections, informal meetings, and promises of financial rewards in exchange for favourable decisions<sup>36</sup>.

In the opinion of business executives, decision-making in Lithuania is most commonly influenced by registered lobbyists, associations, foundations, public relations agencies, and political party think tanks. The views of civil servants partially coincide with those of business executives, as they also identify registered lobbyists, associations, companies, political party think tanks, and trade unions among the most influential actors.

<sup>32</sup> According to the study *Map of Corruption in Lithuania 2023–2024*, 24 per cent of residents (2022 – 14 per cent), 16 per cent of business executives (2022 – 11 per cent), and 11 per cent of civil servants (2022 – 9 per cent) stated that corruption is widespread in the Ministry of the Interior and its subordinate institutions. *Ibid.*

<sup>33</sup> According to the data of the study *Map of Corruption in Lithuania 2023–2024*, that corruption is highly prevalent in the municipality's public procurement department or commission, in 2023–2024 was indicated by 52 per cent of residents (2022 – 50 per cent), 41 per cent of business executives (2022 – 38 per cent), and 30 per cent of civil servants (2022 – 30 per cent); in the construction department: in 2023–2024 it was indicated by 44 per cent of residents (2022 – 43 per cent), 37 per cent of business executives (2022 – 34 per cent), and 44 per cent of civil servants (2022 – 43 per cent); in the land data department: in 2023–2024 it was indicated by 32 per cent of residents (2022 – 34 per cent), 33 per cent of business executives (2022 – 28 per cent), and 32 per cent of civil servants (2022 – 31 per cent); in the business licensing and permits department: in 2023–2024 it was indicated by 30 per cent of residents (2022 – 30 per cent), 21 per cent of business executives (2022 – 18 per cent), and 20 per cent of civil servants (2022 – 21 per cent); in the architecture and urban planning or spatial planning department: in 2023–2024 it was indicated by 29 per cent of residents (2022 – 34 per cent), 31 per cent of business executives (2022 – 29 per cent), and 39 per cent of civil servants (2022 – 41 per cent). *Ibid.*

<sup>34</sup> In 2022 – 20 per cent, in 2021 – 31 per cent. *Ibid.*

<sup>35</sup> According to the data of the study *Map of Corruption in Lithuania 2023–2024*, that an attempt is being made to exert influence in the energy sector was indicated in 2023–2024 by 73 per cent of business executives (2022 – 77 per cent) and 68 per cent of civil servants (2022 – 70 per cent); in the pharmaceutical sector, in 2023–2024 it was indicated by 64 per cent of business executives (2022 – 62 per cent) and 63 per cent of civil servants (2022 – 70 per cent); in the construction sector, in 2023–2024 it was indicated by 53 per cent of business executives (2022 – 53 per cent) and 65 per cent of civil servants (2022 – 71 per cent). *Ibid.*

<sup>36</sup> According to the data of the study *Map of Corruption in Lithuania 2023–2024*, that influence is sought through personal connections was indicated in 2023–2024 by 58 per cent of business executives (2022 – 60 per cent) and 66 per cent of civil servants (2022 – 66 per cent); that influence is sought by participating in informal meetings, was indicated by 58 per cent of business executives (2022 – 61 per cent) and 65 per cent of civil servants (2022 – 65 per cent); that influence is sought by promising financial reward in exchange for a favourable decision, was indicated by 44 per cent of business executives (2022 – 40 per cent) and 48 per cent of civil servants (2022 – 47 per cent). *Ibid.*

## CORRUPTION IN PUBLIC PROCUREMENT – BUSINESS REPRESENTATIVES PERCEIVE GREATER RISKS AT THE MUNICIPAL LEVEL

In the Eurobarometer survey, business representatives were asked to assess how widespread they believe non-transparent practices are in public procurement. In Lithuania, the most frequently cited practices were the tailoring of procurement specifications to a specific company<sup>37</sup>, bid rigging through collusive agreements<sup>38</sup> (with both indicators 5 percentage points higher than the previous year) and involvement of bidders in the drafting of technical specifications<sup>39</sup>. The tailoring of procurement specifications to a specific company is considered the most widespread non-transparent practice in public procurement across most EU Member States.

Among Lithuanian companies that participated in public procurement over the past three years, 34% indicated that corruption had prevented them from winning a public procurement contract. This figure is 9 percentage points higher than in the previous year and 7 percentage points above the EU average. Similar trends are observed in the Map of Corruption in Lithuania 2023–2024, where an increasing number of business executives reported encountering situations in which winners were known in advance, or where personal connections or political pressure helped a competitor win<sup>40</sup>.

In the opinion of Lithuanian business representatives, corruption is more prevalent in public procurement organised by municipal authorities than by

<sup>37</sup> In 2024 – 63 per cent, in 2023 – 58 per cent, EU average – 61 per cent. Data from the study *Flash Eurobarometer 543: Businesses' Attitudes Towards Corruption in the EU 2024*. Available online: <https://europa.eu/eurobarometer/surveys/detail/3180>

<sup>38</sup> In 2024 – 51 per cent, in 2023 – 56 per cent, EU average – 49 per cent. *Ibid.*

<sup>39</sup> In 2024 – 49 per cent, in 2023 – 51 per cent, EU average – 49 per cent. *Ibid.*

<sup>40</sup> It should be noted that due to the small sample size, the margin of error for these indicators is higher and comparisons across periods have limited reliability.

national institutions. The risk perception for national institutions aligns with the EU average. However, at the EU level, no significant differences have been identified between the risk levels of procurement organised at the national and local levels<sup>41</sup>.

## ACCORDING TO BUSINESS REPRESENTATIVES, THE EFFECTIVENESS OF CRIMINAL PROSECUTION IN COMBATING CORRUPTION IS INCREASING, WHILE THE GENERAL PUBLIC REMAINS SCEPTICAL ABOUT THE ASSURANCE OF JUSTICE

Public perception of anti-corruption efforts remains a challenge both in Lithuania and other EU Member States. One in three (38 per cent) respondents believe that there are enough successful criminal prosecution cases in Lithuania to deter corruption<sup>42</sup>. However, eight out of ten residents agree that high-level corruption cases are not sufficiently investigated<sup>43</sup>. When evaluating the government's efforts to combat corruption, a majority of respondents consider them rather ineffective (67 per cent) than effective (26 per cent)<sup>44</sup>.

On the other hand, business representatives tend to assess anti-corruption efforts more positively. A majority—seven out of ten—Lithuanian business representatives believe that individuals or companies engaging in corrupt practices are likely to be reported

<sup>41</sup> According to the study *Flash Eurobarometer 543: Businesses' Attitudes Towards Corruption in the EU 2024*, 63 per cent of business representatives in Lithuania (2023 – 60 per cent; EU average – 52 per cent) believed that corruption is widespread in public procurement organised by municipalities, and 51 per cent (2023 – 54 per cent; EU average – 51 per cent) in public procurement by national institutions. Available online: <https://europa.eu/eurobarometer/surveys/detail/3180>

<sup>42</sup> In 2023 – 35 per cent; this result is higher than the EU average – 32 per cent. Data from the study *Special Eurobarometer 548: Citizens' attitudes towards corruption in the EU in 2024*. Available online: <https://europa.eu/eurobarometer/surveys/detail/3217>

<sup>43</sup> In 2024 – 81 per cent, in 2023 – 76 per cent; EU average – 65 per cent. *Ibid.*

<sup>44</sup> In 2023, 24 per cent of Lithuanian residents considered the government's efforts to combat corruption effective, while 68 per cent believed them to be ineffective. *Ibid.*

## STATE OF ANTI-CORRUPTION LANDSCAPE: INSIGHTS FROM DIAGNOSTIC STUDIES

to the police or prosecutors<sup>45</sup>. Furthermore, the number of respondents who believe that such individuals and businesses would be charged and brought to trial has significantly increased over the past year<sup>46</sup>. These indicators are among the highest across EU Member States. Nonetheless, fewer respondents are confident that the guilty parties would be strictly punished or sentenced to imprisonment by court decision<sup>47</sup>.

### THE PUBLIC IS WELL INFORMED ABOUT WHERE TO REPORT CORRUPTION, BUT THE WILLINGNESS TO DO SO REMAINS ONE OF THE LOWEST IN THE EU

When assessing who is primarily responsible for the prevalence of corruption, residents, business executives, and civil servants most often point to public officials, law enforcement officers, judges, and politicians. It is noteworthy that in 2023, the proportion of residents who believed that they themselves or their close social environment are also responsible for the prevalence of corruption in Lithuania decreased<sup>48</sup>.

In terms of corruption reporting potential, both residents and business representatives demonstrate low willingness to report corruption. Although one in two residents (55 per cent) trust the Special Investigation Service and 58 per cent know where to report corruption, only one in eight (13 per cent) would choose to do so. This is the lowest indicator since 2007.

<sup>45</sup> In 2024 – 70 per cent, in 2023 – 69 per cent. This is the second highest score in the EU after Denmark (72 per cent). EU average – 51 per cent. *Ibid.*

<sup>46</sup> In 2024 – 69 per cent, in 2023 – 62 per cent. This is the fourth highest result after Estonia (74 per cent), Denmark (70 per cent), and Poland (70 per cent); EU average – 54 per cent. *Ibid.*

<sup>47</sup> In 2024 – 40 per cent, in 2023 – 36 per cent; EU average – 41 per cent. The highest ratings were recorded in Denmark and Austria – 62 per cent. *Ibid.*

<sup>48</sup> According to the study *Map of Corruption in Lithuania 2023–2024*, 42 per cent of residents in 2023–2024 assumed personal responsibility for the prevalence of corruption (2022 – 48 per cent), while 43 per cent placed responsibility on their close social environment – family members, relatives, or acquaintances (2022 – 49 per cent). Available online: <https://www.stt.lt/analitineantikorpucine-zvalgyba/lietuvos-korupcijos-zemelapis/7437>

Among business executives, 71 per cent know where to report corruption, but only one in four (26 per cent) are willing to do so. Lithuania is among the EU countries where residents are the least likely to report corruption when faced with it<sup>49</sup>.

The main reason why people do not report corruption remains unchanged: the belief that it is difficult to prove anything<sup>50</sup>. The second most common reason is the growing concern that whistleblowers are not adequately protected<sup>51</sup>. In addition, there is still a widespread perception that reporting have no effect, as perpetrators would not be punished<sup>52</sup>.

The anti-corruption potential of civil servants is higher than that of other surveyed groups; however, signs of its decline have been observed. Although 71 per cent of civil servants know where to report corruption, the willingness to do so has decreased to 50 per cent<sup>53</sup>. Moreover, there has been a 15 per cent increase in the number of civil servants who indicated they would not report corruption due to fear of repercussions<sup>54</sup>: 78 per cent are afraid of workplace pressure and 64 per cent fear losing their job.

<sup>49</sup> According to the 2024 study, 5 per cent of individuals who encountered corruption reported it to the relevant authorities, while the EU average stood at 18 per cent. Lithuania's figure has not changed over the year. Data from the study *Special Eurobarometer 548: Citizens' attitudes towards corruption in the EU in 2024*. Available online: <https://europa.eu/eurobarometer/surveys/detail/3217>

<sup>50</sup> In 2024 – 46 per cent, which is 4 percentage points more than in 2023. Data from the study *Special Eurobarometer 548: Citizens' attitudes towards corruption in the EU in 2024*. *Ibid.*

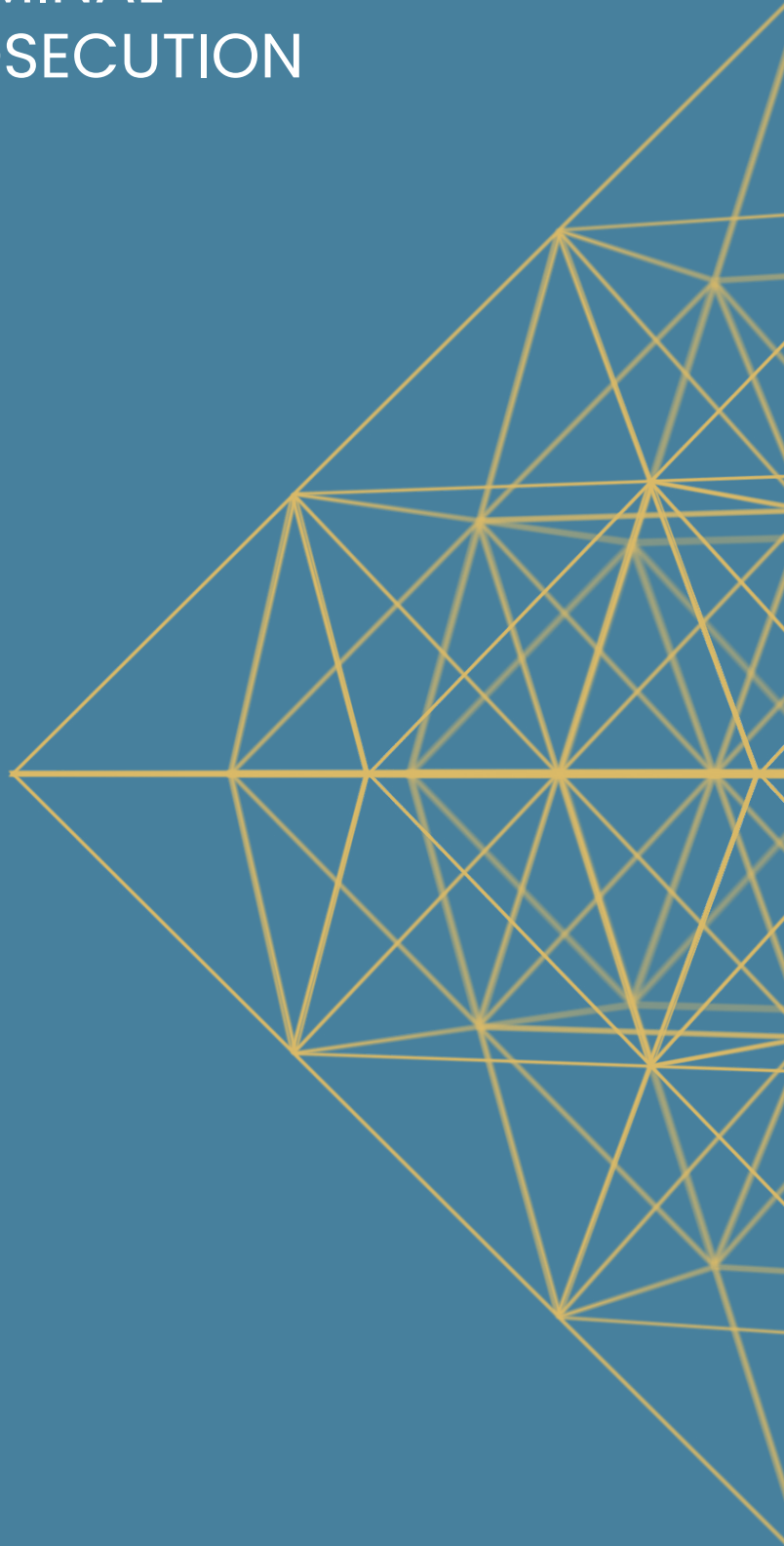
<sup>51</sup> In 2024 – 38 per cent, which is 4 percentage points more than in 2023. Data from the study *Special Eurobarometer 548: Citizens' attitudes towards corruption in the EU in 2024*. *Ibid.*

<sup>52</sup> In 2024 – 37 per cent, in 2023 – 40 per cent. Data from the study *Special Eurobarometer 548: Public Opinion on Corruption in the EU 2024*. *Ibid.*

<sup>53</sup> In 2023–2024, the indicator decreased by 16 percentage points compared to 2022. Data from the study *Map of Corruption in Lithuania 2023–2024*. Available online: <https://www.stt.lt/analitine-antikorpucine-zvalgyba/lietuvos-korupcijos-zemelapis/7437>

<sup>54</sup> In 2023–2024 – 44 per cent, in 2022 – 29 per cent. Data from the study *Map of Corruption in Lithuania 2023–2024*. *Ibid.*

|||. | CRIMINAL  
PROSECUTION



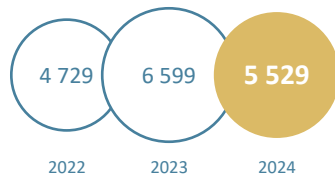
CRIMINAL PROSECUTION

Criminal prosecution contributes to public security and the implementation of the principles of the rule of law, while also strengthening public trust in the legal system. The criminal prosecution activities carried out by the Service are focused on the identification and investigation of systemic corruption-related criminal offences that cause the greatest harm to the State.

REPORTS SUBMITTED BY INDIVIDUALS

In 2024, the STT received 5 529 reports, which is in line with the average number of reports received over the previous two years: 4 729 in 2022 and 6 599 in 2023. Notably, based on the reports received in 2024, more pre-trial investigations were initiated – 72 in total, compared to 44 pre-trial investigations launched in 2023 on the basis of 6 599 reports.

Reports received

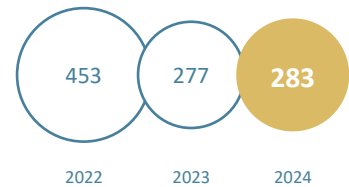


Most reports concerned suspected corruption-related criminal offences in the following areas: state governance, regional policy and public administration (including local government, political activities, and lobbying), environment, forestry and climate change, justice, public finance and official statistics, and healthcare. A comparison between the areas indicated in the reports and the areas of state activity to which the Service devotes greater attention reveals that they largely overlap. This indicates that the areas of state activity prioritised by the Service have not been selected at random.

PRE-TRIAL INVESTIGATIONS

The number of criminal offences identified remained similar to previous years – in 2024, a total of 283 criminal offences were identified and investigated followingly, 55 per cent of which were classified as serious or less serious crimes. Of all the offences identified, 81 per cent were related to areas of state activity to which the Service devoted increased attention in 2024: state governance, regional policy and public administration (including local government, as well as political party and campaign financing), environment, forestry, climate change, healthcare, national security, and defence.

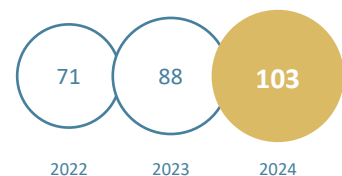
Criminal Offences Identified



The spectrum of criminal offences under investigation is highly diverse – ranging from cases of misuse of funds by municipal council members, which require meticulous examination of accounting documents, or relatively simple cases of so-called situational corruption (such as attempts by individuals to bribe examiners or inspectors), to the bribery of foreign officials in international business transactions or complex corruption schemes involving the misuse of European Union funds.

The number of pre-trial investigations remained relatively stable, with a slight increase – a total of 103 pre-trial investigations were initiated in 2024.

Pre-trial Investigations Initiated



The following pre-trial investigations are noteworthy

#### PRE-TRIAL INVESTIGATION INTO SUSPECTED CRIMINAL OFFENCES RELATED TO 'FOXPAY' SERVICE PROVISION

A pre-trial investigation has been launched into suspected criminal offences related to the provision of services by the technology company 'Foxpay' to public sector institutions. In this investigation, officers of the Special Investigation Service closely cooperated with the Financial Crime Investigation Service under the Ministry of the Interior of the Republic of Lithuania. This is a large-scale pre-trial investigation concerning possible money laundering of criminally acquired assets, other financial offences, and corruption involving 'Foxpay' and associated individuals.

#### PRE-TRIAL INVESTIGATION CONDUCTED IN COOPERATION WITH THE EUROPEAN PUBLIC PROSECUTOR'S OFFICE

One of the first pre-trial investigations carried out in cooperation with the European Public Prosecutor's Office (EPPO) has been completed and referred to court. It is suspected that an organised group of nine individuals attempted to fraudulently obtain EUR 200 000 in European Union structural support funds. Aware that the small partnership they represented did not meet the economic viability and income requirements set for legal entities eligible for financial support, the individuals allegedly forged documents between 2019 and 2022 and submitted them to state authorities and the National Paying Agency under the Ministry of Agriculture, which administers EU support, in an attempt to obtain funding. Charges in the case include forgery and use of forged documents, fraudulently obtaining targeted EU financial support, fraudulent accounting and organisation of fraudulent accounting, abuse of office, and embezzlement of assets.

#### PRE-TRIAL INVESTIGATION INTO AN ATTEMPT TO BRIBE AN ENVIRONMENTAL PROTECTION OFFICER

A successful pre-trial investigation was completed within three months regarding an attempt to bribe an employee of the Environmental Protection Department, who was assessing the damage caused by the widely publicised Paneriai fire<sup>1</sup>. According to the data collected during the pre-trial investigation, a company representative attempted to bribe the Environmental Protection Department employee in order to influence the calculation of environmental damage in favour of the company, during the assessment process following the fire that broke out on Panerių Street in Vilnius. The representative was detained after handing over part of the bribe. The pre-trial investigation was initiated in May 2024 following a report submitted by the Environmental Protection Department. A criminal order issued by the court in July 2024 came into force in October 2024.

#### PRE-TRIAL INVESTIGATION INTO SYSTEMIC CORRUPTION WITHIN LAW ENFORCEMENT

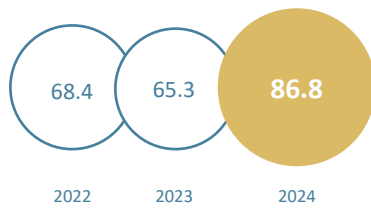
The pre-trial investigation into systemic corruption within law enforcement has been completed and referred to court. The investigation concerned the laundering of criminally acquired assets, bribery, trading in influence, active bribery, and abuse of office with the aim of obtaining confidential pre-trial investigation data and influencing procedural decisions. Seven individuals have been charged with corruption-related offences, including former prosecutors, a former chief investigator of the Financial Crime Investigation Service under the Ministry of the Interior of the Republic of Lithuania, practising attorneys, and private individuals.

<sup>1</sup> Available online: [https://www.stt.lt/naujienos/7464/\\_2024-5/tiriamas-atvejis-del-galimo-bandymo-papirkti-darbuotojavertinusi-zala-po-gaisro-paneriu-gatveje:3797](https://www.stt.lt/naujienos/7464/_2024-5/tiriamas-atvejis-del-galimo-bandymo-papirkti-darbuotojavertinusi-zala-po-gaisro-paneriu-gatveje:3797)

## COURT DECISIONS

In cases where the pre-trial investigation was conducted by the STT, 86.8 per cent of individuals were convicted by first-instance courts in 2024 – an exceptionally high rate compared to previous years (68.4 per cent in 2022 and 65.3 per cent in 2023).

Conviction Rate, per cent



In 2024, acquittals accounted for 10.6 per cent. On one hand, this figure is significantly lower compared to previous years. On the other hand, over a longer period, the acquittal rate in cases where the pre-trial investigation was conducted by the STT remains somewhat higher than the average acquittal rate in corruption-related cases and relatively high compared to the overall national acquittal rate, which typically stands at around 1–2 per cent. This trend – a growing conviction rate and a declining number of

acquittals – reflects the high quality of the pre-trial investigations conducted. It should be noted that in STT-initiated cases, the reasons for acquittal are predominantly not related to the establishment of factual circumstances or procedural errors by officers, but rather to differences in the legal assessment of the established facts. Therefore, it is recommended to continue and expand initiatives aimed at fostering uniform legal interpretation and improving mutual understanding between law enforcement institutions and the judiciary.

In 2024, court decisions resulted in fines amounting to EUR 1.9 million. It should be noted that in 2023, the total amount of fines was largely influenced by a single case in which a fine of EUR 1.85 million was imposed. The highest amount awarded in favour of the State in a single case reached EUR 5.2 million.

**EUR 1.9 million** – total amount of fines imposed by court decisions in cases investigated by the STT

**EUR 5.2 million** – the highest amount awarded in favour of the State in a single case

### Key Court Decisions in Cases Investigated by the STT

#### FORMER DIRECTOR OF THE NATIONAL FOOD AND VETERINARY RISK ASSESSMENT INSTITUTE FOUND GUILTY

In 2024, a case concerning criminal offences committed by the Director of the National Food and Veterinary Risk Assessment Institute was referred to and examined by the court. While also acting as Chair of the Pre-commer-

cial Procurement Commission, the Director initiated the unlawful absorption of EU funds during the implementation of a procurement process valued at EUR 874 000, despite knowing that launching such a pre-commercial procurement was unjustified, as an equivalent product was already available on the market. The total value of bribes received, illicit enrichment, and money laundering of criminal proceeds amounted to EUR 297 000.

## COURT DECISIONS IN EPISODES OF THE SO-CALLED JUDICIAL CORRUPTION CASE

Decisions of the Supreme Court of Lithuania (LAT) in Key Episodes of the So-Called Judicial Corruption Case Launched in 2018:

- 2024-04-24 ruling in a case in which a Vilnius lawyer was found guilty of trading in influence. The court rejected the convict's cassation appeal and upheld the decision of the first instance court, which imposed a fine of EUR 40 000 on him. It was established that this lawyer, using his professional position and connections, sought to illegally influence court decisions in exchange for financial gain. These actions are qualified as trading in influence – a crime when a person who has influence over government institutions or officials influences their decisions for a reward. Such crimes are particularly dangerous because they destroy the foundations of justice and promote the spread of corruption. This case received wide coverage in society and the media.
- 2024-05-14 ruling in the case of former Lithuanian Court of Appeal judge Valdimaras Bavėjanas. The LAT found that V. Bavėjanas, while serving as a judge, abused his official position in order to help his long-time friend, whose criminal case was being heard at the Court of Appeal. During the investigation, it was established that V. Bavėjanas discussed with this person and his defense attorney the possibilities of influencing the court's decision in order to obtain a lighter sentence. In addition, they considered the possibility of bribing the chairman of the court department so that the case would be assigned to the desired judge. The LAT assessed these actions as criminal abuse, which caused significant damage to the judicial system and the state, undermining trust in the justice system. For this, V. Bavėjanas was fined 12 thousand euros. This case attracted great public attention due to the judge's partici-

pation in corrupt activities and abuse of official position in order to influence court decisions for personal purposes. Legal experts note that this case could have a long-term impact on the transparency of the judicial system and tighten ethical standards for judges in the future.

## RULING IN THE POLITICAL CORRUPTION CASE, ALSO KNOWN AS THE "MG BALTIC" CASE

Ruling of 24 October 2024 by the LAT in the Political Corruption Case, also known as the "MG Baltic" Case. This case, launched in 2016, exposed close ties between business and politics and, upon its resolution, led to the formulation of the first comprehensive legal definition of political corruption in Lithuanian case law. It was established that the business group MG Baltic (now MG Group), through its Vice-President Raimondas Kurlianskis, provided financial support to political parties and their members in exchange for favourable political decisions. The main defendants—former Liberal Movement leader Eligijus Masiulis, Labour Party representative Vytautas Gapšys, and other politicians—were charged with bribery, trading in influence, abuse of office, and illicit enrichment.

The LAT examined 12 cassation appeals and largely upheld the appellate court's guilty verdict, maintaining most of the prior decisions. Raimondas Kurlianskis was found guilty of bribery and trading in influence and sentenced to 5 years and 6 months of imprisonment along with a fine of EUR 16 947. Eligijus Masiulis was convicted of bribery, trading in influence, and illicit enrichment. He was sentenced to 5 years and 6 months of imprisonment, with EUR 241 490 confiscated. Vytautas Gapšys was found guilty of trading in influence and bribery and sentenced to 3 years of imprisonment.

Financial penalties were also imposed on political parties: Liberal Movement – EUR 374 717, Labour Party – EUR 301 280, “MG Group” – approximately EUR 1.11 million.

This case attracted significant public and media attention, as it revealed systemic political corruption at the highest levels of government. The LAT’s ruling in the “MG Baltic” case marks an important milestone in Lithuania’s fight against political corruption. The imposition of strict penalties, including actual prison sentences (still relatively rare in corruption cases until now) and substantial fines, reflects the judiciary’s resolve to confront opaque interactions between business and politics and to strengthen democratic values and public trust in state institutions.

#### COURT DECISION ON ATTEMPT TO ILLEGALLY OBTAIN A VISA

Ruling by the LAT in a case involving a Russian citizen’s attempt to obtain a National Multiple-Entry Visa through bribery. The case is significant due to the uncovering of a trading in influence scheme during the investigation, which may negatively affect not only the transparency of the public sector but also national security. In this case, a bribe was offered to secure national multiple-entry visas for a Russian Federation citizen and their family member. The attempt was made to influence not only intermediaries, but also a high-ranking official—namely, the Ambassador of the Republic of Lithuania to Russia—to facilitate the issuance of visas to individuals who would not have been legally eligible to receive them. This case demonstrates that corruption poses a direct threat to national security, as efforts were made to enable entry into the country by persons whose arrival the state seeks to prevent.

#### COURT DECISION ON ENVIRONMENTAL DAMAGE TO THE CURONIAN SPIT

The decision of the Lithuanian Court of Appeal in the Curonian Spit case is significant due to the record-setting award of EUR 5.2 million in environmental damages. In this case, a company, its director, and deputy director were found guilty of causing major damage to land (its surface) and of degrading a protected area in the Curonian Spit National Park by dumping construction waste on forest roads and soil. Between May and September 2020, while acting in their official capacities at the company, the individuals violated environmental protection regulations by instructing employees to transport and dump milled asphalt waste. According to environmental legislation, such waste should have been delivered to a certified recycling facility. The investigation revealed that construction waste was dumped in three separate locations, including forest tracks, contaminating more than 3 000 square metres of land. This caused long-term environmental harm. Expert assessments confirmed that the environmental damage exceeded EUR 5 million.<sup>2</sup>

#### COURT DECISION ON CRIMINAL OFFENCES COMMITTED BY THE FORMER DIRECTOR OF KAUNAS CITY MUNICIPALITY ADMINISTRATION

On 28 February 2024, the Lithuanian Court of Appeal delivered a judgment in the case of Vilius Šiliauskas, former Director of Kaunas City Municipality Administration, and imposed a stricter sentence for bribery. V. Šiliauskas was found guilty of having demanded and accepted a bribe of EUR 260 000—one of the largest bribes in the history of independent Lithuania—from Juozas Kriaučiūnas, head of the construction company “Autokausta”, in exchange for favourable decisions benefiting the company, during his term in office between 2021 and 2022. The Court ruled that

<sup>2</sup> The court judgement has entered into force but has been appealed by way of cassation and may still change.

the EUR 65 000 fine imposed by the court of first instance had been disproportionately lenient and did not reflect the seriousness and scale of the offence. The appellate court sentenced V. Šiliauskas to 3 years and 4 months of actual imprisonment and imposed a 7-year ban on holding public office. In addition, EUR 240 930 in cash seized during the search was confiscated, and a further EUR 19 070 was ordered to be recovered. The case drew significant public attention due to the exceptionally large amount of the bribe and the senior position held by the accused. The Court of Appeal's ruling sends a clear message that even high-ranking public officials are not immune from accountability for corruption-related offences.<sup>3</sup>

### CASES CONCERNING THE MISUSE OF MUNICIPAL COUNCIL MEMBERS' EXPENSE FUNDS

In 2024, a total of 55 individuals were formally charged in relation to the misuse of municipal funds allocated to municipal council members. During the same year, 29 cases were referred to court. First-instance court rulings were delivered in 8 cases, and all 8 rulings entered into force.

The court-referred cases were concluded either by criminal orders or guilty verdicts.

Although the classification of criminal offences varies slightly depending on the specific circumstances of the offence and the expense reimbursement procedures in place in each municipality, the dominant charges fall under the following articles of the Criminal Code: Article 182 (Fraud), Article 183 (Embezzlement), Article 228 (Abuse of Office) and Article 300 (Forgery or Use of Forged Documents).

The fines imposed by courts ranged from EUR 5 000 to EUR 25 000, with an average fine exceeding EUR 10 000. The total amount of fines imposed in 2024 reached EUR 198 500. The most commonly applied criminal sanction was a prohibition on being appointed or elected to certain public positions. In addition, courts awarded compensation for damages ranging from EUR 1 500 to EUR 10 000 per case. The average amount of damages awarded was EUR 3 600, with a total of EUR 17 965 awarded across all court decisions. Furthermore, in the cases referred to court, a total of EUR 110 900 in damages was voluntarily repaid during the pre-trial investigation stage.

As of the end of 2024, the STT was conducting pre-trial investigations into suspected misuse of council funds in 33 municipalities. The total number of individuals under investigation in these cases was approximately 400. These investigations are expected to constitute a significant share of the workload for the STT's criminal prosecution units in 2025. In addition, the STT continues to cooperate with municipal audit and internal control services in municipalities where no pre-trial investigations have been initiated, receiving and reviewing audit reports.

### MEASURES AIMED AT IMPROVING THE QUALITY OF CRIMINAL PROSECUTION

With the objective of achieving qualitative advancements in the criminal prosecution activities carried out by the Service—ensuring consistent long-term development aligned with the priorities set out in the STT Strategic Development Guidelines for 2024–2028—several important initiatives were implemented in 2024, in addition to ongoing pre-trial and/or criminal intelligence investigations:

<sup>3</sup> The court judgement has entered into force but has been appealed by way of cassation and may still change.

## CRIMINAL PROSECUTION

- As part of the project “Prevention and Detection of Corruption, Including Bribery in International Business Transactions” (VSF/2023/331), seminars were organised in Vilnius and Klaipėda for Lithuanian law enforcement officials. These events featured experts from the United States and other countries and focused on foreign official bribery in international business transactions.
- A service contract was signed with the Basel Institute on Governance, which committed to develop and deliver a five-day tailored training programme on Financial Investigation and Asset Recovery for 35 representatives from Lithuanian law enforcement agencies. Preparatory work was carried out in 2024, including an expert mission to Lithuania, meetings with institutions responsible for asset recovery, an assessment of the current national system, and submission of a mission report. This report now serves as the basis for training materials and the agenda for the training, scheduled for March 2025.
- An STT officer was appointed as the National Expert to the European Public Prosecutor’s Office (EPPO) for a two-year term. The delegated officer provides legal and operational support to EPPO’s criminal prosecution activities, as well as legal opinions and consultations to the European Chief Prosecutor, European Prosecutors, and Permanent Chambers. The officer also supports the operational and investigative work of European Delegated Prosecutors and maintains liaison with national authorities.
- In order to promote consistency in judicial practice, improve mutual understanding among pre-trial investigation bodies, the prosecution service and the judiciary, and to strengthen inter-institutional cooperation, various forms of expert discussions were initiated. One such example was a practical discussion held at the National Courts Administration and co-organised by the Supreme Court of Lithuania, the National Courts Administration, and the STT. The event was entitled “The Standard for Investigating Corruption Cases: What Should It Be to Ensure Accountability for Illegal Conduct?”



III. | CORRUPTION  
PREVENTION

Corruption prevention aims to achieve fundamental changes in reducing corruption at the national level and to support the consistent and comprehensive development of a sustainable anti-corruption ecosystem. The corruption risk analyses and anti-corruption assessments of legislation and draft legal acts conducted by the Service make a significant contribution to identifying and managing corruption risks and risk factors embedded in legal regulation and in the activities of public sector entities. Furthermore, the methodological assistance provided by the Service supports the creation of a corruption-resilient environment—one of the strategic goals of the National Anti-Corruption Agenda for 2022–2033.

## IMPLEMENTATION OF THE NATIONAL ANTI-CORRUPTION AGENDA FOR 2022–2033

*A monitoring report<sup>1</sup> on the implementation of the National Anti-Corruption Agenda for 2022–2033 (the Agenda) for the year 2023 was prepared, and the methodology for monitoring and evaluating the progress of the Agenda’s implementation was approved<sup>2</sup>*

As the coordinator<sup>3</sup> of the National Anti-Corruption Agenda for 2022–2033 (the Agenda), the Service is responsible for monitoring and evaluating the progress of its implementation<sup>4</sup>.

<sup>1</sup> Available online: <https://stt.lt/korupcijos-prevencija/national-agenda-on-corruption-prevention/7744>; [https://stt.lt/data/public/uploads/2024/07/nkpd-pazyma\\_2024-07-19\\_2.pdf](https://stt.lt/data/public/uploads/2024/07/nkpd-pazyma_2024-07-19_2.pdf)

<sup>2</sup> Available online: <https://e-tar.lt/portal/en/legalAct/9be0e680346a11efbdaca558de59136c>

<sup>3</sup> Available online: <https://e-tar.lt/portal/en/legalAct/477f7bc0eb0e11ed9978886e85107ab2>

<sup>4</sup> Available online: <https://www.stt.lt/data/public/uploads/2024/06/ndkpk-stebesenos-ataskaita-2024>; <https://stt.lt/korupcijos-prevencija/national-agenda-on-corruption-prevention/7744>; [https://stt.lt/data/public/uploads/2024/07/nkpd-pazyma\\_2024-07-19\\_2.pdf](https://stt.lt/data/public/uploads/2024/07/nkpd-pazyma_2024-07-19_2.pdf)

Progress in implementing the Agenda’s action plan is being tracked, and the following aspects are positively assessed:

- In the first year of implementation, 74 per cent of the measures under the 2023–2025 Agenda Action Plan were launched, and their implementation is being monitored.
- Some implementing institutions have initiated certain measures in advance, even though the implementation and achievement of their indicators were originally planned for later years.

The Agenda’s implementation monitoring report provides an overview of the progress made in implementing the action plan measures and includes recommendations for responsible implementing bodies and decision-makers on how to improve the effectiveness of implementation.

Progress is assessed in accordance with the approved Monitoring and Evaluation Methodology, which defines and explains to all relevant stakeholders (implementing institutions, and others involved in the monitoring and evaluation process) the steps undertaken by the Service in preparing progress reports on Agenda implementation.

As the first implementation phase of the Agenda (2023–2025 Action Plan) approaches its end, the next stage becomes a key priority for 2025: the drafting of the Action Plan for the 2026–2029 period. The objective is to include ambitious, impactful, and change-driving anti-corruption measures. The implementation of the Agenda contributes to the state’s overall progress in anti-corruption policy. Therefore, the active involvement of responsible institutions and the high quality of the new Action Plan’s preparation are of particular importance.

## IMPLEMENTATION OF THE LAW ON THE PREVENTION OF CORRUPTION OF THE REPUBLIC OF LITHUANIA AND THE DEVELOPMENT OF A CORRUPTION-RESILIENT ENVIRONMENT

*The Guidelines for Building a Corruption-Resilient Environment in the Public Sector were updated and presented to public sector institutions<sup>5</sup>*

The Service, providing methodological assistance to public sector entities in creating a corruption-resistant environment, has updated the Guidelines for Creating Anti-Corruption Environment for Public Sector. These guidelines are an auxiliary, practical methodological tool, in which one can find answers to questions arising in creating a corruption-resistant environment, the role of various entities, the content and objectives of the measures applied, self-assess the most common mistakes and other practices related to the implementation of corruption prevention measures. The guidelines have been prepared taking into account the latest version of the Law on the Prevention of Corruption of the Republic of Lithuania, relevant questions received by the STT when providing methodological assistance.

*Strengthening the anti-corruption potential of municipalities*

The Service, among other methodological assistance events for the public sector, organized 3 practical methodological assistance events aimed at strengthening the competencies of entities responsible for creating a corruption-resistant environment in municipalities. In 2024, attention was paid to relevant issues related to the implementation of the Law on

the Prevention of Corruption and practical training to strengthen the competencies of identifying corruption risks. These events were attended by representatives from 49 municipalities responsible for creating a corruption-resistant environment.

*Insufficient involvement and leadership of managers in managing corruption risks and creating a corruption-resistant environment*

Without sufficient attention at the state level to the management of corruption risks in public sector entities and the strengthening of internal control procedures, heads of public sector entities pay little attention to the management of risks that may arise in their activities and the mechanisms for their prevention. In the absence of a comprehensive approach to the overall risk management, attention is not always paid to the obligation to manage all risks (including corruption) that may arise in the activities of a public sector entity, and the responsibility of high level management managers in this process. For these reasons, often only an appointed prevention specialist is responsible for the implementation of the Law on the Prevention of Corruption in an institution, or a formal approach is taken, limiting itself to approving documents without identifying relevant risks and selecting appropriate measures to eliminate them.

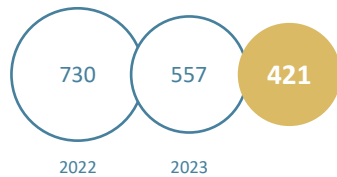
<sup>5</sup> Available online: [https://stt.lt/naujienos/7464/\\_2024/presented-new-guidelines-for-creating-a-corruption-resilient-environment-in-the-public-sector-practical-examples-and-effective-corruption-prevention:3863](https://stt.lt/naujienos/7464/_2024/presented-new-guidelines-for-creating-a-corruption-resilient-environment-in-the-public-sector-practical-examples-and-effective-corruption-prevention:3863)

CORRUPTION PREVENTION

DETERMINATION OF CORRUPTION RISK FACTORS WHEN PERFORMING CORRUPTION RISK ANALYSES AND ANTI-CORRUPTION ASSESSMENTS OF LEGISLATIVE ACTS OR THEIR DRAFTS

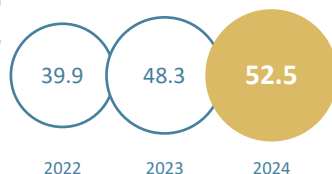
Focusing on the significance of corruption risk factors led to an increasing share of critical anti-corruption comments submitted regarding corruption risk factors that could cause the greatest threat and damage, and at the same time a general decrease in the number of comments submitted. The average number of critical anti-corruption comments in 2024 increased to 52.5 per cent. In total, 421 comments were submitted in the conclusions on corruption risk analyses and anti-corruption assessment of legal acts or their drafts in 2024.

Comments provided on the identified corruption risk factors



The interactive activities of the Service’s units enable these corruption prevention measures to be applied in those areas where corruption risk factors that can cause the greatest damage to the state exist. When conducting corruption risk analyses, anti-corruption assessments of legal acts or their drafts, the information available from analytical anti-corruption intelligence, report processing and/or criminal prosecution units is used. In some cases, both corruption risk analyses and anti-corruption assessments of legal acts or

Average number of critical anti-corruption comments regarding corruption risk factors that directly create or may create conditions for corruption, in percentages



their drafts were carried out in the same areas of state activity, which allowed for a more accurate and detailed identification of corruption risk factors.

Anti-corruption assessments of legal acts or their drafts and conclusions on corruption risk analyses are noteworthy

ANTI-CORRUPTION ASSESSMENT OF LEGISLATION AND CORRUPTION RISK ANALYSIS IN THE ACTIVITIES OF THE STATE HOSPITAL FUND

In response to negative information that appeared in the public domain, the Special Investigation Service conducted a systemic assessment of corruption risks in the activities of the National Health Insurance Fund (VLK) and the Territorial Health Insurance Funds (TLK). Following an anti-corruption assessment of relevant legislation and a corruption risk analysis, it was established that the existing legal framework does not provide effective mechanisms to verify whether healthcare services billed to TLK were actually delivered to patients. This legislative gap creates conditions for healthcare providers to submit potentially fictitious data to TLK. It was also found that VLK and TLK control specialists, upon detecting the unlawful use of resources from the Compulsory Health Insurance Fund, do not consistently apply administrative liability and often fail to impose fines or issue warnings. Although damage to the state budget amounting to EUR 0.6 million was identified through control procedures in 2023, the amount of fines imposed accounted for less than 1 per cent of the total identified damage. This practice is partly influenced by the mild financial penalties set out in the Code of Administrative Offences, which fail to act as a deterrent. Additional weaknesses were identified in the areas of oversight procedures, staff rotation, risk assessment of healthcare institutions, and contractual arrangements with service providers. Regarding the reimbursement system for medicinal products and medical devices, it was established that suppliers of medical devices are not required to substantiate the proposed reimbursement price with objective data, and officials responsible for overseeing the process do

not verify the accuracy of the submitted pricing information. For example, a medical device acquired abroad for a few euros may be sold in Lithuania for several hundred euros—with the inflated price reimbursed by the state. Moreover, through analytical anti-corruption intelligence, the STT identified instances where commission members were involved in decision-making on reimbursement for medical devices or pharmaceuticals while having direct or indirect ties (through related persons) to the financial beneficiaries of such decisions. The identified corruption risks may lead to the misuse of the Compulsory Health Insurance Fund budget, which is expected to reach EUR 4 billion in 2025.

#### ANTI-CORRUPTION ASSESSMENT OF LEGISLATION AND CORRUPTION RISK ANALYSIS IN THE ALLOCATION PROCESSES OF MUNICIPAL ROAD MAINTENANCE AND DEVELOPMENT PROGRAMME FUNDS

Taking into account the need for funds required for the construction, management and maintenance of roads in the state and the resulting necessity to use the funds as transparently and efficiently as possible, the STT conducted an anti-corruption assessment of legal acts and a corruption risk analysis of the processes of distributing funds for the Road Maintenance and Development Programme (KPPP) in municipalities. The following corruption risk factors were identified: insufficiently clear and consistent regulation of the compilation, updating and amendment of lists of objects to be financed, the set of criteria for the selection of objects does not ensure the objectivity of the selection of objects, and the legal regulation established by municipalities sometimes does not coincide with the practice formed by them, not all municipalities adhere to the principles and proportions of the distribution of funds established in the KPPP Financing Law. In addition, the competences of municipal councils in making decisions on the use of KPPP funds are not sufficiently clear, sufficient regulation of the formation of commissions carrying out the selection of objects is not established, and the competences of municipal elders in the process of distributing KPPP funds are not sufficiently clear. In addition, the regulation of work supervision does not ensure the resistance of procedures to corruption, in principle there is

no external control and/or supervision of this process. Proposals for the elimination of the identified corruption risk factors have been submitted to the Ministry of Transport and Communications, AB Via Lietuva and the analysed municipalities.

#### CORRUPTION RISK ANALYSIS IN THE PROCESSES OF DETERMINING OR CHANGING THE PRIMARY PURPOSE AND/OR METHOD OF LAND USE

Following a corruption risk analysis conducted by the Service on the processes of determining or changing the primary land use purpose and/or method, it was established that due to regulatory gaps, the resulting preconditions for manipulating sector-specific terminology allow municipalities to interpret the same situation differently and make inconsistent decisions under identical circumstances. It was also found that in some municipalities, inconsistent and selective practices were applied, where repeated applications could be approved even though initial applications had been rejected, and in some cases, applications were approved despite not meeting the established requirements, or applicants were asked to provide documents not stipulated by the regulations. It is observed that due to the lack of process clarity, landowners may not understand when their rights are being violated and therefore may not seek redress for such violations. In addition, the fines imposed on institutions for procedural and deadline violations are not proportionate.

#### ANTI-CORRUPTION ASSESSMENT CONCLUSION ON THE LEGAL REGULATION PROVISIONS FOR ELECTRICITY ACCOUNTING

Following the anti-corruption assessment of the legal act, it was established that electricity consumers are not guaranteed the ability to monitor their electricity consumption in real time. As a result, network operators may, at their discretion, submit data that does not correspond to the actual amount of electricity consumed by the user. For this reason, the amount of electricity recorded by electricity metering devices may differ from the amount of electricity billed to the consumer.

## CORRUPTION PREVENTION

Corrective decisions addressing the identified corruption risk factors outlined in these conclusions were adopted in an exceptionally prompt manner

#### ANTI-CORRUPTION ASSESSMENT CONCLUSION ON THE DRAFT LAW AMENDING THE LAW ON COMPETITION AND THE LAW ON ASSOCIATIONS

Following the anti-corruption assessment of the Draft Law Amending the Law on Competition (No. XIVP-2887(2)) and the Draft Law Amending the Law on Associations (No. XIVP-3309), it was established that the proposed amendments would create preferential conditions for one specific category of legal entities—associations and/or their members—to avoid the application of the Law on Competition. Although the Draft Law Amending the Law on Associations (No. XIVP-3309) had been included in the agenda of the Seimas, the member of parliament who initiated the draft submitted a request to withdraw the item from the agenda prior to its approval. Taking into account the comments provided by the Special Investigation Service, the deliberation of the draft law—identified as requiring improvements from an anti-corruption perspective—was cancelled.

#### ANTI-CORRUPTION ASSESSMENT CONCLUSION ON THE LEGAL REGULATION OF THE SALE OF STATE AND MUNICIPAL PROPERTY THROUGH ELECTRONIC AUCTIONS

Following the anti-corruption assessment carried out by the Special Investigation Service on the legal regulation of the sale of state and municipal property through electronic auctions, it was found that in approximately 44 per cent of such auctions, there is no competition—state and municipal real estate is sold at the starting price with only one participant taking part. Although the Ministry of Finance agreed with the proposals submitted by the STT, in order to assess additional potential shortcomings in the legal regulation of the sale of state and municipal property through electronic auctions, a decision was made to carry out a corruption risk analysis in 2025.

#### COMPREHENSIVE ANTI-CORRUPTION ASSESSMENT CONCLUSION ON THE PROVISION OF SUPPORT BY STATE- AND MUNICIPALITY-OWNED ENTERPRISES

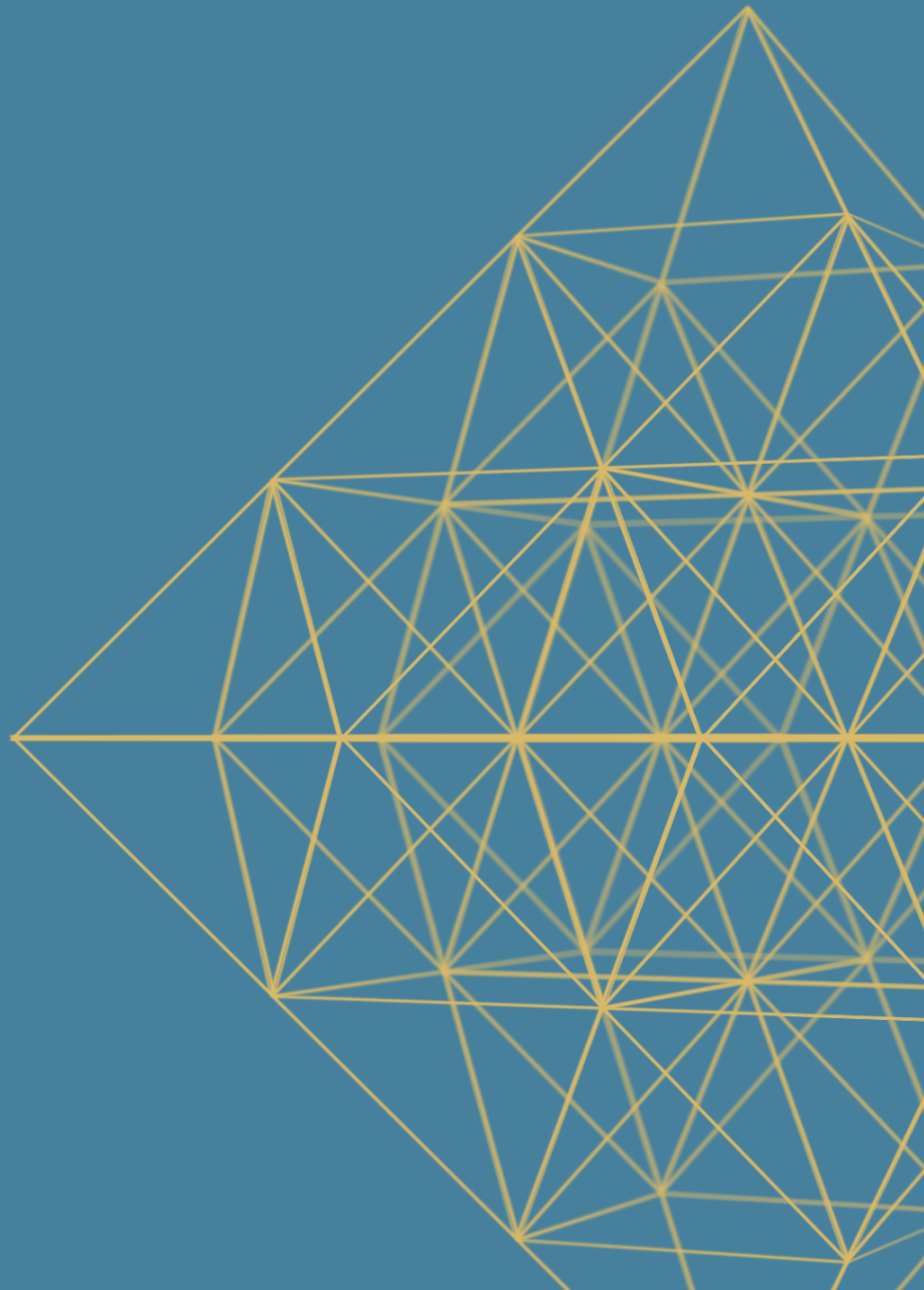
The Service conducted an anti-corruption assessment of the legal acts regulating the provision of support by 22 randomly selected state- and municipality-owned enterprises. It was established that, from an anti-corruption perspective, the legal regulation in some enterprises is flawed and fails to ensure the rational, justified, and transparent allocation and use of support. Some enterprises provided support in the absence of approved support provision rules, or under rules whose provisions did not align with the objectives and principles of support allocation. In several cases, there were no detailed application evaluation criteria or procedures for their review, and decisions on granting support were made unilaterally. In response to the comments provided by the STT, the majority of enterprises revised their internal procedures and eliminated the identified corruption risk factors.

#### IMPLEMENTATION OF THE RECOMMENDATIONS PROVIDED IN THE CONCLUSIONS OF CORRUPTION RISK ANALYSES IN THE CONSTRUCTION SECTOR

During the monitoring of the implementation of recommendations provided in the conclusions of corruption risk analyses, it was found that significant changes took place in the construction sector in 2024. Following the corruption risk analyses, amendments were initiated to restrict the possibility of constructing non-residential buildings (such as workshops or warehouses) when, in practice, their actual use is residential. The functionality of the “Infostatyba” information system was also improved, and the automatic approval feature was eliminated. As a result, building design projects will now undergo actual verification, ensuring compliance with established requirements. In addition, changes in regulation removed the obligation for the Construction Sector Development Agency to conclude contracts with contractors for document review. This change will reduce the administrative burden on the institution and ensure more consistent oversight and accountability of economic operators.

IV.

ANALYTICAL  
ANTI-CORRUPTION  
INTELLIGENCE



## ANALYTICAL ANTI-CORRUPTION INTELLIGENCE

Analytical anti-corruption intelligence focuses on collecting, processing, and cross-referencing information related to corruption and associated phenomena with other available public or classified data, with the aim of identifying risks and threats before they escalate into criminal offences. The information obtained through analytical anti-corruption intelligence is provided to state and municipal institutions and officials responsible for decision-making, in order to support data-driven decisions that reduce corruption, strengthen prevention efforts, mitigate or prevent the damage caused by corruption, and ensure the protection of national security interests.

### The Following Results of Analytical Anti-Corruption Intelligence Activities Are Noteworthy

#### IDENTIFIED POTENTIAL RISKS OF CORRUPTION AND CONFLICTS OF INTEREST BETWEEN PUBLIC AND PRIVATE SECTORS IN PUBLIC SECTOR ACTIVITIES

As part of inspections and in cooperation with 12 public sector entities, the relationships and connections among employees and officials of state institutions working in the fields of national security and defence, transport and communications, state governance, regional policy, public administration, environment, forestry, and climate change were assessed. Particular attention was given to potential risks related to participation in public procurement processes, as connections between contracting authorities and procurement winners may create conditions for conflicts of interest between public and private sectors and/or increase the risk of corruption.

Relationships that could have affected the transparency of institutional functions were analysed, and factors that increase the likelihood of such risks arising were identified.

In 2024, the Service analysed data from national registers and information systems, continuously comparing them with other information held by the Service. As a result of these analytical intelligence activities, 18 analytical reports were prepared and submitted to relevant institutions capable of making decisions in the field of corruption prevention, thereby strengthening transparency and public trust in the public sector.

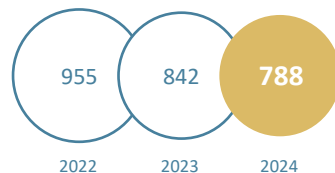
#### ASSESSMENT OF POTENTIAL CORRUPTION RISKS IN THE NATIONAL DEFENCE SYSTEM

In order to contribute to the assessment of threats and risk factors affecting the security of the national defence system of the Republic of Lithuania, an analysis was carried out of potential risks related to public procurement processes conducted within the national defence system, the receipt and provision of support, and interpersonal connections among individuals involved.

## IMPLEMENTATION OF THE LAW ON THE PROTECTION OF OBJECTS IMPORTANT FOR NATIONAL SECURITY

In order to protect the interests of the state in strategically important sectors of the economy related to national security, the Special Investigation Service actively contributes by conducting assessments of investors and transaction parties. In 2024, a total of 788 natural and legal persons seeking to invest or conclude transactions in the finance and credit, transport, energy, and defence industry sectors were assessed. The purpose of these assessments is to identify and prevent risk factors that may pose a threat to national security interests. During the assessments, a recurring trend was observed—attempts to manipulate hard-to-verify data in order to conceal actual links to hostile states. This highlights once again the importance of in-depth data analysis in strengthening the protection of objects important for national security.

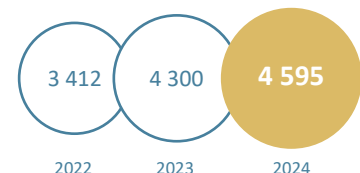
Natural and Legal Persons Assessed for Potential Risks and Threats to National Security in Strategically Important Economic Sectors



## PROVISION OF INFORMATION ON PERSONS IN ACCORDANCE WITH THE LAW ON THE PREVENTION OF CORRUPTION

In implementing the measure for creating a corruption-resilient environment as established in the Law on the Prevention of Corruption—namely, ensuring personnel reliability—the Service collects and provides information on individuals seeking to hold or currently holding positions to the head of the public sector entity responsible for appointing, nominating, or having appointed the individual. This information is provided to support well-founded and reasoned decisions regarding the appointment of individuals, the assignment of responsibilities, refusal to appoint, dismissal, or other personnel-related decisions within the public sector. In 2024, information related to managing personnel reliability risks was submitted to 675 public sector entities concerning 4 595 individuals.

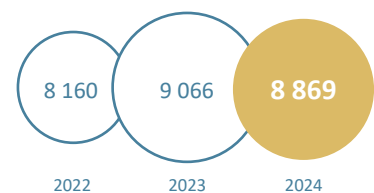
Information on Natural Persons Provided to Public Sector Entities for the Management of Personnel Reliability Risks



## PROVISION OF INFORMATION ON PERSONS IN ACCORDANCE WITH THE PROVISIONS OF THE LAWS ON STATE AND SERVICE SECRETS, BANKING, STATE AWARDS, AND OTHER LEGISLATION

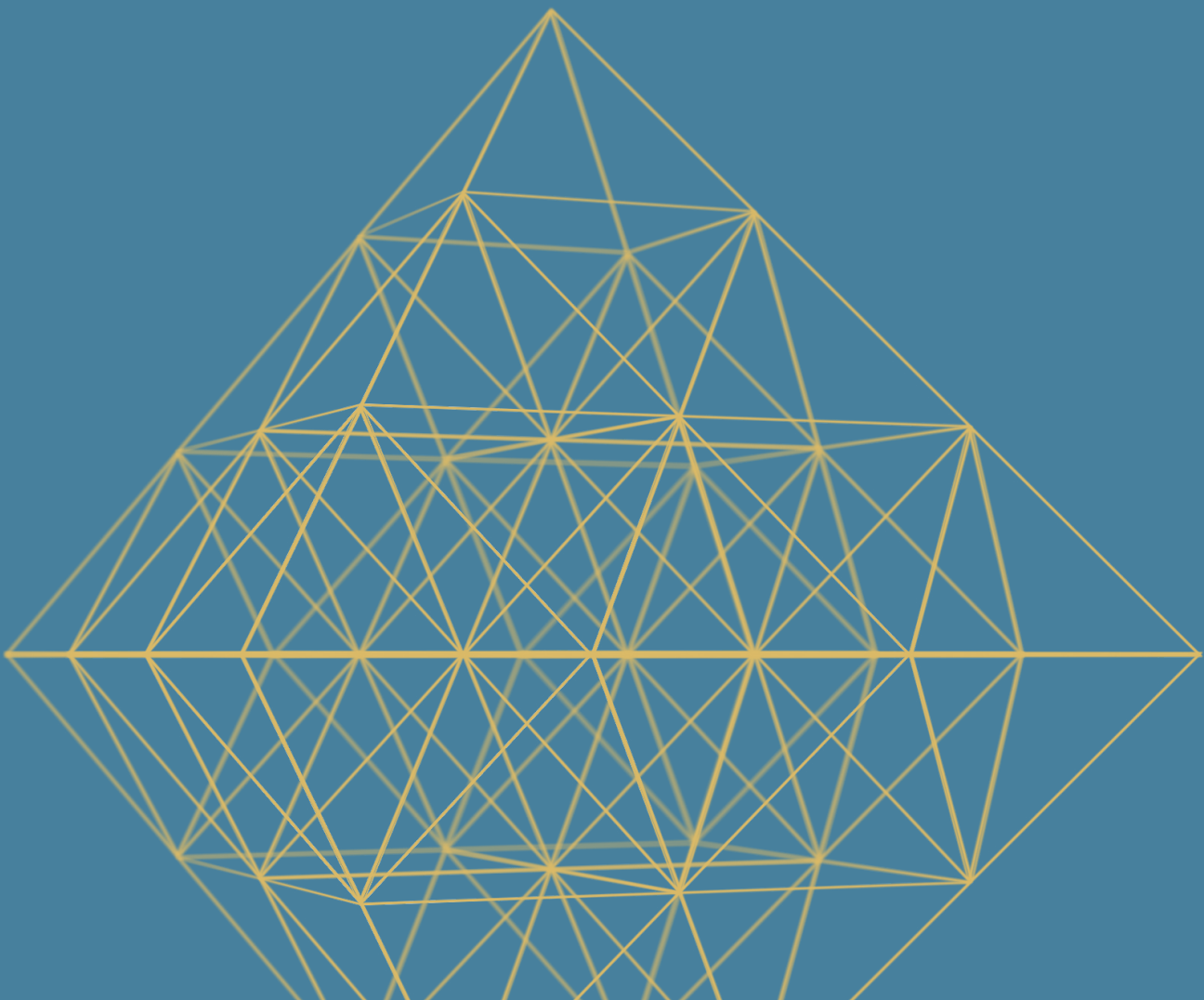
The Service, participating in the established verification processes of individuals while implementing the provisions of the State and Official Secrets, Banking, State Awards, Public Procurement and other legal acts, in 2024 verified and provided information about 8 869 natural and legal persons to different public sector entities in accordance with the procedure and scope established by legal acts.

Persons on Whom Information Was Provided on the Basis of the Laws on State and Service Secrets, Banking, State Awards, and Other Legislation



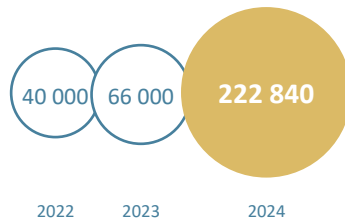
V.

RAISING  
ANTI-CORRUPTION  
AWARENESS

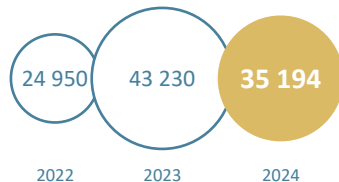


In order to increase anti-corruption awareness and develop anti-corruption attitudes in society, the Service promotes an honest and transparent approach to the processes taking place in the state, provides knowledge about the damage caused by corruption, involves more and more representatives of various fields in anti-corruption activities, and thus contributes to the creation of a more corruption-resistant environment.

Individuals reached by anti-corruption education initiatives

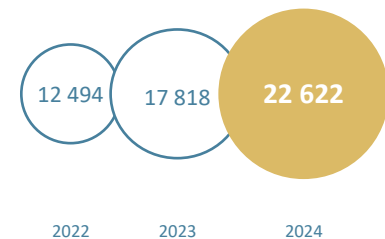


Certificates issued on the e-learning platform



In order to foster anti-corruption attitudes within society, a variety of awareness-raising measures are implemented, with their reach expanding each year. According to data from the STT, anti-corruption education initiatives reached approximately 223 000 people in 2024. A total of 22 600 individuals participated in traditional anti-corruption lectures, practical seminars, and other activities organized by the STT. Additionally, 35 000 certificates were issued to participants who completed training in the STT's virtual learning environment<sup>1</sup>.

Participants of Anti-Corruption Lectures, Classes, Practical Seminars, and Other Anti-Corruption Events



## "INTEGRITY ACADEMY" INITIATIVE – 4 YEARS

For four years, the "Integrity Academy" initiative has united Lithuania's transparency community—bringing together representatives from the public and private sectors—to share best practices, strengthen competencies, and build a corruption-resilient environment. As in previous years, on the occasion of International Anti-Corruption Day, the "Celebration of Integrity" took place at the Office of the President of the Republic of Lithuania on 9 December 2024. The event marked the fourth anniversary of the "Integrity Academy" initiative, during which the initiative's new strategic vision was presented, the most active mentors were recognised, and the winners of the student competition "Creating Integrity Together '24" were announced. More than 3 700

participants took part in events organised under the "Integrity Academy", an initiative launched by the President of the Republic of Lithuania and implemented jointly with the Special Investigation Service. Several events were dedicated to strengthening anti-corruption awareness among school students, specifically for teachers participating in the "Integrity Academy for Teachers" programme. Over 200 Lithuanian educators expressed interest in the programme, which enhances teachers' anti-corruption education competencies through mentorship and knowledge sharing. In 2024, participation was entirely voluntary. Throughout the year, seven best practice exchange events were held, featuring 30 presentations on opportunities for student anti-corruption education. More than 2 700 teachers from general education and vocational schools attended related seminars and training workshops.

<sup>1</sup> Available online: <https://emokymai.stt.lt/>

RAISING ANTI-CORRUPTION AWARENESS



Figure 1. Visual from the “Integrity Academy” educational material for teachers, titled “Gift-giving policy in schools: from theory to practice.”

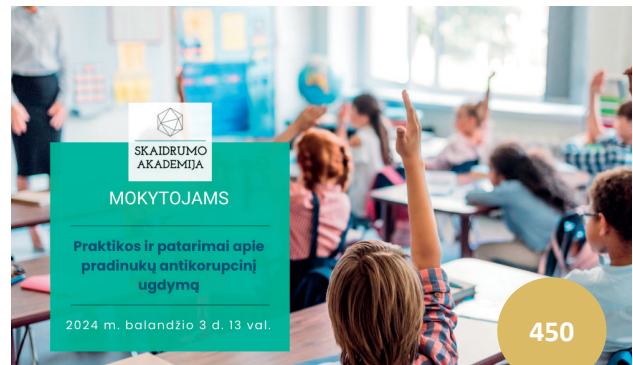


Figure 2. Announcement of a training event organized by the “Integrity Academy”: “Practical guidance on anti-corruption education for primary school students.”

The “Integrity Academy for Teachers” events attracted the highest number of participants.



Figure 3. Visual from the “Integrity Academy” initiative “For Teachers”, summarizing experiences and insights from the second year of activity.



Figure 4. Visual from the “Integrity Academy” initiative for teachers. The slogan asks: “What is young people’s attitude towards the problem of nepotism?”

The Following Anti-Corruption Awareness-Raising Activities Are Noteworthy

NATIONAL COMPETITION FOR PUPILS “CREATING INTEGRITY TOGETHER ‘24”

The national competition for pupils “Creating Integrity Together ‘24”, organized by the STT, attracted the participation of 305 general education classes. A total of 5 708 pupils from across Lithuania took part in the competition. Participants completed a test and created submissions on the topic “Integrity and Transparency Are More Important Than Connections and Favouritism.” The competition aims to promote civic engagement and foster anti-corruption values among students. Winners are honoured at the *Celebration of Integrity* event held at the Office of the President of the Republic of Lithuania.



Figure 5. Visual for the national student contest “CREATING INTEGRITY TOGETHER 24”, organized in cooperation with education and other institutions to promote integrity and anti-corruption awareness among youth.

## YOUTH-FOCUSED SOCIAL CAMPAIGN “A GENERATION THAT REACHES ITS GOALS ON ITS OWN”

In 2024, the Special Investigation Service launched the social campaign “A Generation That Reaches Its Goals on Its Own”, aimed at strengthening youth resilience to nepotism. The campaign’s objective was to highlight that real achievements are built on talent and hard work—not on connections. In the campaign video, well-known public figures invited young people to join the anti-corruption movement, say “no” to nepotism, and share their own success stories.

**Karta, kuri siekia  
tikslą pati** Prisijunk prie  
mūsų judėjimo!  
**#nepotizmuiNE**

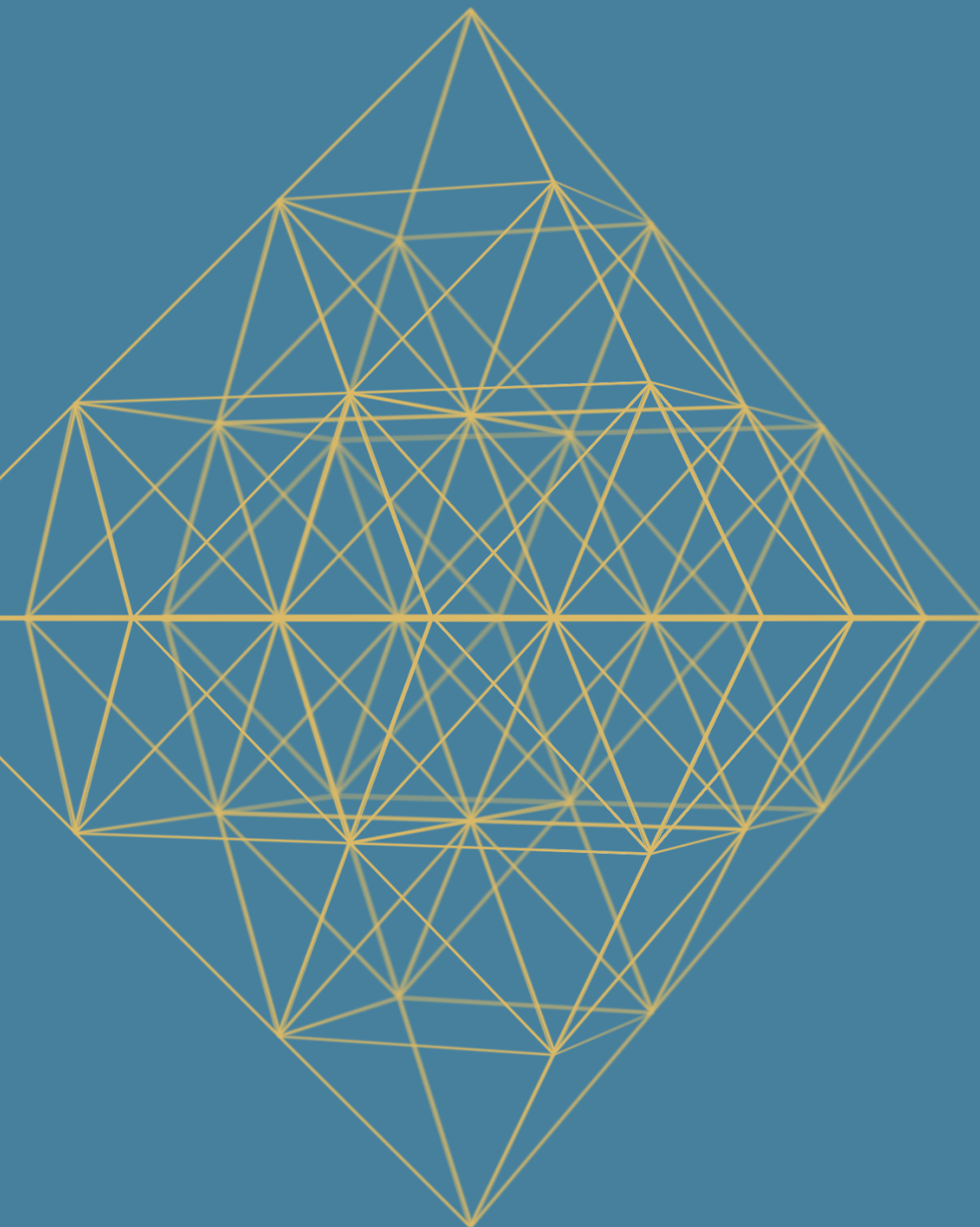


**Figure 6.** Social campaign visual with the slogan “A generation that achieves its goals on its own.” The campaign promotes merit-based achievement and uses the hashtag #no2nepotism.

## IDEA MARATHON “THE CODE OF INTEGRITY”

The “Code of Integrity” Idea Marathon, held on 18–19 April 2024, was organized by the “Integrity Academy” and the STT. A total of 21 teams participated in the student and adult categories. Participants selected one of seven proposed topics or an open challenge of their own choice and, through a two-minute presentation, submitted original ideas for how to address them. Teams were supported by mentors from the “Integrity Academy” and STT anti-corruption education specialists. The ideas were evaluated by representatives from various institutions and organizations. The winning teams proposed ideas such as integrating an artificial intelligence tool into evaluation systems, and using mobile applications to help educational institutions more transparently and effectively manage received donations, or to enable anonymous consultations with the community and specialists about situations potentially involving corruption. The submitted ideas are expected to help address corruption-related challenges and support initiatives that strengthen anti-corruption awareness in schools and communities, while fostering and promoting a culture of integrity.

# VI. | INTERNATIONAL COOPERATION



Cooperation with foreign partners is not only an important area of the Service's activity but also one of its strategic priorities. By engaging in international initiatives, the Service gains valuable insights into other countries' experiences in corruption prevention and contributes effectively to the joint efforts of Lithuania and the international community in building a democratic and transparent society, streng-

thening public trust in state institutions, and protecting the public interest. Such engagement also helps shape a positive image of both the Service and Lithuania, while supporting better outcomes in the Service's day-to-day operations.

In 2024, the Service was particularly active and visible on the international stage.



## 21<sup>ST</sup> INTERNATIONAL ANTI-CORRUPTION CONFERENCE

**IACC**  
21<sup>ST</sup> INTERNATIONAL  
ANTI-CORRUPTION  
CONFERENCE

The most important event of 2024 was the 21st International Anti-Corruption Conference (IACC), held on 18–21 June at the LITEXPO exhibition and congress centre in Vilnius. After two years, the world's largest anti-corruption forum moved from Washington, D.C. (USA) to Vilnius, attracting more than 2 200 participants from 165 countries. Among them were politicians, heads of law enforcement and anti-corruption institutions, academics, journalists, representatives of NGOs, civil society, and the business community. The event featured 9 plenary sessions, over 100 workshops, 4 masterclasses, high-level key-

note speeches, a global law enforcement summit, and numerous bilateral meetings. The conference concluded with the adoption of the Vilnius Declaration, a high-level leaders' communiqué, and a joint statement by heads of law enforcement and anti-corruption agencies. The conference received exceptional praise, with many international guests stating that it was the best-organised IACC to date. It served not only as an excellent opportunity to promote Lithuania on the international stage but also to showcase the progress and leadership of the Special Investigation Service in the field of anti-corruption.



Preparation for the event began at the end of 2022, when the IACC Council decided that the next conference would be held in Lithuania. On 31 May 2023, the Government of the Republic of Lithuania assigned the STT to organise the 21st IACC and to coordinate the actions of other institutions and agencies necessary for its implementation. That same year, the Government signed a memorandum of understanding with the IACC Council, the global organisation “Transparency International”, and its Lithuanian chapter. By order of the STT Director, interinstitutional

and internal working groups were formed within the Service, which worked actively to prepare for this global event in Vilnius. In total, around 80 STT officers contributed in one way or another to the organisation of the conference, with the core organising team working intensively for nearly a year and a half.

Although the IACC required a great deal of effort and coordination, the STT remained actively engaged in other international cooperation activities throughout the year.



## LEADERSHIP IN THE EPAC/EACN NETWORKS

In 2024, as in previous years, the Special Investigation Service chaired the European Partners Against Corruption / European Contact-Point Network Against Corruption (EPAC/EACN), which brings together anti-corruption and police oversight bodies across Europe. This follows the election of STT Director Linas Parnavas as President of the network for a two-year term during the 2023 conference held in Dublin, Ireland. In recent years, the network has continued to grow. Institutions from Ukraine, Moldova, Romania, North Macedonia, and Kosovo have joined, bringing the total membership to 120 institutions from 39 European countries by the end of 2024.

Fulfilling its role as the EPAC/EACN Secretariat, the STT continued the EU-funded project aimed at facilitating the exchange of good practices among network members. The project supports 48 peer-exchange visits between national anti-corruption and police oversight authorities across Europe, as well as the organisation of two annual EPAC/EACN conferences. Launched in mid-2023, the project will continue for two years. The 23rd EPAC/EACN Annual Conference and General Assembly was held on 26–27 November 2024 in Bucharest, Romania, and brought together over 170 participants representing nearly 100 anti-corruption and police oversight institutions from 30 European countries. The conference concluded with the adoption of the Bucharest Declaration, which was addressed to EU institutions, international organisations, national governments, anti-corruption and police oversight authorities. The declaration presents key recommendations for strengthening the fight against corruption across Europe.

## PARTICIPATION IN INTERNATIONAL WORKING GROUPS AND STRENGTHENING OF BILATERAL RELATIONS

STT representatives continued to actively participate in the work of international anti-corruption groups under the European Union, the Organisation for Economic Co-operation and Development (OECD), the Council of Europe, and the United Nations. In the area of bilateral cooperation, STT's key foreign partners included the Corruption Prevention and Combating Bureau (KNAB) of Latvia, the Estonian Internal Security Service (KAPO), the Anti-Corruption Crimes Division of the Estonian Police and Border Guard Board, the Central Anti-Corruption Bureau (CBA) of Poland, the National Anti-Corruption Bureau of Ukraine (NABU), and the Ukrainian National Agency on Corruption Prevention (NACP), along with numerous other anti-corruption institutions across Europe and the United States.

Notably, the 21st International Anti-Corruption Conference, which brought together representatives from 165 countries to Vilnius, drew strong interest in Lithuania's and the STT's best practices. In total, in 2024, STT representatives shared their experience with counterparts from 19 different countries, and the Service welcomed 16 foreign delegations to its headquarters.



### CHAIRING THE MEETING OF THE OECD ANTI-CORRUPTION NETWORK (ACN) STEERING GROUP FOR EASTERN EUROPE AND CENTRAL ASIA

In 2024, the Service co-chaired the meeting of the Steering Group of the OECD Anti-Corruption Network (ACN) for Eastern Europe and Central Asia for the second time. Within this network, the Service cooperates with other countries from the region, OECD and EU member states, international organisations, non-governmental organisations, and business representatives. The main objective of the ACN is to support countries in combating corruption, promote anti-corruption initiatives, and facilitate the exchange of information and best practices. The Service contributes to ACN activities by sharing its best practices with the Eastern Partnership countries of the European Union and with Central Asian states—an effort aligned with Lithuania’s development cooperation priorities.

### DEVELOPMENT COOPERATION AND OTHER INTERNATIONAL PROJECTS

In 2024, representatives of the Service, together with the Italian National Anti-Corruption Authority (ANAC), launched the implementation of an EU Twinning project in Bosnia and Herzegovina, supporting the reform of the Agency for the Prevention of Corruption (APIK).

In addition, the Service began implementing three more EU-funded projects in 2024. The first project focuses on further developing the Services information technology tools used for evidence collection. The second aims to enhance the expertise of Service officers in the field of combating the bribery of foreign public officials in international business transactions. The third project, implemented with the support of OECD experts, is dedicated to developing a tool based on digital technologies and artificial intelligence to assess corruption risks in the use of public funds.





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