

Annex I

State Measures for Strengthening Business Integrity

In line with a number of resolutions of the Conference of the States Parties to the United Nations Convention against Corruption (UNCAC), including, inter alia, resolutions 5/6, 6/5, 9/6 and 9/8, as well as the commitments made by States parties in the political declaration entitled “Our common commitment to effectively addressing challenges and implementing measures to prevent and combat corruption and strengthen international cooperation”, adopted by the General Assembly at its special session against corruption held in 2021, the secretariat is seeking information on good practices, practical examples and lessons learned by States parties on the engagement of the private sector and the use of sanctions and incentives to strengthen business integrity in the last decade. The answers provided by States parties will be used to update the 2013 UNODC publication “A Resource Guide on State Measures for Strengthening Corporate Integrity” ([English](#) - [Spanish](#) - [Russian](#)) and to develop an e-learning tool that will further support States parties’ efforts to strengthen business integrity.

The Resource Guide provides a catalogue of measures that States parties can adopt to promote business integrity and the reporting of corruption involving the private sector. The Resource Guide features three chapters: i) The United Nations Convention against Corruption and the private sector, which describes the articles of the Convention that frame State interaction with the private sector; ii) Engaging the private sector, which outlines the business case for countering corruption with an emphasis on governance and other factors that can drive business integrity; and iii) Using sanctions and incentives, which describes the range of sanctions and incentives that have been developed to prevent and address corruption involving the private sector.

The secretariat invites States parties to disseminate this questionnaire among relevant stakeholders, with a view to identifying internal measures adopted by private sector organizations to prevent and counter corruption. Respondents may choose to answer the whole questionnaire or only sections that are applicable and relevant to a State party. The secretariat would especially welcome the provision of illustrative examples.

Respondents’ contact details will be kept confidential, but submissions will be made public unless a State party requests otherwise. The secretariat may contact a respondent to seek additional information.

To facilitate the process of providing information, the Government may wish to complete the [online questionnaire](#) (English only). Alternatively, the Government may wish to submit the questionnaire to the secretariat by email to florian.lair@un.org and sabrina.dandrea@un.org at its earliest convenience but no later than **31 October 2022**.

Questionnaire

Chapter 1 – The United Nations Convention against Corruption (UNCAC) and the private sector

Background: It is important that States' legislative and other measures contain sufficient detail to inform the private sector of their requirements and scope of application. In line with the principle of legal certainty, it is important to have clear provisions outlining prohibited conducts and consequences to the private sector.

1(a) Please describe (cite or summarize) good practices and/or examples of measures taken by your country to promote business integrity and/or reporting of corruption in the private sector in line with the United Nations Convention against Corruption.

Introduction – Slovak Republic

Responsible body

Conceptual, methodological-legal and management activities in the field of corruption prevention are provided by the Office of the Government of the Slovak Republic through the Department of Corruption Prevention. It is the main coordinating body for anti-corruption prevention and is also responsible for methodological guidance in the assessment and management of corruption risks.

As part of the prevention of corruption, the department has an established and published Anti-corruption line on its Internet and intranet pages, which serves exclusively for reporting suspicions of corrupt behaviour by employees, and a published Anti-corruption program, which is regularly evaluated and updated as of June 30. of the respective year, at the same time it has an adopted and published Anti-corruption policy, the purpose of which is to strengthen the prevention of corruption, minimize the scope for corruption and the emergence of corruption risks, discourage the commission of criminal acts of corruption by pointing out the consequences in case of its detection, strengthening the culture of ethics, integrity and anti-corruption behaviour.

TOPIC : Transparency in private sector

Ultimate Beneficiary Owners of companies in Slovakia

Slovakia has a good practice in efficient register of ultimate beneficiary owners (UBOs), so-called Public Sector Partners Register.

The purpose of the Public Sector Partners Register is to register beneficial owners of any private entity (both local and foreign) dealing with public finance or public assets. A proposal for registering data must be accompanied by a verification document produced by an intermediary (such as attorneys at law, banks, notaries or financial advisors) in which the intermediary actively verifies the shareholder and control structure of given company. Such a „snap-shot“ not only enables the register to make an ex ante judicial verification but it also facilitates any ex post investigation in case of a suspicion. As the law requires in-depth investigation and verification before submitting the data into the register, intermediaries can charge reasonable fees for this service which creates a positive motivation to secure good data in the register. The control by intermediaries is combined with both ex-ante and ex-post judicial verification which start ex officio or by a qualified proposal. A qualified proposal can be filed by anyone, but in our experience, it is usually filed by investigative journalists and NGOs who work with public data. A strict liability for the accuracy of the data is shared between intermediaries and their clients. It consists of severe financial punishments, guarantees for these punishments, strike-outs from the register (and thus losing the possibility to deal with the State) and also disqualification for directors of company.

TOPIC: Act on free access to information

Although Slovakia does not have an act on lobbying, it is balanced by a strong control of general public towards assets governed by corporations partially or fully owned by the State. The Act on free access to information (211/2000 Coll.) applies to these entities on the basis of its Article 2 para 2 and 3 ((2): “Legal entities established by law and legal entities established by state agency or municipality under

a special law shall also be the obliged persons. (3) Legal entities established by obliged persons in accordance with paragraph 1 and 2 shall also be the obliged persons.”

General public can request only information in relation to the management of public funds, disposal of state property, the property of self-governing region or the property of municipality, the environment, and information on the tasks or professional services relating to the environment and on the content, performance and activities carried out on the basis of the concluded agreement. Access to information is provided without proving any legal or other reason or interest for which information is required.

This Act also introduced an important measure to increase transparency in State administration through the provision on the obligatory publication of written contracts involving the management of public funds concluded by ministries, central state administration bodies, public institutions and their subordinate organizations in the Central Register of Contracts managed by the Government Office and published on its website <<https://www.crz.gov.sk/>>. Other obligated persons, including inter alia municipalities, cities, higher territorial units, or their contributory and budgetary organizations publish contracts on their website. Without publication, such contracts will not be effective. Although this measure aims primarily at State administration transparency, it also diminishes and prevents corruption in private sphere by making public any contract concerning public funds. Together with data accessible via the above-mentioned Public Sector Partners Register it enables the general public to access and link details about the vast majority of public funds usage.

TOPIC: Preventing conflict of interest

There is not the only one legal regulation of the conflict of interests in Slovakia. There exist various regimes regulating conflict of interest according to different categories of public officials/civil servants and codes of ethics for public officials and civil servants, members of the judiciary, the Police Force and members of Parliament.

*The Constitutional Act No. 357/2004 Coll. on the protection of public interest in performance of the functions by public officials (“Conflict of Interest Act”) governs obligations and restrictions for certain **public officials** to prevent conflict of personal interest in the performance of public function and the liability of public official for non-fulfilment or breach of obligations and restrictions stipulated thereof. The Act provides a definition of conflicts of interest (Art. 3(4)) and establishes mechanisms for their prevention and resolution.*

Article 6 provides for the declaration of personal interests, while article 7 provides for declarations of offices, employment positions, activities and economic standing. In particular, public officials are obliged to submit declarations of assets within 30 days from the day the respective public official took the public function and then annually while in office.

Public officials who fall under the Constitutional Act No. 357/2004 Coll. (Art. 2) are:

- a) President of Slovakia*
- b) Member of the National Council of Slovakia*
- c) Member of the Government of Slovakia*
- d) Heads of Central Bodies of State Administration who are not members of the Government of Slovakia*
- e) Judges of the Constitutional Court of Slovakia*
- f) Chief Judge of the Supreme Court of Slovakia and Deputy Chief Judge of the Supreme Court of Slovakia*
- g) Members of the Judicial Council of Slovakia*
- h) Prosecutor General of Slovakia and Special Prosecutor*
- i) Public Defender of Rights, Commissioner for Children and Commissioner for Persons with Disabilities*
- j) Head of the Supreme Audit Office of Slovakia and Deputy Heads of the Supreme Audit Office of Slovakia*
- k) State Secretaries*
- l) Chief of Staff of the Armed Forces of Slovakia*
- m) Director of the Slovak Intelligence Service*

- n) Member of the Bank Board of the National Bank of Slovakia*
- o) Mayors of municipalities*
- p) Mayors of towns*
- q) Deputies of municipal councils and Deputies of city district councils in Bratislava and Košice*
- r) Chairs of higher territorial units*
- s) Deputies of assemblies of higher territorial units*
- t) Rectors of public universities*
- u) Head of the Office for Personal Data Protection and Deputy Head of the Office for Personal Data Protection*
- v) Director-General of the Radio and Television of Slovakia and Members of the Council of the Radio and Television of Slovakia*
- w) Director-General of the Social Insurance Agency and Members of the Supervisory Board of the Social Insurance Agency*
- x) Statutory representative or members of the statutory body of the General Health Insurance Company and Members of the Supervisory Board of the General Health Insurance Company*
- y) Director-General of the News Agency of Slovakia and members of the Supervisory Board of the News Agency of Slovakia*
- z) Members of the Council for Broadcasting and Retransmission and Head its Office*
- za) Chair of the Office for the Regulation of Network Industries, Deputy Chairs of the Office for the Regulation of Network Industries and Members of the Regulatory Board*
- zb) Chair of the Office for the Regulation of Electronic Communications and Postal Services, Deputy Chair of the Office for the Regulation of Electronic Communications and Postal Services, Chair of the Transport Authority and Deputy Chair of the Transport Authority*
- zc) Statutory representative or members of the statutory body and members of the managing board of legal person who are nominated or appointed to their offices, directly or indirectly, by the state or by the legal person fully owned by the state; members of the controlling board and members of the supervisory board of legal person who are nominated or appointed to their offices, directly or indirectly, by the state or by the legal person fully owned by the state*
- zd) Director of a state-owned company, members of the supervisory board of a state-owned company who are appointed to their offices by the state and liquidator of the state-owned company liquidation*
- ze) Director-General of the Slovak Land Fund, Deputy Director-General of the Slovak Land Fund and members of the Board of the Slovak Land Fund;*
- zf) President of the Financial Directorate of Slovakia*
- zg) Chair of the Board of Directors of the Nation's Memory Institute and members of the Board of Directors of the Nation's Memory Institute*
- zh) Director-General of the Railways of Slovakia*
- zi) Members of the statutory body of the Export-Import Bank of Slovakia*
- zj) Chair of the Supervisory Board of the Healthcare Surveillance Authority and members of the Supervisory Board of the Healthcare Surveillance Authority*
- zk) Chair of the Board of the Council for Budget Responsibility and members of the Board of the Council for Budget Responsibility*
- zl) President of the Police Corps of Slovakia and Vice-Presidents of the Police Corps of Slovakia*
- zm) Director of the Military Intelligence Service*
- zn) Secretary-General of the Chancellery of the President of Slovakia, Secretary-General of the Chancellery of the National Council of Slovakia, Secretary-General of the Office of the Public Defender of rights of Slovakia, Secretary-General of the Office of the Judicial Council of Slovakia, Secretary-General of the Office of the Constitutional Court of Slovakia*
- zo) General secretaries of public-service offices of central bodies of state administration*
- zp) Public officials not referred to in sub-paragraphs a) to zo) where the law so provides.*

The incompatibility of certain functions, occupations and activities with regard to public officials is governed by the Art. 5 of Constitutional Act No. 357/2004 Coll. A public official cannot hold public offices, be in an employment relation and perform activities that are incompatible with the function of public office according to the Constitution of the Slovak Republic and laws.

When a public official violates the provisions governing conflict of interest under Constitutional Act No. 357/2004 Coll. he/she can be fined by a fine of twelve-month salaries.

Public officials are obliged to submit declarations of assets within 30 days from the day the respective public official took the public function and then annually when performing office till 30th April. Declaration of assets includes the following information on:

- *whether public official meets the conditions for incompatibility of performance of public function with performance of other functions, occupations or activities pursuant to Art. 5 par. 1 to 3 of Constitutional Act No. 357/2004 Coll.,*
- *what employment does the public official perform in an employment relationship, a similar employment relationship or a civil service relationship and what business activity does he/she perform in addition to the performance of the public function,*
- *what functions the public official performs in state bodies, in bodies of territorial self-government, in bodies of legal entities carrying out business activities and in bodies of other legal entities; it shall also state from which of these functions he/she receives income, functional or other benefits and the date from which he/she took up such a function,*
- *their income achieved in the past calendar year from the performance of the public function and from the performance of other functions, occupations or activities in the performance of which the public official continues even after taking up the public function,*
- *their property relations and the property relations of the spouse and minor children living in the household with a public official, including personal data in the scope of title, name, surname and address of permanent residence, as of 31 December of the previous calendar year,*
- *description of a gift or other benefits received by the public official in the calendar year for which he/she makes the notification if the value of gifts or other benefits from one donor or the value of one gift exceeds 10 times the minimum wage, including the type of gift and the date of receipt.*

Criminal Code of the Slovak Republic regulates the criminal offence of abuse of power/authority. Abuse of power/authority by public official is punishable by imprisonment from 2 up to 20 years depending seriousness of the conduct (§ 326 of the Criminal Code).

Conflict of interest with respect to members of the *judiciary*

In terms of incompatibility of position of judges considered public officials with certain offices, jobs and activities, Art 5 of the Conflict of Interest Act prohibits public officials to exercise offices, jobs and activities incompatible with position of judges considered public officials as set by the Constitution and relevant laws, engage in business (with some exceptions stipulated by law), act as a statutory representative or be a member of a statutory body or member of a managing, controlling or supervisory board of a legal person established to conduct business (with some exceptions stipulated by law).

The one year “cooling-off period” following departure from public office and associated restrictions as set in Section 8 of the Conflict of Interest Act, however, do not apply to judges of the Constitutional Court and members of the Judicial Council of Slovakia.

Pursuant to Article 54 of the Constitution, the right of a judge to engage in entrepreneurial and other business activity may be restricted by law. Section 23 of the AJLJ entitled “incompatibility with the exercise of the function of a judge” stipulates that being a judge is incompatible with service in another public body, civil service, employment contract, similar employment relationship, entrepreneurship, membership in a managing or supervisory body of a legal person engaged in business, or any other economic or gainful activity except for administering one’s own property, scientific, educational, literary or artistic activity or membership in the Judicial Council. In case of doubt, the Judicial Council shall decide on the obligation to terminate this function or activity, except for membership in the Judicial Council.

Furthermore, pursuant to Section 31 of the AJLJ, within 30 days from assuming office and, henceforth, on an annual basis, a judge is to submit a written statement to the JC indicating: (1) compliance with Section 23 above; (2) any benefits derived from permitted activities/functions; (3) relatives who are judges, employees of courts or Ministry of Justice, including organisations under the Ministry's jurisdiction; (4) any changes thereof, which are published together with asset declarations.

*Conflict of interest with respect to members of the **Police Force**:*

A member of the Police Force may not, in addition to the performance of his/her duties, perform any other paid function, engage in business or other gainful activity and be a member of administrative or supervisory bodies of legal persons engaged in business; this does not apply if, in the performance of official tasks, he/she acts under a temporary or permanent legend or if the membership of the Police Force member in the body of a legal person results from the law.

Other restrictions on the police officer to prevent conflicts of interest are regulated directly by law. A police officer may not be a member of a political party or political movement or carry out activities for their benefit (Section 48 para 5 of the Act No. 73/1998 Coll.). A police officer may not perform any other paid function, perform business activity or other gainful activity and be a member of administrative or control bodies of legal entities performing business activity (Section 48 para 6 of Act No. 73/1998 Coll.); the law also provides for exceptions to these restrictions. – this does not apply if the police officer, in the performance of his/her official duties, acts under a temporary or permanent legend or if the membership of the police officer in the body of a legal person results from the law.

*Conflict of interest with respect to members of the **Financial Administration**:*

A member of the Financial Administration may not conduct business or other gainful activity, mediate business relations with the state, municipality or higher territorial unit, request or accept gifts or benefits, or induce another to provide a gift or a certain advantage, favour close persons in the performance of state services and to be a member of the management, control or supervisory bodies of legal persons carrying on business. For the purposes of this Act, other gainful activity means an activity which establishes a right to income taxed in accordance with a tax regulation (Section 119 para 9 of Act No. 35/2019 Coll.).

*Conflict of interest with respect to **civil servants**:*

According to Section 111 (1) d) of the Civil Service Act (no. 55/2017 Coll.), the civil servant is obliged to refrain from any action which could lead to a conflict of interest between the civil service office and personal interests, in particular not misusing information obtained in connection with the performance of the civil service for his/her own benefit or for the benefit of another.

According to Section 111 (2) c) of the Civil Service Act, a civil servant is obliged to notify the civil service office about a possible or actual conflict of interest without undue delay.

Furthermore, a civil servant may not, pursuant to Section 112 (2) of the Civil Service Act:

- a) carry on business,*
- b) engage in any other gainful activity which is identical or similar to the activity specified in his/her civil service job description; other gainful activity for the purposes of this Act means an activity which gives rise to an entitlement to income taxed under a special regulation,*
- c) be a member of the governing, controlling or supervisory bodies of legal persons engaging in business activities, except for the general assembly and the members' meeting.*

The compliance with conflict of interest legislation is a matter of carrying out duties according to the Civil Service Act. Disobeying these regulations may result into disciplinary proceedings, and, eventually, in termination of the civil service relationship.

The Board for Civil Service is a special independent body authorized to oversee the adherence to the Ethics Code of Civil Servants, including questions related to conflict of interest. In addition, the Civil Service Act contains regulations on gifts and the acceptance of advantages in relation to the performance of service duties.

The Code of Ethics for civil servants, adopted by Government Decree in 2019, includes a definition of conflict of interest and sets out the basic standards for behaviour of a civil servant in a manner to avoid a conflict of interest.

TOPIC: Reporting system (whistleblowers)

In Slovakia, there is a legal obligation for organisations to set up internal reporting systems to enable employees from both public and private entities to report breaches of the law within their own organizations. This obligation was created by the adoption of the Act No. 307/2014 Coll. on Certain Measures Related to the Reporting of Anti-Social Activity and on Amendments and Additions to Certain Acts in October 2014 and entered into force in January 2015. The 2014 Act was replaced in 2019 by the new Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity and on Amendments and Additions to Certain Acts. The obligation to establish internal whistleblowing systems remained unchanged.

For the private sector, the threshold that creates the legal obligation for an organization to set up internal reporting system is having at least 50 employees. Such employers are also obliged to designate a person or an organisational unit to perform the duties of a so-called responsible person and to oversee the management of internal reporting systems and other specific tasks related to these systems (such as reception of internal reports and investigation of the reports). The duties are detailed in Section 10 of the Act No 54/2019 Coll.

Whistleblower Protection Office (WPO) started its operation in September 2021, and its duties include monitoring compliance of organizations with the provisions of the Act relating to the internal reporting systems and monitoring the way the employer treated the whistleblower at the time and/or after the report was made. The office also plays a role of the competent authority and receives external whistleblower reports. This includes both public and private sectors. In the first year of the functioning of the WPO (September 2021 – August 2022), 16 out of 69 whistleblowing related cases involved organizations from the private sector.

As a part of its prevention activities, WPO established connections with employer associations and private organizations to promote the agenda of whistleblowing and whistleblower protection. WPO also provides consultations to employers on the setup of the internal whistleblowing systems. In the first year of its functioning, it took part in 4 trainings/conferences with the private sector entities (company or employer association). It provided 6 written consultations to private sector entities, and additional shorter consultations over the telephone hotline.

WPO developed active cooperation with Slovak Compliance Circle, a leader in promoting business integrity in the country. WPO also participated on the Via Bona Slovakia award in June 2022, where

the President of WPO was a member of the committee that awarded the prize to a large enterprise with the best business integrity and ESG program

1(b) What challenges (if any) did you encounter in developing and/or enforcing such measures?

TOPIC: Reporting system (whistleblowers)

The main challenge of the WPO in its work with the private sector is more complicated accessibility of private organizations (compared to public sector) and initial focus of the WPO on the public sector. Another challenge is lack of willingness of representatives of some employer associations to promote the topic of internal reporting and downplaying the issue as unimportant.

1(c) Please describe the steps you took to overcome such challenges (if any).

TOPIC: Reporting system (whistleblowers)

WPO in cooperation with MEDIAN conducted an opinion survey among Slovak employers from the private sector with at least 50 employees in order to get a better understanding of their setup of internal reporting systems in June 2022. The findings will be used to establish a better strategy of working with the private sector. Additional activities are planned for the future, such as publication of the Guideline to set up internal reporting systems for the private sector organizations. To overcome the reluctance to cooperate, WPO plans to promote the topic and offer more concrete help through public discussions for business communities, training activities for staff members responsible for internal reporting systems and providing advice to both private and public organization. .

Chapter 2: Engaging the private sector

Background: Anti-corruption programmes, commonly referred to as compliance programmes, are a primary tool used by companies to advance ethical business practices. They provide a framework for articulating the values, policies and procedures used by a company to educate its employees and to prevent, detect and counter corruption in its business operations.

2(a) Please describe (cite or summarize) good practices and/or examples of measures taken by your country to promote integrity through anti-corruption programmes in the private sector.

Introduction of integrity standards or anti-corruption programs in private companies, especially small and medium-sized enterprises (SMEs) is not an obligation, it is voluntary.

In practice, Codes of Ethics and anti-corruption programs have been established and implemented mainly by large and medium-sized enterprises, especially with foreign participation, which have a good corporate culture, and at the same time those who are members professional associations and associations, or business unions.

At the initiative of the non-governmental non-profit organization Transparency International Slovakia, some large companies signed the Anti-Corruption Charter, in which they undertook to help increase transparency and limit corruption and not to give and not to accept bribes. In the field of public procurement the obligation of transparency should become a part of the contract between the contracting authority and the applicant when taking over the tender documents for public procurement. They committed themselves to make public all and every contribution to political parties and movements, to prepare a clear arrangement of donations and other benefits in connection with business activity and

to provide charitable contributions and sponsorship according to clear criteria so that they could not arouse suspicion of corruption.

2(b) Please describe (cite or summarize) good practices and/or examples of measures you have used to encourage transparency, public reporting and/or public participation through your anti-corruption programmes (both for the public and private sectors).

We focus on development and support for SMEs within support programs and projects, mainly through state aid schemes (ERDF, ESIF, INTERREG...); conferences, discussions and consultations aimed at improving the business environment. Regular survey of businessmen's opinions take place together with presentations of successful examples of business and SMEs practice.

2(c) What was the impact of the measures described above (2a and 2b)?

2(d) What challenges (if any) did you encounter in implementing the measures above (2a and 2b)?

Guidance on 2(a) and 2(b): Measures and good practices could, for example, include those designed to:

- Raise awareness of business integrity
- Encourage the private sector to establish anti-corruption policies, procedures and/or programmes
- Promote training and education on anti-corruption in the private sector
- Provide trainings or guidance, or develop model anti-corruption programmes or policies for companies to use and adapt
- Provide appropriate reporting channels
- Encourage public reporting of efforts to prevent and counter corruption in the private sector

Chapter 3: Using sanctions and incentives

Background: While effective sanctions for corruption offences are required under the United Nations Convention against Corruption, the Convention also recognizes the essential role of incentives that encourage and reward corporate self-reporting and preventive efforts.

Part A - Sanctions

3(a) Please describe (cite or summarize) good practices and/or examples of sanctions used to strengthen business integrity and/or reduce corruption in the private sector in your country.

*TOPIC: Transparency in Private Sector – **Public Sector Partners Register***

Sanctions:

- *If the Public Sector Partner fails to prove that data in the Register are true and complete (reversed burden of proof), judge can decide on its deletion from the Register.*
- *Moreover, harsh sanctions can be imposed to all involved:*
 - o Authorised person serves also as a guarantor for payment of fine by members of the board / managing body.*
 - o Public Sector Partner - fine equal to operating income from the deal with the state, if unknown – fine from EUR 10 000 up to 1 million.*

- o Members of the board / managing body of the registered entity – fine from EUR 10 000 up to 100 000 (joint liability) + they are disqualified for 3 years = i.e. they can-not serve as members of the company boards*
- o Authorised person – the same amount + he/she serves as a guarantor for payment of fine by members of the board / managing body*
- o UBO – fine up to EUR 10 000 if he/she does not inform Public Sector Partner that he/she became the UBO*
- o Public authority that signed the contract with unregistered Public Sector Partner – fine equal to 5% from the procurement price*
- o Person acting on behalf of the public authority that signed the contract with unregistered Public Sector Partner – fine EUR 1 000 up to 100 000*
- o Forced deletion from the Register results in a ban on registration for 2 years, which means no possibility to conclude contracts with the state during this period + with-drawal from the existing contract.*

The sanctions are harsh, but from 2015 to 2017 we had a Register of Ultimate Beneficial Owners without similar sanction mechanism and it proved quite inefficient. It was too easy to avoid the legal obligation to publish UBOs.

The efficiency of new register has been shown by the fact, that many companies that were obliged to be registered before 2017 and avoided this obligation, registered their UBOs after 2017 when the new sanction regime entered into force.

Nowadays the Register contains more than 31 000 of registered entities (approx. 10% of all entities registered in the Business Register).

3(b) What were the main challenges (if any) your country faced in enforcing these sanctions?

3(c) What steps did you take to overcome those challenges (if any)?

Guidance on 3(a): Sanctions could, for example, include any of the following:

- Monetary sanctions for legal persons (companies) liable for the participation in an offence of corruption
- Incarceration or other criminal sanction of natural persons (individuals) who have committed an offence of corruption acting on behalf of a company
- Confiscation of proceeds of corruption for both companies and individuals who acted on their behalf
- Contract remedies and other means to communicate and enforce anti-corruption contractual provisions
- Suspension and/or debarment of contractual partners from government processes
- Denial of government benefits (fiscal or otherwise)
- Liability for damages and compensation of victims of corruption
- Reputational damages to hold wrongdoers publicly accountable
- Any other type of sanctions not listed above

Part B - Incentives

3(d) Please describe (cite or summarize) good practices and/or examples of incentives used to strengthen business integrity and/or reduce corruption in the private sector in your country.

3(e) What is the main impact of such incentives?

Guidance on 3(d): Incentives could, for example, include any of the following:

- Penalty mitigation – encourages self-reporting of offences, credits companies' preventive efforts
- Procurement preference – rewards good practice through procurement preference
- Preferential access to benefits – rewards good practice with preferential access to government benefits and/or services
- Reputational benefits – encourages good practice through public recognition
- Whistle-blower protection and awards – encourages reporting of potential violations by individuals
- Any other types of incentives not listed above

Part C - Additional measures

3(f) Please describe (cite or summarize) good practices and/or examples of any other additional measures used to strengthen business integrity and/or reduce corruption in the private sector in your country.

Guidance on 3(f): Additional measures could, for example, include any of the following:

- Integrity pacts – written agreements between government agencies and companies to strengthen integrity in public procurement, usually overseen by an independent monitor
- Collective action – collaborative initiatives that bring companies and other relevant stakeholders together to prevent and counter corruption and raise standards of business integrity
- Public sector reform – civil service and/or regulatory reforms that reduce the opportunities for corruption
- Public education – activities that raise public awareness of corruption and its harmful effects

Additional information

Is there any other information that you wish to share which has not been addressed by the previous questions?