

## VIII. INTERNATIONAL COOPERATION

A succession of regional conflicts in the past eleven years has brought the countries in the Southeast Europe to the pressing necessity to rethink not only their strategies for development but also their relations with neighboring countries in a region-wide context. The commitment of the international community to a radical and comprehensive long-term program for stability and development in the Balkans provides a unique historic opportunity for the local communities. The regional crises of the past few years obviated the importance for comprehensive regional measures in two major ways:

- By emphasizing the need for going beyond country-specific efforts towards region-wide cooperation networks, particularly as regards issues of democratic governance. The importance of the NGOs in such networks in addressing cross-country problems in a comprehensive manner has further expanded the role of civil society;
- By emphasizing the need for a regional mechanism for assessing the effectiveness of international stabilization and recovery assistance. The success of reconstruction efforts depends to a large extent on the ability of national governments and their public administration to implement stability and reform policies. A high level of inefficiency and corruption of public administration may jeopardize the provision of large-scale financial assistance to the region by distorting its impact.

A number of reasons have kept corruption low on the priorities of international organizations prior to the mid-90s. Among these, and relevant to our analysis, is the consideration of corruption as an issue closely linked to domestic politics and thus not appropriate for development of assistance targeting. This is important to note, as similar considerations could still compromise the effectiveness of growing momentum of international anti-corruption cooperation.

Once there is universal international consensus that a particular issues belongs to the core of development concerns, diplomatic considerations of non-interfering in domestic politics seem to diminish. In the field of corruption this process has been spearheaded through the adoption of a number of international conventions – notably those of OECD and the Council of Europe. Good

governance has emerged since as a preoccupation for both developed nations, concerned with maximizing economic growth, and thus sensitive to corruption in international trade, and for developing countries tackling poverty and weak institutional capacity. Nevertheless, there is still little – with the notable exception of US assistance in Yugoslavia – anti-corruption conditionality in international donor help to the countries in the region.

Common programs between international organizations and encouragement of public-private partnership – both locally and between international institutions and local NGOs - are a way of circumventing the traditional diplomatic considerations facing international agencies when addressing politically sensitive issues of corruption in the national administrations. Even the best government assistance program by international donors is no substitute for developing the country's institutional infrastructure, enhancing the public's trust in institutions and empowering civil society.

It is notable that there are no regional efforts initiated by and prioritizing cooperation among the countries in SEE on development of joint measures to address cross-border corruption. Little effort is also made at the governmental level to encourage linkages between national anti-corruption programs.

Further, national anti-corruption programs need international assistance to be effective but equally, if not more importantly, they need to generate and respond to local civic demand. Thus international institutions, governments and civil society should all be considered when evaluating the impact of international anti-corruption cooperation in SEE.

The understanding that the adoption and implementation by the SEE countries of international legal instruments and their inclusion in the work of international fora in this area is largely sufficient at this stage of development is shared by both international agencies and regional governments. These efforts are, however, sometimes compromised by “variable international institutional geometry” in the region – countries belonging to different international organizations and processes which determine varying levels of engagement and interests.

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On the wake of 1997 social unrest, the government of **Albania**, which came out of the mid-year elections, launched an anti-corruption initiative with donor support, the World Bank being the lead organization. First, it was designed as a program to fight corruption. This government's program was broad and comprehensive, including more than 150 specific measures in the areas of economic policy, rule of law, public administration, procurement, audit and public awareness. Implementation of the program to date has been mixed at best, due to a variety of factors. The political leadership itself was not free from the charges of corruption. The public sector was one of the only sources of patronage for the newly elected Socialist Party coalition, creating political constraints on the reform. There was no unbiased forum of "last resort" since enforcement agencies and the judiciary were incapable of functioning properly and were themselves burdened by allegations of corruption. The Prime Minister changed three times within a two-year period. Another problem was the Kosova crisis in 1999. The crisis made corruption issue a second hand priority for both the government and donors.

There also is in place an anti-corruption initiative under the Stability Pact. On 18 and 19th of December 2000 in Strasbourg the first meeting of the leading team for the Anti-Corruption Initiative of the Stability Pact for Southeast Europe was held. Albania presented in that strategy the revised Anti-Corruption Matrix as a governmental strategy.

**Bosnia and Herzegovina's** unique constitutional status determines a special type of relation to international anti-corruption cooperation. Both Entities have prepared a set of anti-corruption legislation and large-scale alterations of the existing laws, which is a continuous process. These laws are being prepared in close co-operation of the Entity Ministries of justice and the international institutions together. The aim is to ensure their mutual compatibility.

All legislation should engulf the provisions of the relevant international conventions, as well as the recommendations of the Ministers of Justice Conference (1994) and the Programme of Action Against Corruption adopted by the ministers of the Council of Europe (1996). Support of international institutions is expected in seeking the adequate solutions and their harmonization with the internationally recognized practice.

The UNMIBH Mandate Implementation Plan (MIP) is a consolidated strategic and operational framework for the completion of UNMIBH's core mandate in Bosnia and Herzegovina by 31 December 2002. On the basis of the relevant Security Council resolutions (SCR), the MIP identifies the objectives of the mission and the programs and modalities that will be used to achieve those objectives. UNMIBH's mandate is derived from the following SCR's and is extended to:

- monitor, advise and train law enforcement agencies;
- monitor the investigations of, or to independently investigate human rights abuse committed by law enforcement agents/agencies;
- implement civilian law enforcement aspects of the Brcko Arbitral Award;
- provide specialized training to the local police in areas of drug control, organized crime and incident management;
- monitor and assess the court system and contribute to overall judicial reform efforts coordinated by the Office of the High Representative.
- continue with the tasks set out in Annex 11 of the GFAP, as well as the Conclusions of the London, Bonn, Luxembourg, Madrid and Brussels Conferences and agreed by the authorities in Bosnia and Herzegovina.

UNMIBH's role is to assist the parties to establish the foundations for effective, democratic and sustainable law enforcement agencies. This requires action at three levels: the individual police officer; the institutions of law enforcement; and the relationship between law enforcement agencies and civil authority and society. The specific and realizable goals UNMIBH has established for its work constitute a comprehensive approach to all three levels.

UNMIBH's goals take into account the legacy of the war, current political conditions, rational expectations of the population, local policing traditions and the aspirations of BiH to join the European family of nations. Progress towards attaining the goals is bound to be affected by the actions of other members of the international community, pursuant to their respective mandates. However, overall success in meeting and sustaining the goals will be determined by the cooperation of the local leadership and, especially, the willingness of police personnel to perform their duty.

At the PIC Conference in Bonn in December 1997, the PIC called on the OHR to design a strategy to combat corruption, fraud and diversion of public funds. There was growing concern about the level of corruption in Bosnia and Herzegovina. As a result, the Anti-Fraud Unit was established, which later became the Anti-Fraud Department (AFD).

The AFD assists local authorities in identifying and prosecuting illegal activities, following court cases through all phases of the judicial process, and strives for the resolution of systemic problems through reforms of the legal and judicial systems. Additional priorities include the drafting and passage of anti-corruption legislation in accordance with international standards, increased transparency in government procedures, and a strengthened civic society involvement in anti-corruption initiatives.<sup>58</sup>

The AFD has drafted a comprehensive Anti-Corruption Strategy for Bosnia and Herzegovina, which was approved by the Steering Board in March 1999 and is being implemented by the AFD and a dozen international organizations in cooperation with the BiH authorities. The supporting international agencies include IMF, the World Bank, the European Commission, CAFAO, USAID, IMG, INL, OSCE, IPTF, and SFOR.<sup>58</sup>

The World Bank approved a US\$11 million equivalent (SDR 8.7 million) credit for the Trade and Transport Facilitation in Southeast Europe Project (TTFSE) in Bosnia and Herzegovina (BiH) that will foster trade by promoting more efficient and less costly trade flows across the borders in Southeast Europe and provide European Union-compatible customs standards on February 22, 2001.

The project will reduce non-tariff costs to trade and transport and reduce smuggling and corruption at border crossings. The project is the sixth to be approved in a regional program for TTFSE that will strengthen and modernize customs administrations and other border control agencies in BiH as well as in Albania, Bulgaria, Croatia, FYR Macedonia, and Romania. The program is a result of a collaborative effort among the governments of these countries in association with the Southeast European Cooperative Initiative (SECI), assisted by the World Bank, the European Union, and the United States.

**Bulgaria's** attitude towards international anti-corruption cooperation in the region of SEE has

been marked by its effort to separate EU accession efforts from the regional context. Thus, the previous government tried to play down the importance of such cooperation, while the succeeding one is indicating its appreciation of the international dimension of domestic anti-corruption efforts.

Admittedly, there was a proliferation of international initiatives aimed at monitoring the progress of transition countries, particularly those in Central and Southeast Europe to combat corruption. Most of these initiatives did not account for other existing mechanisms or the other international institutional affiliations of a given country and there has consequently been little in terms of coordination among these initiatives.

The UDF government (1997-2001), however, misinterpreted the enhanced international concern with corruption in Bulgaria and distanced itself from a number of initiatives. Notable examples were its attitude towards the Stability Pact Anti-Corruption Initiative and its failure to send a government delegation to the Second Global Forum on Fighting Corruption and Safeguarding Integrity held in the Hague in May. The Forum was a follow up to the first meeting hosted by the then US Vice President Al Gore in 1999 in Washington. The country also did not participate in the consultative meeting of the countries of Central and Eastern Europe and was not included in the Joint Position of the Participants at the Consultative Meeting of CEE Countries on Fighting Corruption, adopted in preparation of the Forum.

The apprehension of the government reflected a particular dilemma that it faced in 2001. On the one hand, it was rightly concerned about the international image of the country and the promotion of the success of its reforms. To be sure, there is a possibility that what is domestically an awareness campaign aiming to sensitize policy makers and increase public intolerance by emphasizing corruption issues in the public debate, internationally could be interpreted as deteriorated governance, thus mistaking the symptom for the disease. Nevertheless, the Corruption Perceptions Index published annually by Transparency International, points that enhanced corruption awareness in Bulgaria has had exactly the opposite effect –Bulgaria climbed from 67 (out of 85 countries) in 1998, to 47 in 2001, and 45 in 2002 (above the Czech Republic).

<sup>58</sup> OHR's website on AFD (<http://www.ohr.int/ohr-dept/afd/>)

The UDF government, however, failed to appreciate that mainstreaming corruption both into public debate and government policies is an important condition for building trust among the international community towards the country. Although the government might have had some legitimate concerns about the approach of the international community in this area, its diplomatic awkwardness was counterproductive in trying to persuade Bulgaria's international partners in its anti-corruption credentials.

In particular, during the first half of 2001, the Bulgarian government voiced concerns both about the general role of the Stability Pact and its effectiveness, as well as about the role of Bulgaria. Several arguments were put forward:

- That Bulgaria needs to participate as a "resource," rather than a "beneficiary" country in the Stability Pact Anti-Corruption Initiative (SPAI);
- That there is a contradiction between the scope and genesis of the problem – corruption bred by political instability (meaning that this pertains to area of the so called Western Balkans) – and the platform for solving, namely all of SEE countries, including those on EU and NATO accession track;
- That the Pact and SPAI do not account for the widely varying levels of development and do not distinguish between countries contributing to and those undermining stability;
- That Bulgaria is already participating in a number of monitoring procedures that include assessment of corruption (GRECO, EU regular report, OECD convention, etc) which makes SPAI monitoring redundant. For example, in July the government pointed out that Bulgaria should be part of SPAI only through the fulfillment of the criteria of the Justice and Home Affairs chapter of its accession to the EU. Whether these arguments had aimed at exerting additional pressure with respect to lifting the Schengen area visas for Bulgarians, is a matter for another discussion.

Thus, the government faced a dilemma with the anti-corruption efforts of the Stability Pact. On the one hand, it worried that being linked to the stabilization agenda of the Western Balkans, including in the field of anti-corruption, could slow it down on the road to the EU because of shifting priorities and diverted resources, particularly in the public administration. This was particularly

relevant from the point of view of the tangled web of overlapping monitoring procedures the government was referring to. On the other, the Stability Pact is an important platform for dealing with continuing instability and security risks, which undermine democratization and diminish already low investor confidence. More importantly, the Pact was a very good opportunity for attracting support and investment for crucial regional infrastructure projects which Bulgaria's future depends heavily on.

Balancing involvement in regional cooperation initiatives, particularly in sensitive areas such as anti-corruption, with an accelerated EU accession process would not be an easy task for any Bulgarian government. The government will, however, always bear the burden of responsibility for convincing Bulgaria's international partners that EU accession is not being used as an excuse for disengagement from joint measures against problems with as many cross-border roots as those present in the Balkans.

**Croatia** has been putting significant efforts into joining international anti-corruption cooperation. The country has acceded to the Global Programme of the United Nations against corruption (UN Global Programme Against Corruption). A delegation of Croatia has been actively participating in the work of the Ad Hoc Committee of the General Assembly of the UN for Drafting the Convention Against Transnational Organized Crime since its establishment. Croatia has also agreed to the implementation of 40 recommendations of the Financial Action Task Force on Money Laundering (FATF). In the implementation of the internal criminal law order, Croatia has tried to implement as extensively as possible the so-called guiding principles for fighting corruption and safeguarding the integrity between justice and the security officials (these were signed at the Global Forum on Fighting Corruption, Washington DC, 1999).

Croatia has joined the Stability Pact which, even though it does not have the force of a treaty, imposes a political obligation. "The Anti-Corruption Initiative for Southeast Europe" and the "Ancona Declaration" (1999) encourage the cooperation of police and judiciary bodies in fighting corruption and organized crime. The OECD Convention on Fighting Bribery of Foreign Public Officials has special significance. The convention envisages a range of obligations towards candidate countries: the obligation to criminalize the bribing of foreign officials, the obligation to provide legal assistance, etc. The Convention



came into force on February 15th, 1999. The Convention envisages the possibility for the accession of countries that are not OECD members, so the RC has announced its intention to join the Convention. Practically all significant international forums – ranging from interparliamentary associations, employers' associations and trade unions, to banking institutions (the World Bank, the IMF), and even bishops' synods – have emphasized the need to fight corruption.

The intention of the European Commission to enhance co-operation in the development of democracy and civil society and institutions is welcomed in Croatia. The intention of the initiative to establish co-operation in the field of judicial and internal affairs is also welcome and considered necessary, especially in the context of more effective border controls and combating organized crime and corruption, which rank among the priority tasks in Croatia.

With a view to raise awareness about the costs of corruption in business transactions and promote private sector pro-active strategies to reduce bribery, in line with the SPAI objectives, the Integra Foundation (Slovakia) recently published, in partnership with the Ruke Association (Croatia) and Kulturkontakt (Austria), the "Coping with Corruption Toolkit" for small- and medium-sized enterprises (SMEs) in Croatia. The report, which is available in English and Croat, can be ordered free of charge at: <http://www.integra.sk>. The report is the result of a survey conducted among small businesses in Croatia in 2001 and aimed at determining the nature and costs of corruption for Croatian SMEs and at identifying pro-active strategies to enable SMEs to reduce corruption within their stakeholder circle. Among the most striking results of the report is that 82 % of the surveyed SMEs support anti-corruption initiatives initiated at the national (Croatian) and international levels. The Croatian SME anti-corruption research project is part of a larger project carried out by the Integra Foundation in Eastern Europe which aims to identify corruption-related problems faced by SMEs in the region and efficient strategies to cope with them.

In addition to the technical expertise delivered in the field of the rule of law the Council of Europe is currently providing technical assistance to the Croatian authorities on the issue of international co-operation and mutual legal assistance. Further technical assistance could be provided with regard to the revision of criminal legislation, especially in the area of the use of special investigative means and confiscation of proceeds of crime.

Within the framework of harmonization of the domestic legislation with the international, **Macedonia** accepted most of the relevant international instruments for fighting corruption. Accepting the international documents the Government did not show any reservations in regard to the content of the documents, which provides a solid basis for building a contemporary anti-corruption legislation designed in accordance with the international standards.

Macedonia is at the very bottom of the list of countries in the region in regard to the quality of domestic anti-corruption legislation. The different governments did not have the political will to pass the necessary laws and sub-legal acts for efficient prevention of corruption.

The basic law, which should implement all the international standards in regard to corruption – the Law on Corruption Prevention - has not been passed yet.

In March 1997 within the framework of the joint project between the European Union Commission and the Council of Europe – Corruption and Organized Crime in the Countries in Transition (Octopus), the government of Macedonia was addressed with recommendations and guidelines for action, which include several directions of action:

- enhancement of corruption and organized crime estimation;
- enhancement of public knowledge about the threats coming from corruption and organized crime and similar acts;
- corruption and organized crime prevention;
- increase in the efficiency of the policy on crime control;
- increase of the efficiency of the regulatory policy in corruption and organized crime control;
- modernization of the investigation means in a way which is in compliance with the European Convention on Human Rights and Fundamental Freedoms and other international document;
- enhancement of the efficiency and the effectiveness of the international cooperation;
- formulation of the codex of conduct of the civil servants;

- legal regulation of the conflict of interest and the access to information.

The bilateral and multilateral donor's organizations have poor record supporting the anticorruption programs in Macedonia. This is due to two basic reasons:

- The donors' community for unjustifiably long period of time and with an enormous percentage of funds was oriented towards projects in the field of interethnic relations and civil society, mostly on a grass-root level, while anti-corruption until a year or two ago was not on the agenda of most of the donors. As an illustration the Institute Open Society - Macedonia regardless of the concrete program efforts refused the request for support in establishing the Macedonian National Chapter of Transparency International.
- The NGO sector in the country that is mostly supply driven did not succeed in advocating its agenda by pressuring the donors' community to include the anticorruption programs in their agendas. This is among others due to the fact that the civil sector until now did not have sufficient capacity to overcome the subordinate role in regard to the executive power and to get involved in the treatment of a complex and sensitive phenomenon like corruption.

The developments during and after the crisis in the Republic of Macedonia as well as the analyses showed that one of the fundamental reasons for the crisis was the absence of rule of law and the high level of corruption in the country and the region. The representatives of the international community more and more openly point out the issue of anticorruption, which is treated more openly on public debates and in the media in the country. This has contributed for the anticorruption to climb a bit higher on the agenda of the bilateral and multilateral donors. For now, the issues like the building of confidence, reconstruction of the destroyed homes, returning of the displaced persons and organizing fair and democratic elections will continue to dominate.

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As noted in the introduction, one of key challenges facing regional anti-corruption cooperation is broadening the responses to cross-border corruption factors by enhancing public-private partnerships. This has been the main objective of

the Southeast European Legal Development Initiative (SELDI). SELDI is an effort of leading not-for-profit organizations, representatives of government and intergovernmental institutions and experts from the countries of Southeast Europe aimed at **public-private coalition building** for legal development in the countries of Southeast Europe.

SELDI is a joint initiative of the Center for the Study of Democracy (CSD), a Bulgarian policy institute and the International Development Law Institute (IDLI) ([www.idli.org](http://www.idli.org)), an inter-governmental organization based in Rome, to build upon the success of the *Coalition 2000* process in Bulgaria ([www.online.bg/coalition2000](http://www.online.bg/coalition2000)), the *Judicial Reform Initiative for Bulgaria* (JRI) ([www.csd.bg/jri](http://www.csd.bg/jri)), and other previous efforts in Bulgaria by these two organizations aimed at promoting the rule of law and a institutional environment beneficial to the transition process and economic development.

SELDI is distinguished from the other region-wide initiatives as being the **first NGO-led effort to encourage public-private cooperation as an instrument for regional development**. The Initiative provides a forum for cooperation among the most active civil society institutions, public figures and government and international agencies in Albania, Bosnia & Herzegovina, Bulgaria, Croatia, Macedonia, Romania, and Yugoslavia.

For the past two years coalition building for anti-corruption has been the most active area of work for the Initiative. The overall objective of the SELDI anti-corruption component is to introduce a region-wide institutional framework for **public-private cooperation in countering corruption** in the countries of Southeast Europe.

It is proceeding through a two-step process: **diagnosing corruption** and assessing the institutional environment followed by the development and endorsement of a **Regional Anti-Corruption Action Agenda** supported by an awareness campaign.

The results so far of SELDI include **enhancing civic capacity** throughout the region to maintain a watchdog role as well as to engage public institutions in the design and implementation of anti-corruption policies. The achievements in this area so far include three unique products:

- The first ever **region-wide corruption diagnostics**<sup>59</sup> carried out in Albania, Bosnia & Herzegovina, Bulgaria, Croatia, Macedonia, Romania, and Yugoslavia on the basis of a uniform methodology.
- **Training for watchdog capacity** for a critical number of civil society organizations in SEE.
- An **assessment of the institutional environment**, contained in this report, as regards public administration, the judiciary, economy, civil society and media and international cooperation against corruption in the SEE countries.

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<sup>59</sup> <http://www.seldi.net/indexes.htm>

## Membership in Major International Organizations of SEE Countries

| Organization           | Council of Europe (CoE) | World Trade Organization (WTO) | European Union (EU)  | Organization for Security and Cooperation in Europe (OSCE) | European Bank for Reconstruction and Development (EBRD) | Euro-Atlantic Partnership Council (EAPC) | World Bank (WB)          |
|------------------------|-------------------------|--------------------------------|--|--|---|--|--------------------------|
| Country                |                         |                                |  |  |   |  |                          |
| Albania                | Member                  | Member                         | Negotiations for Stabilization & Association Agreement (SAA) | Member   | Member  | Member                                   | Member                   |
| Bosnia and Herzegovina | Member                  | Observer                       | Negotiations for SAA   | Member   | Member  | No                                       | Member                   |
| Bulgaria               | Member                  | Member                         | EAA  | Member   | Member  | Member                                   | Member                   |
| Croatia                | Member                  | Member                         | SAA, 29 Oct 2001   | Member   | Member  | Member                                   | Member                   |
| Macedonia              | Member                  | Observer                       | SAA  | Member   | Member  | Member                                   | Member                   |
| Romania                | Member                  | Member                         | EAA  | Member   | Member  | Member                                   | Member                   |
| Serbia                 | Guest                   | Observer                       | SAA  | Member   | Member since April 2001                                 | No                                       | Member since may 8, 2001 |

| Organization           | Central European Free Trade Agreement (CEFTA) | Central European Initiative (CEI) | Black Sea Economic Cooperation (BSEC) | Stability Pact for Southeast Europe (SPSEE) | Anti-corruption Initiative for South Eastern Europe (SPAI) | South East European Cooperation Process (SEECP)   | Southeast European Cooperative Initiative (SECI) |
|------------------------|---|-----------------------------------|---------------------------------------|---|--|---|--|
| Country                |   |                                   |                                       |   |  |   |  |
| Albania                | No  | Member                            | Member                                | Member                                      | Member   | Member  | Member   |
| Bosnia and Herzegovina | No  | Member                            | No                                    | Member                                      | Member   | Member<br><a href="http://www.see.gov.mk/parliaments/general_info.htm">http://www.see.gov.mk/parliaments/general_info.htm</a> | Member   |
| Bulgaria               | Member  | Member                            | Member                                | Member                                      | Has not participated since 2000                            | Member  | Member   |
| Croatia                | No  | Member                            | No                                    | Member                                      | Member   | Observer  | Member   |
| Macedonia              | No  | Observer                          | No                                    | Member                                      | Member   | Member  | Member   |
| Romania                | Member  | Member                            | Member                                | Member                                      | Member   | Member  | Member   |
| Serbia                 | No  | Observer                          | No                                    | Member                                      | Member   | Member  | No   |



## Accession to major international anti-corruption legal instruments

| Legal Instrument  | Country                | Date of signature | Date of ratification | Date of entry into force |
|---|------------------------|-------------------|----------------------|--------------------------|
| Civil Law Convention on Corruption, Council of Europe   | Albania                | 04-04-00          | 21-09-00             | -                        |
|   | Bosnia and Herzegovina | 01-03-00          | 30-01-02             | -                        |
|   | Bulgaria               | 04-11-99          | 08-06-00             | -                        |
|   | Croatia                | 02-10-01          | -                    | -                        |
|   | Macedonia              | 08-06-00          | -                    | -                        |
|   | Romania                | 04-11-99          | 23-04-02             | -                        |
|   | Serbia and Montenegro  | -                 | -                    | -                        |
| Criminal Law Convention on Corruption, Council of Europe  | Albania                | 27-01-99          | 19-07-01             | 01-07-02                 |
|   | Bosnia and Herzegovina | 01-03-00          | 30-01-02             | 01-07-02                 |
|   | Bulgaria               | 27-01-99          | 07-11-01             | 01-07-02                 |
|   | Croatia                | 05-09-99          | 08-11-00             | 01-07-02                 |
|   | Macedonia              | 28-07-99          | 28-07-99             | 01-07-02                 |
|   | Romania                | 27-01-99          | 11-07-02             | 01-11-02                 |
|   | Serbia and Montenegro  | -                 | -                    | -                        |
| Convention on Combating Bribery of Foreign Public Officials in International Business Transactions - OECD Status as of January 2002 | Albania                | -                 |                      |                          |
|   | Bosnia and Herzegovina | -                 |                      |                          |
|   | Bulgaria               | -                 | 22-12-98             | 20-02-99                 |
|   | Croatia                | -                 |                      |                          |
|   | Macedonia              | -                 |                      |                          |
|   | Romania                | -                 |                      |                          |
|   | Serbia and Montenegro  | -                 |                      |                          |