

ANNEX A: THE REQUEST FOR THE RELEASE OF FUNDS

Belgrade, February 26th 2026

H.E. Mr. Andreas von Beckerath
Ambassador and Head of Delegation of European Union to the Republic of Serbia

I declare that, for the implementation of the EU financial assistance to the Republic of Serbia under the Facility for the relevant period, based on my own judgement and on the information at my disposal, as well as on the evidence enclosed, the payment conditions set out in the Republic of Serbia Reform Agenda for the following steps have been fulfilled:

Reform	Step	Financial Value
1.2.1 Enhanced investment and development opportunities for entrepreneurs and private sector	The level of transparency regarding all projects contracted under intergovernmental agreements is increased by introducing project-specific information on the website of the ministry in charge of implementing the project on any completed, ongoing and new procurement contracts under intergovernmental agreements. All contracts under intergovernmental agreements will be published starting from December 2024 and this practice will be maintained in the following years for all new contracts: including: name of the project; basic procurement contract information; contracting authority; main contractor and procurement procedure followed	EUR 20,381,435.06
1.2.1 Enhanced investment and development opportunities for entrepreneurs and private sector	Final inventory submitted in line with the European Commission's comments from March 2024.	EUR 3,396,905.84

1.2.1 Enhanced investment and development opportunities for entrepreneurs and private sector	Changes in the Rules of Procedure of the Government so that the decision to conduct a public hearing, the program of the public hearing and the deadline for its implementation are determined by the Government, instead of a competent committee, upon the proposal of the proponent	EUR 13,587,623.37
1.2.2 Further Development of the science and innovation ecosystem for a knowledge-based economy	Full alignment with the European Research Infrastructure Consortium (ERIC) Regulation is reached	EUR 13,587,623.37
1.3.1. Enhance the competitiveness of the agricultural sector	At least 10 projects financed from the national budget, not exceeding EUR 299,999 per project, contracted under public calls aimed to improve rural public infrastructure in the areas of water supply and road infrastructure facilities	EUR 13,587,623.37
2.1.1. Implementation of the 3rd Energy Package for gas, and of the electricity integration package	Allocation of capacities at Horgos and IBS border points is opened	EUR 20,381,435.06
2.1.6 Implementation of MRVA	Competent authority [for the implementation of the rules of the ETS Directive] approves monitoring plans [in line with national legislation that transposes the Commission Implementing Regulation [EU] 2018/2066 [MMRR]]	EUR 6,793,811.69
2.1.5. Implementation of the Renewable Energy Directive (permitting, guarantees of origin, prosumers)	Designation of a single contact point in line with the RED II Directive	EUR 13,587,623.37

2.1.3. Implementation of the Just Transition Action Plan	The establishment of the Just Transition governance process in accordance with the adopted Just Transition Action Plan and Just Transition Fund for Serbia is established with the financial support of the European Union [via the Reform and Growth Facility] and potentially other donors	EUR 13,587,623.37
2.2.4 Setting-up a comprehensive framework for cyber resilience and artificial intelligence	The Law on Information Security is adopted by the Parliament in full alignment with the NIS2 directive	EUR 13,587,623.37
2.2.4 Setting-up a comprehensive framework for cyber resilience and artificial intelligence	The Office for Information Security [within the Office for IT and e-Government] is operational [sufficiently staffed with at least 20 employees, equipped with supervisory powers, performing supervisory checks]	EUR 13,587,623.37
4.2.2 Enhance freedom of expression by amending the laws on electronic media and on public information and media to align with the EU acquis and European standards and by adopting the law on public service media and ensure implementation	The three following laws are adopted, following consultations with the Commission: The law on electronic media and the law on public information and media are amended to align fully with the EU acquis and Council of Europe's standards; a new law on public service media is adopted in line with the media strategy, the EU acquis and Council of Europe's standards	EUR 20,381,435.06
4.3.1. Tackling of organized and serious crime	Following consultations with the Commission, new strategic document and accompanying Action Plan (2025-2030) for the control of Small arms and light weapons (SALW) in line with the provisions of the revised Regional	EUR 6,793,811.69

	SALW Roadmap for Western Balkans are adopted	
		Total EUR 173,242,197.99

On the basis of the above, I request that the amount of EUR 173,242,197.99 is made available, EUR 80,599,311.36 disbursed directly to the treasury of the Republic of Serbia, and EUR 92,642,886.63 to be made available through the Western Balkans Investment Framework (WBIF), of which EUR 42,924,537.47 in the form of loans and EUR 49,718,349.16 in the form of non-repayable support¹².

I hereby attach an assessment of each step, the required evidence showing the satisfactory fulfilment of the qualitative and quantitative steps set out in the relevant Annex to the Commission implementing decision³ and other information requested as per Article 14 of the Facility Agreement.

I hereby also declare that measures related to the reforms for which satisfactory fulfilment has been declared previously in prior Commission decisions have not been reversed by the Republic of Serbia.

Belgrade, February 26th 2026

Signature by the Coordinator



STAROVIĆ Nemanja,
Minister of European Integration
Government of the Republic of Serbia

¹ Subject to rules laid down in Articles 16 and 17, each instalment shall draw from the indicative financial contributions set out in Article 2 paragraph 2, as follows: a) 28.7% from the non-repayable support and 24.8% from the loan support, in sum 53.5%, to be made available through the Western Balkans Investments Framework (WBIF), and b) 46.5% from the loan support to be channelled directly to the treasury.

² A condition precedent to the disbursement of the loan to the Treasury, to be channelled to the WBIF, is the submission of the signed contribution arrangement with the WBIF. This signed arrangement must be provided before any loan disbursements are processed.

³ Commission Implementing Decision C(2024)7375 of 23 October 2024

Annexes:

SUMMARY OF CHECKS PERFORMED BY RELEVANT AUTHORITIES ON THE STEPS FOR WHICH FUNDING IS REQUESTED, INCLUDING WEAKNESSES IDENTIFIED AND ANY CORRECTIVE ACTIONS TAKEN

Pursuant to Article 5(3) of the Facility Agreement, the National Coordinator plays a central role in facilitating and overseeing the process of verifying the implementation of the qualitative and quantitative steps identified in the Reform Agenda, as well as in supporting the preparation and submission of requests for the release of funds. This role is exercised in close coordination with the appointed coordinators for the respective policy areas and other responsible national institutions, with the objective of reviewing progress achieved and assessing the reliability of the information provided. In fulfilling this mandate, the National Coordinator, together with the relevant authorities, ensures that appropriate verification mechanisms are established and applied, including procedures such as desk reviews and, where relevant, on-the-spot checks.

Within this framework, the Technical Secretariat of the National Coordinator (hereinafter: NC TS) carried out verification activities throughout the reporting period, combining desk-based checks with structured coordination and targeted exchanges with competent national institutions. These activities were aimed at confirming the implementation status of individual steps and assessing the availability, relevance, and clarity of the supporting evidence. Where weaknesses, gaps, or deficiencies were identified, they were communicated to the responsible authorities and addressed through corrective measures or additional clarifications, as appropriate.

The standard mode of operation for coordination between NC TS, Policy Area Coordinators, and the line institutions responsible for the implementation of individual steps is based on the Implementation Plan for the Reform Agenda. The Implementation Plan represents a dynamic operational mechanism, which is continuously updated and further elaborated as implementation progresses. Within this mechanism, each step of the Reform Agenda is broken down into sub-steps leading to its fulfilment, allowing for the progressive refinement of implementation planning and more detailed tracking of developments over time.

Also, through different types of ad hoc reporting prepared for various decision-makers, the NC TS collects and reviews information from line institutions on the progress of steps. These reports enable continuous monitoring, clarification of issues, and ensure that information remains accurate and sufficiently detailed.

In addition to regular written exchanges, meetings constituted a key format for ensuring continuous information sharing, coordination, and timely follow-up on implementation progress throughout the reporting period. These meetings were held at several levels, allowing for both strategic oversight and detailed technical discussions, depending on the nature of the issues addressed.

At the highest level, meetings were held with the Prime Minister's Office to review overall progress in the implementation of the Reform Agenda, complemented by ministerial-level discussions. In this context, meetings between the Prime Minister's Office and Ministers responsible for Policy Area 1 (Business environment and Private sector development), Policy Area

2 (Green and digital transition), and Policy Area 4 (Fundamentals) took place on 13 and 24 October. These meetings focused on assessing the state of implementation and identifying any issues requiring political guidance or additional coordination.

In August, the Minister of European Integration convened a dedicated meeting on progress related to payment steps in the agricultural sector falling under Policy Area 1 – Business environment and Private sector development. The purpose of this meeting was to assess implementation challenges and ensure that sufficient institutional support and attention were allocated to the reforms in this sector.

At the coordination level, meetings between the State Secretary of the Ministry of European Integration and the coordinators of the respective Policy Areas were organized on a regular basis, with monthly coordination meetings taking place from September onwards. These meetings served to review progress, discuss outstanding issues, and align next steps across policy areas. Beyond regular correspondence, the National Coordinator Technical Secretariat organized a series of online and in-person technical meetings with line institutions responsible for payment steps with implementation deadlines in December 2024, June 2025, and December 2025. These meetings aimed to obtain detailed updates on implementation, clarify outstanding elements, and assess readiness in relation to the applicable deadlines. A comprehensive coordination meeting involving all policy area coordinators and relevant line institutions was held on 28 November. The objective of this meeting was to obtain an overview of progress across all steps, assess the likelihood of timely fulfilment, and identify steps requiring intensified follow-up. Furthermore, a targeted series of meetings was held on 15, 16, and 18 December with institutions responsible for steps due in December 2024, June 2025, and December 2025. Those meetings were organized by the Ministry of European Integration and Ministry of Finance. On 15 December, meetings were held with institutions responsible for steps under Policy Area 1, as well as with the Ministry of Interior in relation to steps under Policy Area 4. On 16 December, meetings focused on steps under Policy Areas 2.1 and 2.2, while on 18 December, meetings were held with the Ministry of Justice and the National Assembly concerning steps under Policy Area 4. These meetings enabled the NC TS to obtain more detailed and up-to-date information on the state of implementation, identify outstanding gaps in relation to the fulfilment of the relevant steps, agree on necessary follow-up actions with the competent institutions, and provide guidance aimed at preparing the institutions for the third payment request, including clarification of applicable technical requirements.

An online instructional training entitled “My role in the Reform Agenda” was organized on 25 December. The training was jointly delivered by representatives of the Ministry of European Integration, in its capacity as the Technical Secretariat of the National Coordinator, the Ministry of Finance - Central Harmonization Unit (CHU), the Anti-Fraud Coordination Service Unit in the Handling of EU Financial Resources (AFCOS), and the Governmental Audit Office for EU Funds. The training provided an overview of the key principles, processes, and expectations within the management and control system of the Reform Agenda of the Republic of Serbia. The objective of the training was to present, in a clear and practical manner, the roles of the involved institutions, as well as the necessary steps and measures related to implementation, monitoring, control, and reporting, in line with the requirements of the Reform and Growth Facility. Although participation was initially envisaged primarily for officials responsible for financial management and control and internal auditors within the institutions, the training also emphasized the importance of the

involvement of staff directly engaged in the implementation of payment-related steps, recognizing their role and contribution within the overall monitoring framework.

In addition to inter-institutional coordination with line institutions, structured exchanges were also organized with representatives of the European Commission, the Delegation of the European Union, and civil society stakeholders gathered in the National Convention for the European Union, in order to ensure transparency, inclusiveness, and alignment in the monitoring of the Reform Agenda implementation.

The first meeting of the Reform and Growth Facility Monitoring Committee was held on 2 October 2025. The meeting was attended by representatives of the line institutions of the Republic of Serbia, the European Commission, and the Delegation of the European Union, as well as representatives of civil society gathered within the National Convention on the European Union, representatives of EU Member States, international financial institutions, the private sector, and international organizations. During the meeting, progress in the implementation of the Reform Agenda across all policy areas was discussed, alongside issues related to monitoring mechanisms, audit and control, horizontal issues, WBIF investments, and matters concerning communication and visibility. In accordance with the Rules and Procedures of the Reform and Growth Facility Monitoring Committee, the Operational Conclusions and the Minutes of the Meeting, together with the supporting materials, were circulated among the members of the Monitoring Committee for comments and suggestions. All relevant comments and suggestions received were duly taken into account and reflected in the final versions of the documents, while in cases where proposals were not incorporated, explanations were provided, in line with the established format, purpose, and objectives of the Monitoring Committee.

Building on the discussions held at the Monitoring Committee meeting, two additional coordination meetings were organized. The first meeting, held on 14 November, brought together representatives of the institutions of the Republic of Serbia and the Delegation of the European Union, as well as representatives of the European Commission who participated online, with the objective of providing an update on implementation progress and addressing matters requiring further explanation. During the meeting, attention was drawn to certain payment steps where experience had shown that ambiguities could arise in the interpretation of fulfilment requirements, and clarification was therefore sought in order to support consistent understanding and timely implementation.

The second follow-up meeting took place on 1 December and involved representatives of the institutions of the Republic of Serbia, the European Commission and the Delegation of the European Union, as well as representatives of the National Convention on the European Union. The focus of this meeting was on steps with the potential to be achieved in time for submission with the Third Payment Request.

As a result of the discussions held on 1 December, it was agreed that the National Convention on the European Union would submit written comments and questions on the relevant steps. These comments were received on 15 December, and coordinated responses were provided by the competent institutions and transmitted back on 30 December.

In line with its mandate, the NC TS conducted a desk-based verification process throughout the reporting period, based on a twofold approach combining the review of publicly available information with the targeted collection of additional documentation and explanations from the competent authorities where deemed necessary.

The desk-based review was carried out in a particularly intensive manner in the period from 8 to 15 January, following the receipt of documentation packages submitted by the Policy Area Coordinators, including annexes, sources of verification, and supporting materials. During this period, members of the NC TS conducted a thorough examination of the submitted packages, including a comparison of the provided evidence against the mandatory sources of verification defined in Annex 1 of the Reform Agenda. Where gaps, inconsistencies, or missing elements were identified, supplementary documentation was requested or additional clarification was sought from the relevant authorities. The purpose of these checks was to confirm the implementation of individual steps and to assess the availability, relevance, and clarity of the supporting evidence, while any identified weaknesses were communicated back to the competent institutions and addressed through corrective measures or further clarification, as appropriate.

In light of the above, the checks and coordination activities undertaken during the reporting period demonstrate a consistent and structured approach to the verification of step-level implementation, grounded in transparency, inter-institutional cooperation, and continuous engagement with the competent national authorities. The approach reflects responsiveness to national commitments, as well as to the recommendations and requests of the European Commission and the National Convention on the European Union, and contributes to establishing a consistent understanding, among all relevant stakeholders, of the fulfilment criteria and supporting evidence required for the assessment of payment steps.

Fiche to be used for each step:

December 2024

Fiche No. 1

The step under review	Final inventory submitted in line with the European Commission's comments from March 2024
Baseline	State aid inventory adopted by the CSAC on February 9, 2024
Deadline of the step	December 2024
Actual results	- On the 29th November 2024 the Republic of Serbia sent to the EC 2nd draft State Aid Schemes Inventory (further: SA Inventory) updated with EC comments and requests on 1st draft SA Inventory; - On the 17th December 2024 the EC sent preliminary comments on the 2nd draft of the SA Inventory to the Republic of Serbia. The new EC requirements were to ensure that: (1) all schemes, as per the EU definition of a State-Aid scheme, are include in inventory (including individual aid measures, especially those that are more significant in terms of volume); (2) important economic sectors have been included in the SA Inventory; (3) description for most of the schemes in SA Inventory should be detailed with information if the Commission for State Aid Control (CSAC) assessed their compliance or not. - Following the EC's initial comments, representatives of the EC and the Republic of Serbia, on 10th January 2025 held an online meeting to discuss the feedback and agree on next steps; - Based on online meeting discussions, on 15th January 2025 the EC sent to the Republic of Serbia the two agreed operational conclusions: 1) the EC to share with Serbia its final technical comments (in addition to the preliminary comments) on the draft inventory and 2) in the meantime, Serbia to work towards finalizing the inventory by including missing or insufficient information on beneficiaries, objective of the aid, sectors, amounts etc. and by including all state-aid that could qualify as SA schemes under the EU definition; - On the 23rd January 2025 the Republic of Serbia sent to the EC an updated 3rd draft SA Inventory in accordance with EC comments, in which were added the scheme "Law on public media services" (scheme for granting aid to the public service broadcasters), the Republic of Serbia specified sectors for which state aid is granted for all schemes, listed an inventory of 59 individual aids which are ongoing and provides answers to all other EC technical comments;

- On the 13th February 2025 the EC provided the Republic of Serbia with additional comments and questions regarding the 3rd draft SA Inventory: The EC noted that the total amount of aid covered in the inventory is relatively small compared to the public data for state aid provided in Serbia in recent years. The Republic of Serbia should add more information to the SA Inventory about aid for transport, SGEIs/public services, mining and traditional energy production, R&D, and direct grants (tax measures, tax credits for R&D, start-ups, young workers). The EC requested more detailed information on certain state aid schemes (in the food sector) and specific individual state aid measures (in the mining industry). Finally, the EC pointed out the need to limit the duration of state aid schemes;
- Following the EC's comments, representatives of the EC and the Republic of Serbia **held and meeting in Belgrade on 25th February 2025** to discuss and agree on next steps;
- On the 10th March 2025 **the Republic of Serbia sent to the EC an updated 4th draft SA Inventory** in accordance with EC comments from 13th February 2025, which now covers a wider period, more schemes and individual measures.
- On the 19th March 2025 **the EC sent to the Republic of Serbia additional comments on 4th draft SA Inventory**. The EC noted that SA Inventory has been extended and provides more details and more schemes and measures, but certain sectors still lack included aid measures (schemes or individual aid). Examples include banking, energy storage, health, postal services, agriculture and fisheries sectors. The EC provided some answers about legal status of the JP PEU Resavica and about missed EIB measures in SA Inventory;
- On 15th April 2025 **the Republic of Serbia sent to the EC improved 5th draft SA Inventory** with accompanying answers to EC questions from 19th March 2025;
- On 27th May 2025 **the EC completed analysis of the 5th draft SA Inventory** and confirmed that this version provides more details than the earlier versions and addresses most of the ECs technical comments.
- On the 30th June 2025, **the Republic of Serbia sent to the EC the final version of the SA Inventory (2017-2025)**, which has been updated in close coordination with all relevant institutions. This version will serve as the basis for the preparation of the future Action plan.
- On 10th July 2025 the EC, via email, confirmed its acceptance of the SA Inventory as final
- On 10th July 2025 the Government of RS adopted the SA Inventory

The SA Inventory will be published after the EC officially confirms that this RA step is fulfilled

Evidence provided	Documentation submitted with the Second Payment Request, including documentation provided following requests for supplementary information: - The evidence is record of email correspondence between representatives of the European Commission and the Republic of Serbia - The Republic of Serbia sent the final version of the SA Inventory (2017–2025) (Excel table) to the European Commission. Evidence of this submission is provided through email correspondence between the Serbian Authorities (SA) and the European Commission.
Checks performed in the verification of the step and related findings	The MEI sent SA Inventory to all state aid grantors to verify that all state aid schemes are included in SA Inventory. The checks and verification of this step were carried out by the EC, throughout the process of SA Inventory's preparation. Working drafts of the SA Inventory the Republic of Serbia were submitted to the EC for their assessment and feedback. Subsequent to receiving comments from the EC, the Republic of Serbia undertook further alignment in accordance with the feedback received. For payment steps previously submitted, the checks performed were conducted and documented in the respective Payment Requests. Checks were continued throughout the current reporting period, ensuring ongoing monitoring and verification of implementation progress. In this context, the NC TS applied a step-specific verification approach, drawing on the meetings held during the reporting period. This approach enabled continued tracking of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	The step is pending European Commission formal assessment following its submission in the Second Payment Request. The Republic of Serbia submits this step as fully achieved in the Third Payment Request.

Fiche No. 2

The step under review	First composite step due by December 2024 (subject to ODIHR assessment as the verification mechanism): • WG composed in accordance with the ODIHR recommendation. The would mean inter-agency Working Group on Co-ordination and Follow-up of the Implementation of Recommendations for the Improvement of the Electoral Process should act in full transparency, with the inclusion of relevant stakeholders, such as civil society organizations. • A meaningful audit of voter register completed in accordance with ODIHR recommendations. This step means establishment of the Commission which will oversee and control voters register. The Commission should include representatives of opposition, as well as relevant civil society organizations. The implementation of this recommendation should be recognized/verified by ODIHR. • REM Council is re-elected (in line with the Law on electronic media) in a transparent and inclusive process. Clear explanation of this step is given in the relevant law.
Baseline	ODIHR February 2024 Report recommending to address as a matter of priority recommendations pertaining to REM, Voter Register and Working group
Deadline of the step	December 2024
Actual results	• Establish WG in line with ODIHR recommendation The Working Group was established on 29 April 2024. Eight meetings of the WG have been held so far (seven in 2024 and one in 2025). In the latest attempt to organise a meeting of the Working Group, representatives of the opposition and of civil society did not accept to participate. Apart from that, all WG members are regularly informed about activities, documents are submitted to them (draft laws and ODIHR opinions), they are invited to public hearings; however, representatives of the opposition and of civil society did not participate in the work of the WG. The latest meeting with representatives of civil society who participated in the work of the WG was with representatives of the CRTA Association, when drafting the latest version of the Draft Law on the Unified Voter Register, on 13 and 14 October 2025. Most of the provisions included in the final text of the Draft Law were included upon the direct proposal of this association and after consulting them. The resulting harmonised text of the Law was adopted by the National Assembly on 7 November 2025. Currently, additional efforts are being made to restore the functioning of the Working Group. • Conduct a thorough revision of the voter register according to ODIHR recommendations. The National Assembly adopted the Law Amending the Law on the Unified Voter Register on 7 November 2025.

	After the entry into force of this Law (on 15 November 2025), the Chair of the Committee on the Judiciary, Public Administration and Local Self-Government initiated the procedure for nominating candidates for members and substitute members of the Commission for Auditing, Verifying, and Controlling the Accuracy and Updating of the Voter Register (on 17 November 2025). At its sitting held on 29 December 2025, the Committee on the Judiciary, Public Administration and Local Self-Government established a List of Candidates for Members and Substitute Members of the Commission for Auditing, Verifying, and Controlling the Accuracy and Updating of the Voter Register. The Committee decided to submit the List of Candidates, under urgent procedure, to the National Assembly for decision. • Elect a new REM Council (in line with the Law on Electronic Media) through a transparent and inclusive procedure On 12 November 2025, the National Assembly of the Republic of Serbia adopted a Decision electing eight out of nine members of the Council of the Regulatory Authority for Electronic Media (REM). The Culture and Information Committee immediately initiated the procedure for electing the ninth member of the REM Council, nominated by National Councils of National Minorities as authorised nominators. At its sitting held on 23 December 2025, after holding a public hearing it organised on the topic "Public Interview with Nominated Candidates for Members of the Council of the Regulatory Authority for Electronic Media" and conducting an interview with the candidates, the Culture and Information Committee decided to submit to the National Assembly, under urgent procedure, a report and the List of Candidates for members of the REM Council nominated by authorised nominators National Councils of National Minorities, along with CVs and statements accepting the nomination, in order to ensure the smooth functioning of this authority. On 19 December 2025 four members of the REM Council resigned, prompting the Culture and Information Committee to adopt, at its sitting held on 29 December 2025, a Decision on initiating a new procedure for nominating candidates for the members of the Council of the Regulatory Authority for Electronic Media upon the proposal of the authorised nominator associations of journalists in the Republic of Serbia, associations of film, stage and drama artists and associations of composers in the Republic of Serbia, associations aimed at the exercise of freedom of expression and associations aimed at protecting children.
Evidence provided	Further information on achieving this implementation stage: - http://www.parlament.gov.rs/upload/archive/files/cir/pdf/zakoni/14_saziv/2147-25.pdf - http://www.parlament.gov.rs/upload/archive/files/cir/pdf/ostala_akta/14_saziv/RS48-25.pdf
Checks performed in the verification of	In the second composite sub-step: Consultations were held with ODIHR, which on several occasions provided informal opinions on the Draft Amendments to the Unified Voter Register Law.

the step and related findings	The NC TS continues to follow the implementation of this step in line with its respective implementation stage. The NC TS regularly monitors progress and requests updates from the institutions responsible for implementation. The progress of these steps is discussed in the meetings described in the section “Summary of checks performed”.
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 3

The step under review	The three following laws are adopted, following consultations with the Commission: The law on electronic media and the law on public information and media are amended to align fully with the EU acquis and Council of Europe’s standards; a new law on public service media is adopted in line with the media strategy, the EU acquis and Council of Europe’s standards.
Baseline	The Law on Public Information and Media and the Law on Electronic Media were harmonized and adopted in October 2023 and they will be amended in certain domains with the latest EU framework. The new Law on Public Service Media will be harmonized with new EU media instruments and standards.
Deadline of the step	December 2024
Actual results	On June 16, the National Assembly adopted the Law on Amendments to the Law on Electronic Media, the Law on Amendments to the Law on Public Broadcasting Services, and the Law on Amendments to the Law on Public Information and Media.
Evidence provided	Documentation submitted with the Second Payment Request, including documentation provided following requests for supplementary information: - Link to <i>National Assembly of the Republic of Serbia adopted laws on June 16, 2025</i>

Checks performed in the verification of the step and related findings	The new Law on Public Information and Media and the Law on Electronic Media were adopted on October 2023. After adoption the mentioned laws, European Commission had several suggestions, and in order to achieve fully harmonization with EU acquis and European standards, after six months of intensive communication with European Commission, the Law on Public Information and Media as well as the Law on Electronic Media were amended on June 16 2025. Also, the Law on amendments to the Law on Public Broadcasting Services was adopted on June 16 2025. These amendments to the media laws represent significant progress in terms of governance, transparency, and accountability in the media sector. The adoption of these laws is an important step towards the further improvement of the media environment in the Republic of Serbia, as well as the further implementation of the media strategy. For payment steps previously submitted, the checks performed were conducted and documented in the respective Payment Requests. Checks were continued throughout the current reporting period, ensuring ongoing monitoring and verification of implementation progress. In this context, the NC TS applied a step-specific verification approach, drawing on the meetings held during the reporting period. This approach enabled continued tracking of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The implementation status was also discussed at two Policy Area 4 technical meetings held on 16 and 18 December, where representatives of the line institutions presented the progress achieved. Other relevant meetings informing this assessment are described in the section “Summary of checks performed”.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	The step is pending European Commission formal assessment following its submission in the Second Payment Request. The Republic of Serbia submits this step as fully achieved in the Third Payment Request.

Fiche No. 4

The step under review	Following consultations with the Commission, the Anti-Corruption strategy and action plan for 2025-2028 are adopted
Baseline	The Strategy is adopted and the Action plan is in the drafting phase.
Deadline of the step	December 2024
Actual results	The National Anti-Corruption Strategy 2024-2028 was adopted by the Government of the Republic of Serbia on July 25th 2024 (Official Gazette of the Republic of Serbia number: 63/24). The new Strategy for the fight against corruption aims for strengthening existing and creating new systemic solutions for preventing corruption at all levels and raising awareness of the harmfulness of corruption as well as creating conditions for more effective detection, prosecution and sanctioning of criminal offences, with continuous implementation and upgrade of existing anti-corruption mechanisms. It is mostly related to the twelve risk areas: Education, Health, Taxes, Customs, Local self-government, Public sector management, Public enterprises, Police, Privatization, Construction and infrastructural planning, Financing of political parties and Public procurement. The Action Plan for the period 2024-2025, aimed at implementing the National Anti-Corruption Strategy 2024-2028, was adopted on December 26th 2024. During preparation of both documents, the European Commission was consulted and draft versions were provided for feedback. At the end of July 2025, a Working Group for the development of the Action Plan for the period 2026-2028 was formed. The initial meeting of the Working Group was held on 25th July 2025. The second meeting of the Working Group was held on September 4th and 5th 2025. Call for contributions related to the future work on the Action Plan for the period 2026-2028 the Ministry of Justice announced on August 22nd, 2025. The Ministry of Justice ensured that the drafting of the Action Plan was conducted in accordance with the principles of transparency, inclusiveness and broad public consultation. Accordingly, an invitation was addressed to all interested parties - representatives of institutions, the professional and scientific, public, civil society organizations and citizens, to submit their suggestions, proposals and initiatives related to the Draft Action Plan for the period 2026-2028, taking into account the National Anti-corruption Strategy for the period 2024-2028. The public debate on the Draft Anti-Corruption Action Plan was held from 24th September to 13th October 2025. The translated Draft of the Anti-Corruption Action Plan was sent to the European Commission on 12th November 2025. The adoption of the Action Plan for the period 2026-2028 is expected for the 1st quarter 2026.

Evidence provided	Documentation already submitted with the First Payment Request: - The National Anti-Corruption Strategy 2024-2028 was adopted by the Government of the Republic of Serbia on July 25th 2024 and published in the Official Gazette of the Republic of Serbia number: 63/24 https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/strategija/2024/63/1/req - For the adopted Action Plan hereby is link of the MoJ web page where both version, Serbian and English, have been published: https://www.mpravde.gov.rs/sr/tekst/39384/nacionalna-strategija-za-borbu-protiv-korupcije-za-period-od-2023-2028-godine-.php Ministry of Justice made public call for the drafting the Action plan for the period 2026-2028: https://www.mpravde.gov.rs/sr/obavestenje/11245/poziv-za-dostavljanje-priloga-u-vezi-sa-buducim-radom-na-akcionom-planu-za-period-2026-2028-godine-za-sprovedjenje-nacionalne-strategije-za-borbu-protiv-korupcije-za-period-2024-2028-godine.php <i>*Please note that website of Ministry of Justice is under construction.</i> Additional evidence for the Third Payment Request: - Ministry of Justice announced a call for contributions related to the future work on the Action Plan for the period 2026-2028: https://ekonsultacije.gov.rs/topicOfDiscussionPage/519/3 - The public debate on the Draft Anti-Corruption Action Plan: https://ekonsultacije.gov.rs/topicOfDiscussionPage/537/1
Checks performed in the verification of the step and related findings	For payment steps previously submitted, the checks performed were conducted and documented in the respective Payment Requests. Checks were continued throughout the current reporting period, ensuring ongoing monitoring and verification of implementation progress. In this context, the NC TS applied a step-specific verification approach, drawing on the meetings held during the reporting period. This approach enabled continued tracking of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”. The implementation status of this payment step was discussed in depth at a Policy Area 4 technical meeting held on 18 December.

Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved

June 2025

Fiche No. 5

The step under review	The level of transparency regarding all projects contracted under intergovernmental agreements is increased by introducing project-specific information on the website of the ministry in charge of implementing the project on any completed, ongoing and new procurement contracts under intergovernmental agreements. All contracts under intergovernmental agreements will be published starting from December 2024 and this practice will be maintained in the following years for all new contracts: including: name of the project; basic procurement contract information; contracting authority; main contractor and procurement procedure followed.
Baseline	There is no obligation to publish project-specific information on contracts under intergovernmental agreements, however some project-specific information on contracts under intergovernmental agreements are published
Deadline of the step	June 2025
Actual results	In order to fulfil this step Republic of Serbia implemented following activities: December 2024 – Web sites of different ministries have been screened for purpose of identification of requested project information. It was concluded that the Ministry of Construction, Transport and Infrastructure has been publishing regularly information on different projects at its web-site, but further activities are needed to complete the list.

	January 2025 - The letter and accompanying form containing necessary information for publishing relevant data on websites of competent ministries were prepared, and sent to all ministries. End of February 2025 - Ministries and special organisations submitted completed forms to the Ministry of Finance, and nominated contact points for follow up purposes. During March 2025 – The Ministry of Finance reviewed submitted inputs, organised a number of meetings and consultations with relevant ministries, and concluded that only G2G agreements from these institutions correspond to the RA request: Ministry of Construction, Transport and Infrastructure, Ministry of Mining and Energy and Ministry of Finance. April and May 2025 – Requested additional data have been prepared and published on the websites of 3 ministries that reported projects contracted under international agreements. During June 2025 – Revision of published data, after consultations with the Ministry of Finance and comments of European Commission. End of June 2025 – Revised data were published on the websites of relevant ministries. Final list of projects with relevant web links was checked against requirements of RA and completed. The final list contains 41 project, out of which 32 projects of the Ministry of Construction, Transport and Infrastructure, 5 projects of the Ministry of Mining and Energy and 4 projects of the Ministry of Finance. October 2025 – The Ministry of Finance has sent a request to all institutions to submit information on whether, by the end of 2025, any new projects implemented within the framework of intergovernmental agreements are planned or being implemented within the scope of their responsibilities. If such projects exist, the institutions were instructed to publish information on these projects on the websites of the competent ministries, in line with established practice. At the same time, the list of contact persons responsible for matters related to projects implemented within the framework of intergovernmental agreements has been updated. January and February 2026 - Information on new or planned projects implemented within the framework of intergovernmental agreements was revised. Three new projects are included in the list and relevant information is published on websites of ministries in charge of implementation of mentioned agreements – Ministry of Finance and Ministry of Construction, Transport and Infrastructure.
Evidence provided	Documentation already submitted with the Second Payment Request, including documentation provided following requests for supplementary information: - All data available on websites of the ministries in charge of implementing the projects.

	- List of all the identified projects with corresponding links to the websites of the ministries containing required data as defined in the step. - Updated list of the identified projects with corresponding links to the websites of the ministries containing required data
Checks performed in the verification of the step and related findings	For payment steps previously submitted, the checks performed were conducted and documented in the respective Payment Requests. Ministries in charge of implementing the projects have published relevant data on their websites and submitted them to the Ministry of Finance, as sub coordinator for the policy area Business environment and private sector development of the Reform agenda. Ministry of Construction, Transport and Infrastructure already had majority of the projects published on their website before the required initial date (December 2024), so only some projects have been added during the period December 2024 - June 2025, as well as projects of the Ministry of Energy and Mining and the Ministry of Finance. Ministry of Finance, as sub-coordinator, has verified that all the information requested in the RA can be found on web-links provided by the ministries. The Ministry of Finance performed numerous checks of availability and validity of requested information in the course of implementation of the RA until prescribed deadline for implementation of this step - as described in Actual results. A special revision meeting has been held on 2 July 2025, attended by the representatives of Ministry of European Integration, as the National coordinator for RA, and Ministry of Finance, as the sub-coordinator for the policy area Business environment and private sector development, that confirmed that requested information on all identified projects has been published on websites of competent ministries. During October, November and December 2025, the Ministry of Finance has revised contact points from all relevant institutions and has gathered data on new or planned projects implemented within the framework of intergovernmental agreements and preformed checks of data provided from institutions. No new or planned projects implemented within the framework of intergovernmental agreements were implemented from June 2025 until January 2026. Checks were continued throughout the current reporting period, ensuring ongoing monitoring and verification of implementation progress. In this context, the National Coordinator Technical Secretariat applied a step-specific verification approach, drawing on the meetings held during the reporting period. This approach enabled continued tracking of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The

	relevant meetings informing this assessment are described in the section “Summary of checks performed”.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	The step is pending European Commission formal assessment following its submission in the Second Payment Request. The Republic of Serbia submits this step as fully achieved in the Third Payment Request.

Fiche No. 6

The step under review	A time-bound action plan for alignment of state aid schemes with the EU acquis, based on a final inventory, is adopted and approved by the European Commission
Baseline	No time-bound AP
Deadline of the step	June 2025
Actual results	The main prerequisite for completion of the step A time-bound Action Plan for alignment of state aid schemes with the EU acquis, based on a final inventory, is adopted and approved by the European Commission is completion of the previous step - Submitted final State Aid Schemes Inventory in accordance with the comments of the European Commission from March 2024, planned for December 2024 (the inventory was agreed with the European Commission in late June 2025). This specially because agreed Inventory is the basis for the completion of the Action Plan. The Republic of Serbia fulfilled this step by implementing following activities: - Numerous meetings and consultations with all the relevant partners were held to ensure alignment of the Action Plan with the State Aid Inventory during March and April 2025. - The first draft of the Action Plan, agreed with the all the relevant stakeholders, was prepared and sent to the European Commission on 28th of April.

	- European Commission sent comments to the first draft of the Action Plan in May. - The Draft Action Plan for alignment of state aid schemes has been supplemented by requested information during May and June. - The Draft Action Plan has been completed until 30 June, and it has been translated and professional editing of the translation has been finalised in the coming days. - On 3 July 2025, the final version of the Action Plan was submitted to the European Commission. - On 25th July the EC submitted its comments on the proposed Action Plan - The finalization of the Action plan in accordance with the EC comments is underway
Evidence provided	Documentation submitted with the Second Payment Request, including documentation provided following requests for supplementary information: - Final Action Plan submitted to the European Commission on July 3rd 2025.
Checks performed in the verification of the step and related findings	For payment steps previously submitted, the checks performed were conducted and documented in the respective Payment Requests. Consultations between the Republic of Serbia (represented by MEI as a Technical Secretariat of National Coordinator and Commission for State Aid Control and the Ministry of Finance) and the European Commission on the finalisation of the Action Plan were held in the period from May until July, 2025. Checks were continued throughout the current reporting period, ensuring ongoing monitoring and verification of implementation progress. In this context, the NC TS applied a step-specific verification approach, drawing on the meetings held during the reporting period. This approach enabled continued tracking of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.

Clear conclusion on the achievement of the step	The step is pending European Commission formal assessment following its submission in the Second Payment Request.
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Fiche No. 7

The step under review	The number of funded researchers/innovative companies in the National Innovation System (Supported by Science Fund and Innovation Fund programs) is increased to 3400/600
Baseline	3288/505 (March 2024)
Deadline of the step	June 2025
Actual results	As presented in the Clarification (September 2025) submitted to NITRA, a total of 619 innovative companies were supported by the Innovation Fund. However, after applying EU double-funding rules, 589 innovative companies are counted toward the step indicator out of the targeted 600. The indicator has been achieved at a level of 98.17%. A report on the implementation of public calls by the Innovation Fund is anticipated in the first half of 2026. The report will encompass the public calls under the Co-Investment AI Grant Katalitik (58 applications received, evaluation ongoing), the Acceleration Program - Katapult (128 applications received, evaluation ongoing), and the ExpoTech Program (92 applications received, evaluation ongoing) and GovTech Program (60 applications received, evaluation ongoing). These calls are expected to finance approximately an additional 60 innovative companies in total, thereby fully fulfilling the target defined by the step indicator of at least 600 innovative companies.
Evidence provided	Documentation submitted with the Second Payment Request, including documentation provided following requests for supplementary information: - Report on the Implementation of Innovation Fund Public Calls (December 2011–June 2025) dated June 2025 This report was published on the web site of the Innovation Fund on June 2025 and is publicly available via the following links: Direct link to the document: https://www.inovacionifond.rs/cms/files/iv-akti/20250610_Report%20on_the_Implementation_of_IF_Public_Calls.pdf

	Link to the page where the document is published: https://www.inovacionifond.rs/cir/o-fondu/dokumenti-i-akti/izvestaj-o-radu - Clarification on the Number of Innovative Companies Supported was sent on September 2025 by the Innovation Fund to NITRA
Checks performed in the verification of the step and related findings	For payment steps previously submitted, the checks performed were conducted and documented in the respective Payment Requests. Checks were continued throughout the current reporting period, ensuring ongoing monitoring and verification of implementation progress. In this context, the National Coordinator Technical Secretariat applied a step-specific verification approach, drawing on the meetings held during the reporting period. This approach enabled continued tracking of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”. The implementation status of this payment step was additionally discussed at a Policy Area 1 technical meeting held on 15 December, where representatives of the line institutions presented the progress achieved.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were identified in support of the achievement of this step. Clarification has been submitted to the European Commission in September 2025.
Clear conclusion on the achievement of the step	The step is pending European Commission formal assessment following its submission in the Second Payment Request.

Fiche No. 8

The step under review	One certified Serbian TSO operates the whole gas transmission system in Serbia.
Baseline	Energy Law in force last updated in July 2023 providing legal basis
Deadline of the step	June 2025

Actual results	Significant progress has been achieved in certifying and operationalizing Transportgas Srbija as a gas transmission system operator and in establishing related infrastructure agreements. The initial certification was adopted by the AERS on 25 July 2024 and submitted to the Energy Community Secretariat, which issued a positive opinion on 21 November 2024. The final certification was adopted on 21 March 2025, and a usage permit for the Serbia - Bulgaria Interconnector was issued on 14 January 2025. Ongoing activities include: the system usage agreement between Jugorosgaz and Transportgas Srbija, which is pending bilateral negotiations; the licensing of Transportgas Srbija to operate infrastructure owned by JP Srbijagas and Jugorosgaz, submitted to AERS on 25 August 2025; and the establishment of Gas Infrastructure LLC - Novi Sad on 4 December 2025, following decisions by JP Srbijagas and prior Government approval. Completion of these activities depends on the successful outcome of negotiations with Jugorosgaz and related licensing procedures.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	Ministry of Mining and Energy regularly ensures that the step is fulfilled in accordance with the applicable rules, a thorough desk-based review was carried out to examine all relevant documents and regulations.
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 9

The step under review	Third-party access to gas infrastructure is in place
Baseline	Energy Law provides legal basis and Rules on the Operation of the Transport System submitted to the Energy Agency of the Republic of Serbia by "Transportgas Srbija" for approval

Deadline of the step	June 2025
Actual results	Significant progress has continued in the operationalization of Transportgas Srbija as a gas transmission system operator. In February 2025, the company adopted the Rules on the Operation of the Transport System, which received formal consent from the Energy Agency of the Republic of Serbia (AERS), marking a key regulatory milestone. The public call for contracting annual continuous capacity was issued on 6 and 13 June 2025, covering interconnection and other system points for gas years Y+1 to Y+5. This represents an essential step for implementing open market principles and ensuring third-party access to the transport network. Ongoing activities focus on the completion of metering station installations, connection to the existing system, and enabling system users to access metering data. Investment decisions have been made for the construction of stations at the border points Horgoš and Banatski Dvor, with €20 million allocated to each location. Equipment has been ordered abroad, with 50% of funds already paid for project preparation and procurement. Construction works at the border points and within the Banatski Dvor underground storage are underway, with preparatory steps ongoing, including obtaining the construction permit and awaiting the auditor's report for Horgoš. In parallel, the project-technical documentation has been updated: while PPS Trupale was initially designated as the commercial gas transfer point for the Serbia–Bulgaria interconnection, a new project assignment issued by PE Srbijagas now includes PPS Kalotina and the interconnection point with North Macedonia as interstate interconnection points (IP). The Gas Law, adopted by the National Assembly on 3 December 2025, has established the legal framework necessary to finalize the unbundling of gas sector activities. The process of functional and operational unbundling is ongoing, and the establishment of Gas Infrastructure LLC – Novi Sad has marked the start of the unbundling process within the gas sector.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	Ministry of Mining and Energy regularly ensures that the step is fulfilled in accordance with the applicable rules, a thorough desk-based review was carried out to examine all relevant documents and regulations.
Compliance with general principles and DNSH principle	N/A
Double funding	N/A

Clear conclusion on the achievement of the step	Not achieved
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Fiche No. 10

The step under review	Allocation of capacities at Horgos and IBS border points is opened
Baseline	Rules on the Operation of the Transport System submitted to the Energy Agency of the Republic of Serbia by "Transportgas Srbija" for approval
Deadline of the step	June 2025
Actual results	The activities related to announcing and allocating available transmission capacities at the Horgoš and IBS interconnection points have been implemented in accordance with the newly adopted Rules on the Operation of the Natural Gas Transmission System. In particular, Chapter 25, item 25.4 stipulates the obligation of the Transmission System Operator (TSO) to publish and allocate capacities via the Regional Booking Platform (RBP) no later than the start of the gas year on 1 October 2026, in line with applicable EU network codes. Until the RBP becomes fully operational, capacity allocation has been conducted through the Transportgas Srbija operational platform. A dedicated web interface (https://kp.transportgas-srbija.com) has been developed, integrated with the TSO's adapted database, and made publicly accessible for system users. Through this platform, the public call for annual capacity contracting at interconnection points, including Horgoš and IBS, has been published in accordance with the ENTSO-G capacity allocation calendar. For the gas year starting 1 October 2025, annual, monthly, and daily capacities are being allocated via this system. The platform provides: • Public visibility of available capacities for each entry/exit point by gas day; • Publication of annual, monthly, and daily capacity calls; • Electronic submission and processing of booking requests; • Equal access to information for all registered system users. Access to the allocation process has been supported through several transparency-enhancing measures: • Open registration procedures for all interested system users; • Timely processing of new user registration requests; • Publication of detailed user guidance materials on the TSO website; • Direct assistance to prospective users seeking system access.

	In practice, the number of registered system users has remained stable, while additional registration requests have been received and processed. For example, in August 2025, two formal inquiries were submitted through legal representatives of prospective clients. These requests were addressed without delay, and comprehensive instructions for participation in the allocation process were provided through the platform and supporting documentation. A publicly available user manual further facilitates participation by explaining registration steps, booking procedures, and system functionalities, thereby lowering administrative and technical barriers to market access. Implementation of the Regional Booking Platform represents the next phase in the development of the allocation system. Progress to date includes: • The RBP procurement procedure is completed on 5 February 2026; • Availability of a test (demo) version of the platform; • Ongoing employee training for platform operation; • Technical and administrative preparations for full deployment. Quarterly and intraday capacity products will be allocated via the RBP no later than 1 October 2026, in accordance with the platform's operational rules. The system is expected to be fully operational as of March 2026. With the forthcoming transition to the RBP, the allocation framework is advancing further toward full regional integration, while maintaining a structured, visible, and accessible process for all potential system users.
Evidence provided	https://kp.transportgas-srbija.com https://www.transportgas-srbija.rs/sr/pristup-sistemu/uputstvo-za-korisnike-transportnog-sistema - Reports submitted by the implementation partner institution Transportgas Srbija d.o.o. Novi Sad
Checks performed in the verification of the step and related findings	For payment steps previously submitted, the checks performed were conducted and documented in the respective Payment Requests. Checks were continued throughout the current reporting period, ensuring ongoing monitoring and verification of implementation progress. In this context, the National Coordinator Technical Secretariat applied a step-specific verification approach, drawing on the meetings held during the reporting period. This approach enabled continued tracking of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”. To ensure that the step is fulfilled in accordance with the applicable rules, a thorough desk-based review was carried out by Ministry of Mining and Energy to examine all relevant documents and regulations. In addition, a series of meetings with key stakeholders was organized, providing a platform for discussing findings, clarifying ambiguities, and ensuring alignment with the requirements.

Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	The step is pending European Commission formal assessment following its submission in the Second Payment Request. The Republic of Serbia submits this step as fully achieved in the Third Payment Request.

Fiche No. 11

The step under review	New legislative framework is adopted, notably: a new Law on suppression and prevention of THB by Parliament; criminal code is amended in order to criminalise effectively the trafficking of weapons, in line with the provisions of the Convention on transnational organised crime and firearms protocol; adoption of a new Law on weapons and ammunition, in line with EU acquis
Baseline	In order to address a challenges in the field of fight against organized and serious crime. Serbia needs to improve its normative framework. By amendments of the Law of the THB, following the adoption and implementation of the previously adopted Programme and AP for the fight against THB, Serbia will establish a comprehensive system in this field, involved with all relevant competent authority. In order to align its national legislation with acquis, Serbia will adopt the new Law on Weapons and Ammunition, following the implementation of the existing Law. In order to effective criminalise trafficking of weapons, Serbia will amend the existing article, within the Criminal Code.
Deadline of the step	June 2025
Actual results	After consulting with the European Commission and receiving their consent, the document is prepared for the national procedure before its adoption at the Government session and subsequently by the National Assembly.

Evidence provided	N/A
Checks performed in the verification of the step and related findings	N/A
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 12

The step under review	Following consultations with the Commission, new strategic document and accompanying Action Plan *(2025-2030) for the control of Small arms and light weapons (SALW) in line with the provisions of the revised Regional SALW Roadmap for Western Balkans are adopted
Baseline	Republic of Serbia strategic framework in the area of SALW is in place. However, it is necessary to develop new strategic document in the area of SALW, bearing in mind that the current one is ending by the end of the 2024, and also taking into consideration that the revised SALW Regional Roadmap will be adopted by June 2025
Deadline of the step	June 2025
Actual results	Adopted on December 26, 2025
Evidence provided	- Act of the Ministry of Human and Minority Rights and Social Dialogue (002887487 2024 13410 006 000 012 002 01 005, 01.011.2024.) - Decision on the establishment of the Working Group for the development of a draft program for the control of small arms and light weapons, ammunition and explosives and the accompanying Action Plan (01 Number: 02-7-47/24-2, December 04, 2024) - Report on the results of the consultative process

	- Report on the conducted public debate - Opinion of SEESAC - Opinion of the European Commission - Act of the Ministry of Interior for the General Secretariat of the Government RS (01 Number -021-367/25-96, December 22, 2025.) - Official Gazette of the Republic of Serbia No.No.119/2025, December 29, 2025
Checks performed in the verification of the step and related findings	For each payment step assessed as fully achieved, the National Coordinator Technical Secretariat applied a tailored verification approach, building on the structured technical and coordination meetings held during the reporting period. This approach allowed for step-specific attention to be devoted to the assessment of implementation progress, the interpretation of fulfilment requirements, and the adequacy of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”. In the course of implementation of the payment step related to the strategic framework on Small Arms and Light Weapons (SALW), the translated draft strategic document was transmitted to the European Commission on 25 September for comments and suggestions, as part of the established consultative process. On 29 October, the European Commission confirmed that it had no further comments beyond the comprehensive assessment already provided by SEESAC. The NC TS carried out a desk-based review of the documentation package submitted for this payment step. This review included a comparison of the submitted materials against the mandatory sources of verification defined in Annex 1 of the Reform Agenda, as well as a review of publicly available documents related to the SALW policy framework. The results of these checks were used to confirm the completeness and consistency of the supporting evidence underpinning the assessment of the payment step as fully achieved.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

Fiche No. 13

The step under review	The Law on internal affairs addressing the issue of police autonomy from the Ministry of Interior during pre-investigation and investigation phases and recommendations from the Committee for Prevention of Torture is adopted
Baseline	Adoption the new Law on Internal Affairs states that one of the tasks of the Ministry of the Interior is to provide conditions for the prevention of torture and degrading procedures and the control of police actions towards persons deprived of their liberty, with the implementation of the CPT recommendations. Also, the Law will ensure that the police have operational autonomy from the Ministry.
Deadline of the step	June 2025
Actual results	The adoption of the Law on Internal Affairs is currently under the jurisdiction of the Ministry of Internal Affairs. A working group was established on May 22, 2025, to further refine the provisions of the law, building on the initial draft created by a previous working group formed in October 2024. The current draft, which is still being coordinated with the Ministry of Internal Affairs, representatives of trade unions, and the Criminal Police University, includes several important provisions for the European Commission. These provisions focus on ensuring the operational independence of the police and implementing the standards set by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT). Additionally, it incorporates recommendations from the fifth evaluation cycle of the Group of States Against Corruption of the Council of Europe (GRECO). The working group meets once a week to finalize the draft law as quickly as possible. The aim is to submit this working version to the European Commission for review, along with an explanatory memorandum, while also initiating the consultation process and subsequent public hearings. A draft law has been prepared. After consultations and public debate, the document will be submitted to the European Commission for its opinion.
Evidence provided	N/A
Checks performed in the verification of	N/A

the step and related findings	
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 14

The step under review	A new strategic document and accompanying action plan that covers counter terrorism and all forms of radicalization and violent extremism (irrespective of political, religious or ethno-nationalist so-called justification) are adopted in line with EU policies, including envisaging concrete steps to prevent recruitment and participation of Serbian citizens as foreign fighters and to prosecute returning foreign fighters returned to Serbia
Baseline	Republic of Serbia more than two years do not have a Strategic document for counter terrorism and violent extremism. Meanwhile, Serbia adopted the report on the implementation of previous strategic document in this area for 2017-2021 and developed study on all forms of radicalisation and violent extremism. Republic of Serbia signed the Joint Action plan on Counter Terrorism for the Western Balkans in 2018 and bilateral arrangement for the implementation of Joint Action plan in order to align its policies with the best practice within the EU. This two national documents together with the findings from the implementation of the Joint Action plan will be the baseline for the preparation of the new strategic document in the area of CT/PVE. The new strategic document in the area of CT/PVE will provide robust framework for countering terrorism and preventing/countering violent extremism; to contribute to the improvement of institutional set up and legal alignment; to create framework for the improvement of the implementation and enforcement capacity; to create framework for the protection of critical infrastructure and citizens and to create and improve the capacities for information exchange and operational cooperation.

Deadline of the step	June 2025
Actual results	The working group has successfully finalized the document, carefully incorporating feedback and ensuring all details are accurate. This comprehensive document has now been officially submitted to the European Commission, where it will undergo thorough review and consideration. The third round of consultations with the European Commission is underway regarding the submitted comments.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	N/A
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

December 2025

Fiche No. 15

The step under review	Changes in the Rules of Procedure of the Government so that the decision to conduct a public hearing, the program of the public hearing and the deadline for its implementation are determined by the Government, instead of a competent committee, upon the proposal of the proponent
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Baseline	Rules of Procedure where decision to conduct a public hearing, the program of the public hearing and the deadline for its implementation are determined by a competent committee, upon the proposal of the proponent
Deadline of the step	December 2025
Actual results	Amendments to the Rules of Procedure of the Government have been adopted. The Working Group for Amending the Legal Framework for Consultations and Public Debates was formed on November 1, 2024, by decision of the Director of the Republic Secretariat for Public Policies, based on the Government Conclusion. The working group includes representatives of relevant state administration bodies: • Ministry of State Administration and Local Self-Government, • Republic Secretariat for Legislation, • General Secretariat of the Government, • Ministry of Human and Minority Rights and Social Dialogue, • Ministry of European Integration, • Ministry of Environmental Protection, • Ministry of Construction, Transport and Infrastructure, • Office for Information Technology and Electronic Governance, • Chamber of Commerce of Serbia and • Republic Secretariat for Public Policies, as well as representatives of civil society organizations selected through a public call in accordance with the Guidelines for the Inclusion of Civil Society Organizations in Working Groups for the Preparation of Proposals for Public Policy Documents and Drafts, or Draft Regulations: • European Policy Center, • Standing Conference of Cities and Municipalities, • Center for Democracy Foundation and • Belgrade Open School. As of November 13, 2025, a total of four sessions were conducted, during which a substantive and productive discussion was held on all issues of importance for improving the situation in the area. The emphasis was on the analysis of all relevant options in order to simplify the legal framework for consultations and public debates, in accordance with the previous experience and recommendations of SIGMA and the European Commission.

	The first concrete result of the Working Group is the amendment of the Government's Rules of Procedure in accordance with the obligations from the Reform Agenda. Specifically, Article 41g stipulates that the conclusion on the implementation of a public debate for regulations and public policy documents, the public debate program and the deadlines within which it is implemented, is adopted by the Government instead of the competent Committee. In addition to the discussion at the meetings on the draft of this document (prepared by the Republic Secretariat for Legislation), all members of the working group had the opportunity to submit their proposals, comments and suggestions on the working text on several occasions, electronically. In this way, transparency in the work was ensured, with equal conditions for the participation of all institutions and civil society organizations. The working group continues its work, when the discussion will continue on the topic of further amendments to the relevant regulations and improvements to the legal framework in the subject area.
Evidence provided	- “Official Gazette of the Republic of Serbia”, No. 106/25 of 28 November 2025. - General Secretariat of the Government web site: https://gs.gov.rs/tekst/1408/odluka-o-izmenama-i-dopunama-poslovnika-vlade.php - Government web site: https://www.srbija.gov.rs/dokument/2432/poslovnik-vlade.php
Checks performed in the verification of the step and related findings	<i>ANALYSIS OF COMMENTS AND SUGGESTIONS RECEIVED AFTER AND DURING THE PROCEDURE FOR THE ADOPTION OF THE RULES OF PROCEDURE</i> 1. SUBSEQUENT COMMENTS RECEIVED FROM PARTICIPANTS IN THE WORKING GROUP – CEP, BOŠ AND THE CENTRE FOR DEMOCRACY It was noted in the response to the subsequent comments that the Decision on the web portal <i>eKonsultacije</i> enables the participation of the entire public in the consultation process and that its use by state administration bodies is mandatory. Furthermore, it was emphasized that stakeholders are not determined by the authority conducting the consultations; rather, their status is articulated through their own independent and voluntary actions, by which they themselves create and influence their position in the consultation process. 2. SUBSEQUENT COMMENTS RECEIVED FROM SIGMA AND IN THE ACCOMPANYING LETTER After once again consulting the text of the Reform Agenda, we have reaffirmed that the only explicit obligation related to the Rules of Procedure of the

Government is set out on page 62 of the document, which indicates the need for decisions on public consultations to be made by the Government, instead of sectoral Government committees. Another identified requirement on the same page relates to consultations; however, the deadline for its implementation is set for 2027. Therefore, in this context, it may be considered that the assumed obligation has been fulfilled through the adopted amendments to the Rules of Procedure.

At the same time, we emphasize that the amendments to the Rules of Procedure have not established lower standards for the conduct of public consultations compared to those previously set by the Rules of Procedure prior to the amendments. By way of example, certain provisions have been improved, such as the extension of the deadline for submitting comments and suggestions and the possibility of consolidating reports, etc. The most important amendment is that the Government will make the decision on the public debate, which will have more impact on a proposer to have a public debate.

As regards the linking of consultations and public hearings into a single process and the rules on successfully conducted consultations, these are solely intended to clearly identify situations in which there are no disputed or open issues, rather than to establish lower standards. The exclusion of the use of the proposer's website in favour of the *eKonsultacije* web Portal is not possible without amendments to the law, as legislation clearly recognizes the use of such websites.

Notwithstanding the implementation of the obligation under the Agenda, and taking into account the subsequent comments, we firmly maintain the position that further improvements in the directions indicated are necessary. Accordingly, the competent authorities, together with partners from the civil sector, will continue to consider these issues within the framework of the established Working Group.

We express our satisfaction that certain positive aspects of the amendments to the Rules of Procedure have been recognized in the submitted comments and proposals. At the same time, we express concern that, when viewed in their entirety, all comments may be addressed only through amendments to related regulations, and not solely through amendments to the Rules of Procedure. Therefore, this may justifiably be regarded as a significantly broader approach to the existing issues than that expressed in the Agenda, which will be the subject of further work of the Working Group (continued work on related regulations in terms of preparing their amendments).

We would also like to point out that the subsequent interpretation of the requirements from the Agenda differs somewhat from the wording of the Agenda itself. Namely, when considering the text of the Agenda, it appears to lead to the conclusion that the Government should decide on the conduct of

public consultations, rather than deciding only in exceptional cases when a public consultation is not conducted, as subsequently proposed. The text of the Agenda reads as follows:

*“The implementation of this part of the reform will be measured in two steps:

1. Amend the Rules of Procedure of the Government so that the decision on conducting a public consultation, the public consultation programme, and the deadline for its implementation are adopted by the Government, instead of the competent committee, upon the proposal of the proposer (November 2025).”

In this regard, it is not proper interpretation that, by omitting a Government decision on the conduct of a public consultation, the public consultation would lose its prerogatives and effectively be “absorbed” into the consultation process, which would be managed independently by the proposer. The Government, as stated in the new text of the Article 41. para. 8. the Government will have much more power over how the public debate is conducted.

However, this will be a matter for further consideration in the continuation of the work.

Competent authority expressed the readiness to send a formal communication to proposers, even at this “working” stage during the preparation of amendments to regulations related to the Rules of Procedure, clearly stating that successfully conducted consultations encompass only those cases in which no unaccepted comments remain, or where no comments were submitted at all. Furthermore, there is also readiness to issue a recommendation that proposers place a link that serves as a quick, clear, and easily visible connection to the web portal eKonsultacije, in order to facilitate its use at this stage of the process as well.

For each payment step assessed as fully achieved, the National Coordinator Technical Secretariat applied a step-specific verification approach, drawing on the structured technical and coordination meetings held throughout the reporting period. This approach ensured focused assessment of implementation progress, a clear understanding of fulfilment requirements, and verification of the adequacy and consistency of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”.

In relation to this payment step, a follow-up exchange was held after the Monitoring Committee meeting with the Delegation of the European Union and the European Commission, during which questions were raised concerning the scope and content of the amendments to the Rules of Procedure of the

	Government. As part of the consultative process, the amendments were subsequently communicated to the European Commission on 17 November. In parallel, the NC TS conducted a desk-based review of the documentation package submitted for this payment step. The review confirmed that the mandatory documentation, as defined in Annex 1 of the Reform Agenda, had been duly provided and was available for verification purposes.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

Fiche No. 16

The step under review	Full alignment with the European Research Infrastructure Consortium (ERIC) Regulation is reached
Baseline	Not fully aligned
Deadline of the step	December 2025
Actual results	Full alignment with the European Research Infrastructure Consortium (ERIC) Regulation has been achieved through the adoption of amendments to the Law on Science and Research (Official Gazette of the Republic of Serbia No. 49/2019 and 108/2025), which fully transpose the provisions of EU Regulation No. 723/2009.
Evidence provided	- Amendments to the Law on Science and Research (Official Gazette of the Republic of Serbia No. 49/2019 and 108/2025) adopted on 3 December 2025. - Full English translation of the Law on Science and Research.
Checks performed in the	For each payment step assessed as fully achieved, the National Coordinator Technical Secretariat applied a step-specific verification approach, based on the

verification of the step and related findings	technical and coordination meetings held during the reporting period. This approach enabled a focused review of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”. In the course of implementation, questions concerning the scope of the amendments to the Law on Science, aimed at ensuring full alignment with the European Research Infrastructure Consortium (ERIC) Regulation, were raised during a follow-up exchange after the Monitoring Committee meeting. As part of the consultative process, the translated amendments, together with the Table of Concordance, were transmitted to the European Commission for review on 27 November. In parallel, the Ministry of European Integration provided its opinion on the draft law in the framework of the applicable regulatory procedure. Additional verification was ensured through structured exchanges with civil society at a meeting held on 1 December with the National Convention on the European Union. The exchanges provided an additional perspective on the progress achieved in the implementation of this reform, and the written feedback subsequently received reflected a positive assessment of that progress.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

Fiche No. 17

The step under review	At least 10 projects financed from the national budget, not exceeding EUR 299,999 per project, contracted under public calls aimed to improve rural public infrastructure in the areas of water supply and road infrastructure facilities.
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Baseline	Law on Incentives in Agriculture and Rural Development and Rulebook on Incentives for Investments for the Improvement and Development of Rural Public Infrastructure in force
Deadline of the step	December 2025
Actual results	The Ministry of Agriculture, Forestry and Water Management undertook the following activities in order to achieve the stated step: 1. Rulebook on Subsidies for Investments in the Improvement and Development of Rural Public Infrastructure was amended and published on 9 May 2025 ("Official Gazette of the RS", Nos. 97/23, 99/23, 57/24 and 41/25). 2. Public call for subsidies for investments in the construction and equipment of facilities: for water supply and road infrastructure was published on the official website of the Directorate for Agrarian Payments on 12 May 2025 (https://uap.gov.rs/wp-content/uploads/2023/11/Javni-poziv-.pdf). 3. The total available funds under this Public Call are set at 400,000,000 dinars (€3.413.630,46)¹. 4. The highest total amount of subsidies that a user can receive under the Public Call is 35,000,000 dinars (€298.692,66)². 5. The Commission for the implementation of the evaluation and scoring procedure for submitted applications for the exercise of the right to subsidies for investments for the improvement and development of rural infrastructure for 2025 conducted the evaluation and scoring procedure for submitted applications. Ranking list with a proposal for approval of subsidies for 16 projects that do not exceed the amount of 299,999 euros per project and whose goal is to improve rural public infrastructure in the areas of water supply and road infrastructure was published on 12 July 2025 on the official website of the Directorate for Agrarian Payments. 6. By 1 October 2025, approximately 400.000.000 dinars (€3.413.851,87)³ were disbursed (17beneficiaries/projects). Following the publication of the public call and the implementation of the procedure for the payment of subsidies for the improvement of rural public infrastructure, subsidies were approved for 17 local self-government units.

¹ NBS average exchange rate RSD/EUR: on 4 July 2025 - 1 EUR = 117,1773RSD;

² NBS average exchange rate RSD/EUR: on 4 July 2025 - 1 EUR = 117,1773RSD;

³ NBS average exchange rate RSD/EUR: on 1 October 2025 - 1 EUR = 117,1697RSD;

	The decision stipulates that the investment must be completed within 365 days from the date of receipt of the decision. Investment activities are underway in 11 municipalities, while in 6 municipalities no implementation activities have taken place. The beneficiary of the incentive, i.e. the local self-government, is obliged to fully implement the investment under the conditions, in the manner, and within the timeframe specified in the decision granting the right to the incentive, and to submit to the Directorate for Agrarian Payments the documentation proving the realization of the approved investment within that period. The Directorate for Agrarian Payments is monitoring whether the implementation of the investment is proceeding in accordance with the Rulebook and issued decision. According to the records of the Directorate for Agrarian Payments as of 26 January 2026, works have been completed in 3 municipalities (Petrovac na Mlavi, Sombor and Mladenovac). A contract with the selected bidder has been concluded in 7 municipalities (Ub, Mionica, Mali Iđoš, Lajkovac, Bač, Kraljevo and Krupanj).
Evidence provided	Additional evidence for the Third Payment Request: - Ranking list available on the website of the Directorate for Agrarian Payments (https://uap.gov.rs/wp-content/uploads/2023/11/Bodovna-lista.pdf) 1. Local Self-government of Petrovac na Mlavi • Contract Asphaltting of Streets in Burovac • Final payment certificate 2. Local Self-government of Sombor • Contract for the Public Procurement of Works - Rehabilitation of Asphalt Base for the Public Road — Kralja Petra I street - Stapar • Final payment certificate 3. Local self-government Mladenovac • Contract for the Execution of Rehabilitation Works on Agricultural District Roads with Stone Base • Final payment certificate 4. Local Self-government of Ub • Contract for the Procurement of Works PP No. 0034/2025 – Reconstruction and Construction of Water Supply System along Svete Popovića Street in Ub 5. Local Self-government of Mionica • Contract for the Public Procurement of Works – Installation of a Central Water Supply Surveillance and Management System in Mionica 6. Local Self-government of Mali Iđoš

	• Contract for the Public Procurement of Works – Road Surface Construction in Feketić 7. Local Self-government of Lajkovac • Public Procurement Contract for Works: Construction of an Uncategorised Road in Čelije-Jevtići 8. Local self-government of Bač • Contract for the Public Procurement of Works: Road – Rehabilitation Works on the Streets of Settlements in the Municipality of Bač 9. Local self-government Kraljevo • Decision on Contract Award • Contract for the Procurement of Works – Reconstruction and Construction of 1400 Metres of Water Supply Network in Vitanovac and Čukojevac (Leg 1) • Decision on the Appointed Engineer to Survey the Performance of the Works on Reconstruction and Construction of 1400 metres of Water Supply Network in Vitanovac and Čukojevac – Leg 1 10. Local self-government Krupanj • Decision on the Implementation of the Public Procurement Procedure • Report on Bid Opening • Contract for the Execution of Construction Works to Reconstruct the Water Supply Network in Krupanj – Phase I
Checks performed in the verification of the step and related findings	For each payment step assessed as fully achieved, the National Coordinator Technical Secretariat applied a dedicated verification approach, informed by the meetings held during the reporting period. This approach enabled a targeted review of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”. In relation to this payment step, sector-specific oversight was reinforced through a ministerial-level meeting held in August, focusing on the agricultural sector. The objective of this meeting was to assess implementation challenges and to ensure that adequate institutional support and attention were dedicated to the reforms relevant to this payment step. In addition, targeted correspondence was conducted, followed by a dedicated meeting held at the Delegation of the European Union, with the aim of clarifying the requirements for this payment step to be considered fulfilled, including the documentation to be used for verification purposes. As a joint conclusion of this exchange, it was agreed that all relevant documentation related to the implementation stages of the projects would be submitted on an ongoing basis in order to substantiate progress in implementation.

	As part of the verification process, the NC TS carried out a desk-based review to confirm that all relevant documentation for the ten projects covered by this payment step had been submitted and was available in English for verification purposes. The review confirmed that the required documentation had been duly provided.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	The step is pending European Commission formal assessment following its submission in the Second Payment Request. The Republic of Serbia submits this step as fully achieved in the Third Payment Request.

Fiche No. 18

The step under review	Competent authority [for the implementation of the rules of the ETS Directive] approves monitoring plans [in line with national legislation that transposes the Commission Implementing Regulation [EU] 2018/2066 [MMRR]]
Baseline	Legislation that transposes MRVA acquis recently adopted: Law on Climate Change (“Official Gazette of the RS”, No 26/21), Regulation on types of activities and greenhouse gases („Official Gazette of the Republic of Serbia“, No. 13/2022), Rulebook on the verification and accreditation of verifiers of reports on greenhouse gas emissions („Official Gazette of the Republic of Serbia“, no. 107/21), Rulebook on the monitoring and reporting of greenhouse gas emissions ("Official Gazette of the Republic of Serbia“, no. 118/23) or 0 GHG permits issued (GHG permit is an act by which the Competent Authority approves the Monitoring Plan.
Deadline of the step	December 2025
Actual results	The Ministry of Environmental Protection, as the Competent Authority, established a system for monitoring, reporting, verification and accreditation (MRVA) and issues GHG permits to operators of stationary installations, on the

basis of their approved monitoring plans and in line with following national legislation:

- LAW ON CLIMATE CHANGE (“Official Gazette of the RS”, No 26/21)
- RULEBOOK ON MONITORING AND REPORTING OF GREENHOUSE GAS EMISSIONS (“Official Gazette of RS,” No. 118/23), adopted on December 19, 2023 - transposes (EC) 2018/2066 on the monitoring and reporting of greenhouse gas emissions
- RULEBOOK ON THE VERIFICATION AND ACCREDITATION OF VERIFIERS OF REPORTS ON GREENHOUSE GAS EMISSIONS (“Official Gazette of RS” No. 107/21), adopted on November 4, 2021 - transposes Regulation (EC) 2018/2067 on data verification and accreditation of verifiers
- REGULATION ON TYPES OF ACTIVITIES AND GREENHOUSE GASES (“Official Gazette of RS,” No. 13/22), adopted on February 3, 2022 (transposes Annex I of the EU Emissions Trading System Directive)

Chapter IV of the Law on Climate Change, inter alia, prescribes rules for monitoring, reporting and verification of GHG emissions from installations, including conditions for starting the installation’ operation, application for issuing the GHG permit, consideration of application, assessment of the environmental protection agency, content of the GHG emission permit as well as its revision, modification and termination; with regards monitoring and reporting, Law on Climate Change includes provisions on the monitoring plan, changes to the monitoring plan, provisions on simplified monitoring plan, implementation of the changed monitoring plan, GHG emissions monitoring methodologies, assessment of the implementation of a particular monitoring methodology, data management and control including keeping documents and data, reporting, conservative assessment of GHG emissions, reporting on the monitoring methodology improvement; as well as verification and accreditation including provisions on report verification, accreditation issues, application for accreditation, assessment of verifiers, assessment team, obligations of the verifier, programme for supervision over the work of verifiers, administrative measures and notification on the scope of accreditation of verifiers, as well as objection to the verifier.

Regulation on types of activities and greenhouse gases („Official Gazette of the Republic of Serbia“, No. 13/2022), prescribes types of activities and greenhouse gasses, for which the operator of an installation shall obtain the GHG emissions permit, and aviation activities and greenhouse gases, for which it is not necessary to submit a monitoring plan, in line with Annex I of the EU ETS Directive.

Provisions on monitoring and reporting for stationary installations are operationalized through Rulebook on Monitoring and Reporting of Greenhouse Gas Emissions (“Official Gazette of RS,” No. 118/23) which prescribes: the content of the monitoring plan, written procedures and supporting

documentation to be submitted with the monitoring plan; reasons for amending the monitoring plan, significant amendments to the monitoring plan, content of the records on amendments to the monitoring plan; conditions that an installation must meet in order to be considered an installation with low greenhouse gas emissions as well as conditions, activities, procedures, control methods and necessary documentation that must be submitted so that the operator can use the simplified monitoring plan; methodologies for monitoring GHG emissions from the installation and conditions for their application; method of assessing the technical feasibility and unjustifiably high costs of applying a particular monitoring methodology; content of written procedures for collecting and using data for monitoring and reporting on emissions and the control system; minimum data and documents that the operator is obliged to keep; form and content of the GHG emissions report, type and method of obtaining data on historical activity levels and GHG emissions from those activities; deadlines for submitting and content of reports on improvements to the monitoring methodology; method and form of submitting applications for issuing a GHG emission permit and its amendment, notifications of intended changes to the type of activity, changes in the capacity of existing installations and construction of new ones on the site, changes in fuels and main raw materials used in the installation, monitoring plans for installations, notifications of amendments to the monitoring plan, applications for approval of the use of a simplified monitoring plan, reports on GHG emissions from installations and reports on improvements to the monitoring methodology.

According to the Law on Climate Change, Accreditation Body of Serbia is responsible for accreditation of verifiers. Provisions on accreditation and verification are operationalized through Rulebook on the Verification and Accreditation of Verifiers of Reports on Greenhouse Gas Emissions ("Official Gazette of RS" No. 107/21) which prescribes requirements to be met by verifiers, verification processes and criteria, content of the verification reports; data relevant for the assessment of competence for carrying out the verification, assessment of the verification process as well as determining if the verifiers meet the requirements; requirements as regards the composition of the assessment team, competence of assessors who perform the assessment of verifiers, i.e. team leader, team member and the person taking the decision on whether to grant, extend or renew the accreditation, as well as requirements to be met by technical experts whom the Accreditation Body of Serbia can include in the assessment team; form and content of the report on the work programme implementation. Accreditation Body of Serbia holds international recognition under the EA-MLA and has accredited five verification bodies, in line with SRPS EN ISO/IEC 17029:2020 and SRPS EN ISO 14065:2022.

With the entry into force of the Rulebook on Monitoring and Reporting, the obligation to obtain a greenhouse gas emissions permit for operators of stationary installations in Serbia has begun in January 2024, in accordance with the Law on Climate Change ("Official Gazette of RS," No. 26/21).

	To facilitate the process of submitting permit applications and supporting documentation (including the monitoring plan) and to improve communication between operators, the competent authority, and verifiers - the Ministry of Environmental Protection has developed a digital online platform (e-GHG platform), accessible via the Ministry's website. The e-GHG platform also integrates all EC Excel tables and provides operators with guidelines and instructions, all adapted from EU to Serbian context. Additionally, the eGHG platform includes a Register of Issued Permits which provides public information on the operator, installation, GHG emission permit number and permit issue date. Since January 2024 - when the obligation to submit request for GHG permits officially started after entering into force of the Rulebook on Monitoring and Reporting of Greenhouse Gas Emissions, Ministry of Environmental Protection issued 95 GHG emission permits, with the obligations for the operators to surrender their Annual Emission Report by 31 March 2026, for 2025 and every year thereafter. To support implementation of MRVA and ensure that all stakeholders are prepared in a timely manner, Ministry of Environmental Protection has organized numerous trainings for operators, the Accreditation Body of Serbia, and potential verifiers.
Evidence provided	Website of the eGHG platform hosted on the website of the Ministry of Environmental Protection https://e-GHG-portal.ekologija.gov.rs/ - List of participants of training workshops for operators - List of five PDF files: 1) Participant's list for training of operators for Law on Climate Change held on 24 January 2024 titled: Step 2_7.1.6_MRV Training_24.01.2024.pdf 2) Participant's list for training on the use of eGHG platform held on 3 November 2023 titled: Step 2_7.1.6_MRV Training_03.11.2023.pdf 3) Participant's list for training on the use of eGHG platform held on 6 November 2023 titled: Step 2_7.1.6_MRV Training_06.11.2023.pdf 4) Participant's list for training of operators held on 15 April 2024 titled Step 2_7.1.6_MRV Training_12.04.2024.pdf 5) Participant's list for training of operators held on 15 April 2024 titled Step 2_7.1.6_MRV Training_15.04.2024.pdf - Screenshot of the webpage of eGHG platform where Register of issued permits is hosted and can be accessed (File title: Step 3_Screenshot of eGHG Register.JPG) - MRVA legislation: LAW ON CLIMATE CHANGE ("Official Gazette of the RS", No 26/21), RULEBOOK ON MONITORING AND REPORTING OF GREENHOUSE GAS EMISSIONS ("Official Gazette of RS," No. 118/23), adopted on December 19, 2023 - transposes (EC) 2018/2066 on the monitoring

	and reporting of greenhouse gas emissions, RULEBOOK ON THE VERIFICATION AND ACCREDITATION OF VERIFIERS OF REPORTS ON GREENHOUSE GAS EMISSIONS (“Official Gazette of RS” No. 107/21), adopted on November 4, 2021 - transposes Regulation (EC) 2018/2067 on data verification and accreditation of verifiers, and REGULATION ON TYPES OF ACTIVITIES AND GREENHOUSE GASES (“Official Gazette of RS,” No. 13/22), adopted on February 3, 2022 (transposes Annex I of the EU Emissions Trading System Directive) with accompanying Tables of Concordance.
Checks performed in the verification of the step and related findings	The verification process was initiated on 9 July with a technical meeting with representatives of the Ministry of Environmental Protection, during which the applicable legislation was reviewed, including its interaction with the relevant rulebooks. During this meeting, the online platform used for monitoring greenhouse gas emitters was examined, confirming that the required information is publicly available. Considering that the accompanying regulations and Tables of Concordance were not submitted to the European Commission, and as a preventive measure, this payment step was therefore not included in the Second Payment Request. The MRVA legislation and accompanying ToC were sent to the EC on 28 November 2025. For each payment step assessed as fully achieved, the National Coordinator Technical Secretariat applied a tailored verification approach, drawing on the technical and coordination meetings held during the reporting period. This approach facilitated a focused examination of implementation progress, supported a consistent interpretation of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”. The implementation status and remaining challenges were additionally discussed at a Policy Area 2 technical meeting held on 16 December, where representatives of the Ministry of Environmental Protection presented the progress achieved and potential risks. In line with this, it was decided that, when submitting the payment request, particular attention will be paid to the challenges previously identified, which will be carefully reviewed once again. In line with Law on Climate Change (“Official Gazette of the RS”, No 26/21), Ministry of Environmental Protection is the Competent Authority for issuance of GHG permits to operators of stationary installations, with Serbian Environmental Protection Agency providing technical assistance in checking the monitoring plans of operators of stationary installations. In accordance with the Law on Climate Change and accompanying secondary legislation, prior to starting the operation of the installation, operators of stationary installations submit requests for GHG emission permit, together with accompanying documentation including the Monitoring plan, via the eGHG platform, which means that the process is completely digitalized. Existing

	operators were given a six-month deadline for submission of the GHG permit application. In line with deadlines prescribed by the Law on Climate Change, Ministry of Environmental Protection first checks the completeness of the request submitted by the operator into the eGHG platform, and within five days from the date of receipt of the complete application for the issuance of a permit, submits it, together with the monitoring plan, to the Serbian Environmental Protection Agency (SEPA). SEPA assesses the submitted monitoring plan and accompanying technical documentation, and within a maximum of two months from the date of receipt of the documents, submits to the Ministry a report assessing whether the monitoring plan has been prepared in accordance with the regulations and whether the installation operator is able to provide monitoring and reporting on GHG emissions in accordance with Law on Climate Change. When assessing the monitoring plan, the Agency may request the applicant to submit additional information that the applicant failed to provide in the monitoring plan or if some of the submitted information in the monitoring plan are not stated, are contradictory or not sufficiently precise according to regulatory requirements. Communication between CA, SEPA and operators is done within the eGHG platform, via dedicated chat function. In line with Law, Ministry issues a GHG emission permit within a maximum of four months from the receipt of a complete application for issuing the permit, based on the positive assessment of SEPA. Information on received GHG emission permits is available in the Register of issued permits hosted on the eGHG platform. So far, Ministry issued 95 GHG emission permits.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were reported in support of the achievement of this step. The TC NC examined the nature of third-party contributions and, in accordance with the European Commission’s Guidance Note on Double Funding, concluded that the third-party support does not constitute double funding.
Clear conclusion on the achievement of the step	Fully achieved

Fiche No. 19

The step under review	Designation of a single contact point in line with the RED II Directive
Baseline	Renewables Law adopted. The Law provides a basis for guarantees of origin and prosumers, but not for permitting.
Deadline of the step	December 2025
Actual results	The Republic of Serbia has completed the establishment of a Single Administrative Contact Point for renewable energy projects, in line with EU best practices and the objectives of the Renewable Energy Directive. In October 2025, the competent authority adopted a formal decision to establish a Single Administrative Contact Point. This was operationalized through the signing of an Agreement on the establishment and functioning of a Single Contact Point for a pilot renewable energy project - a 1 GW solar power plant - between the Ministry of Mining and Energy, the Ministry of Construction, Transport and Infrastructure, and the Ministry of Environmental Protection. In December 2025, a functional Single Contact Point was established and became operational. Serbia opted for a phased implementation approach, whereby the first phase focuses on strategic renewable energy projects while the digital platform is being developed and tested. A dedicated webpage was created on the official website of the Ministry of Mining and Energy to provide information, guidance, and procedural support to applicants. During this initial phase, the Single Contact Point receives electronic inquiries, provides guidance on permitting procedures, directs applicants to the relevant electronic systems and competent authorities, and informs them of statutory deadlines. The 1 GW solar power plant has been designated as the pilot project for this phase. The scope of the Single Contact Point will be gradually expanded to cover additional renewable energy projects following future amendments to the Law on the Use of Renewable Energy Sources, with the objective of achieving full alignment with the Renewable Energy Directive.
Evidence provided	- Agreement on the establishment and operation of the Contact Point for projects in the field of renewable energy sources (pilot project – solar power plant with an installed capacity of 1 GW); - https://www.mre.gov.rs/tekst/13906/jedinstvena-kontakt-tacka.php (Serbian); - https://www.mre.gov.rs/tekst/en/84/single-contact-point.php (English)
Checks performed in the verification of	For each payment step assessed as fully achieved, the National Coordinator Technical Secretariat applied a tailored verification approach, drawing on the technical and coordination meetings held during the reporting period. This

the step and related findings	approach facilitated a focused examination of implementation progress, supported a consistent interpretation of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”. In relation to this payment step, a desk-based review was conducted by the Ministry of Mining and Energy in order to verify compliance with the applicable regulatory framework and to examine the relevant documentation supporting fulfilment. Progress in the implementation of this payment step was subsequently discussed through structured exchanges with civil society representatives at the meeting held with the National Convention on the European Union on 1 December. The written comments received on 15 December referred, inter alia, to the phased approach applied by the Republic of Serbia in the implementation of this payment step. In parallel, the NC TS carried out its own desk-based verification, based on the evidence submitted by the Ministry of Mining and Energy. This included a review of the links provided to the official website where information on the RED II contact point is published. The NC TS verified the availability, validity, and functionality of both the Serbian and English language versions of the webpage, as well as the accessibility of the related links leading to the relevant supporting documents.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

Fiche No. 20

The step under review	The EPBD is implemented: recast of minimum energy performance standards for non-residential buildings and setting nearly zero energy building standards for new buildings, issuing of EPC in line with EPBD; independent control systems for EPC and inspection reports for heating and cooling systems.
Baseline	CREP system is operational

Deadline of the step	December 2025
Actual results	Regarding the activities related to the sub-step under the jurisdiction of the Ministry of Construction, Transport, and Infrastructure, the majority of actions required to achieve this step are directly dependent on the improvement of the National Methodology for the Calculation of Energy Performance of Buildings and are ongoing. Out of 15 planned activities within this sub-step, 5 have already been completed, and the remaining work is planned to be finished in the first half of 2026. With respect to the activities under the jurisdiction of the Ministry of Mining and Energy (MoME), this sub-step has been successfully completed, with MoME authorizing economic operators to carry out inspections of heating and cooling systems in line with the Energy Performance of Buildings Directive. By 19 September 2025, MoME had issued formal authorizations to three operators: - DOO ZA PROIZVODNJU, EXPORT-IMPORT GASTEC VRŠAC, - METRO ENERGY DOO ZA INŽENJERING NOVI SAD, - Komunalno preduzeće Dimničar AD, Belgrade. These operators are officially authorized to perform inspections, and have been registered in the Registry of Persons Authorized for Heating and Cooling System Inspections (official registry maintained by the Ministry of Mining and Energy – https://www.mre.gov.rs/). In addition, MoME has established a functional system for submitting inspection requests and reporting results electronically, ensuring that all inspection reports are collected, stored, and managed in accordance with the Law and relevant by-laws (electronic system for submitting and storing inspection reports, maintained by MoME).
Evidence provided	N/A
Checks performed in the verification of the step and related findings	N/A
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the	Not achieved

achievement of the step	
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Fiche No. 21

The step under review	The establishment of the Just Transition governance process in accordance with the adopted Just Transition Action Plan and Just Transition Fund for Serbia is established with the financial support of the European Union [via the Reform and Growth Facility] and potentially other donors
Baseline	First NECP adopted
Deadline of the step	December 2025
Actual results	The Republic of Serbia has successfully established the Just Transition governance process in accordance with the adopted Just Energy Transition Plan and the framework of the Just Energy Transition Fund for Serbia, with financial support from the European Union through the RGF and potentially other donors. In July 2025, the Government of the Republic of Serbia adopted the Just Energy Transition Plan of the Republic of Serbia until 2030. The Plan was approved at the Government session held on 24 July 2025 and published on the official website of the Ministry of Mining and Energy, thereby providing a strategic and policy basis for the implementation of the just transition process. In December 2025, the institutional governance structure for the just energy transition was formally established. This included the establishment of an Inter-ministerial Government Committee responsible for overseeing and coordinating the just transition process, a Cross-sectoral Working Group tasked with the implementation of planned activities, and a dedicated Just Transition Unit within the Ministry of Mining and Energy. The establishment of these bodies was formalized through Government and ministerial decisions. Support for the operationalization and functioning of the governance structure has also been secured within the Ministry of Mining and Energy. The Cross-sectoral Working Group includes representatives of relevant institutions as well as civil society organizations. In this context, a public call for civil society participation was published on the official websites of the Ministry of Mining and Energy and the Ministry for Human and Minority Rights and Social Dialogue. Furthermore, in December 2025, the institutional framework for the Just Transition financing mechanism was established through the adoption of a decision on the use of funds from the current budgetary reserve, published in the Official Gazette of the Republic of Serbia. Based on the above, the Republic of Serbia has completed the establishment of the Just Transition governance process, ensuring a structured, inclusive, and

	operational framework for the implementation of just transition policies and measures.
Evidence provided	- Just Energy Transition Plan of the Republic of Serbia Until 2030 (ENG & SRB) - Government decision No: 312-7419/2025-2, dated 24 July 2025 - The Just Energy Transition Plan (ENG & SRB) - Government decision No: 02-14603/2025 (Official Gazette of the Republic of Serbia, No: 118/2025, 26 December 2025) - Decision on the establishment of the Interministerial Government Committee for managing the just energy transition process (ENG & SRB) - Decision of the Ministry of Mining and Energy No: 4817680 2025 14820 010 000 000 011, dated 23 December 2025 - Decision on the Establishment of an Interministerial Working Group (ENG & SRB) - Publication of the public call for civil society participation on the official websites of the Ministry of Mining and Energy (https://www.mre.gov.rs/tekst/14080/-javni-poziv-organizacijama-civilnog-drustva-za-ucestvovanje-u-radu-medjuresorne-radne-grupe-za-uspostavljanje-procesa-upravljanja-pravednom-energetskom-tranzicijom.php) and the Ministry for Human and Minority Rights and Social Dialogue (https://minljmpdd.gov.rs/javni-poziv-organizacijama-civilnog-drustva-za-ucestvovanje-u-radu-medjuresorne-radne-grupe-za-uspostavljanje-procesa-upravljanja-pravednom-energetskom-tranzicijom/) including: • Public call text (ENG & SRB) • Application form (ENG & SRB) • Overview of implemented programs/projects for the period from November 2020 to November 2025 (ENG & SRB) • Overview of published publications for the period from November 2020 to November 2025 (ENG & SRB) • Declaration on acceptance of candidacy and absence of conflict of interest (ENG & SRB) - ANNEX I to the contract on the performance of temporary and occasional work, Number: 004701494 2025 14820 002 000 101 001; - Government decision No: 401-14714/2025 (Official Gazette of the Republic of Serbia, No: 118/2025, 26 December 2025) - Decisions on the use of the current budget reserve funds (ENG & SRB)
Checks performed in the verification of the step and related findings	For each payment step assessed as fully achieved, the National Coordinator Technical Secretariat applied a dedicated verification approach, informed by the technical and coordination meetings held during the reporting period. This approach enabled a targeted review of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant

	meetings informing this assessment are described in the section “Summary of checks performed”. In relation to this payment step, a desk-based review was carried out by the Ministry of Mining and Energy to verify compliance with the applicable regulatory framework and to examine the documentation supporting fulfilment. In parallel, the Ministry of European Integration provided its opinion on the relevant documents in the framework of the applicable regulatory procedure. Progress in the implementation of this payment step was subsequently discussed through structured exchanges with civil society representatives at the meeting held with the National Convention on the European Union on 1 December. Written comments received on 15 December raised issues related to participation in the development of the Just Transition Diagnostics and the Just Transition Action Plan. These issues were addressed by the Ministry of Mining and Energy, and the corresponding responses were transmitted on 30 December. Prior to the submission of the payment request, the NC TS conducted its own desk-based verification based on the evidence submitted by the Ministry of Mining and Energy. This verification included a review of the documentation package received, including confirmation that English translations were provided for documents submitted in Serbian.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

Fiche No. 22

The step under review	Serbia is aligned with the Gigabit Infrastructure Act through the adoption of the Law on Broadband infrastructure by the National Parliament
Baseline	Law on Broadband not adopted
Deadline of the step	December 2025

Actual results	The New Law on Measures to Reduce the Cost of Deploying Very High Capacity Electronic Communications Networks, aiming at full alignment with the Gigabit Infrastructure Act, was drafted. Public consultations on the Draft Law were conducted in the period from September 17 to October 6, 2025, and comments received from stakeholders were assessed and incorporated where appropriate. Draft Law was submitted to the European Commission in mid-October, and the process of harmonization with the EC is underway. Upon the completion of the harmonization process with the EC, the Ministry of Information and Telecommunications will proceed with the law adoption procedure.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	N/A
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 23

The step under review	Serbia has joined the EU Third Countries trusted list for the validation of electronic signatures as advanced electronic in the EU as a first step towards pursuing mutual recognition of qualified trust services
Baseline	Serbia is not member of the EU Third Countries trusted list for the validation of electronic signatures as advanced electronic in the EU
Deadline of the step	December 2025
Actual results	The Republic of Serbia submitted an official request to join the EU Third Countries trusted list for the validation of electronic signatures as advanced

	electronic signatures in the EU at the beginning of the year. Subsequently, a series of meetings were held with representatives of the European Commission aimed at facilitating Serbia's access to this list. As the final step in the process, in December the Ministry submitted the Article 14 assessment checklist to the European Commission, which was then reviewed, with comments provided, and these comments were subsequently discussed orally at a meeting with the European Commission representatives. During this meeting, the need to amend and align certain secondary regulations was highlighted. Accordingly, the Ministry proceeded with the drafting and amendment of several bylaws to align them with the eIDAS regulation and relevant standards, in order to meet the conditions for joining this list. After the amendments to the secondary regulations are completed, the Ministry will submit them to the European Commission, after which a decision on Serbia's accession to the said list is expected.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	In order to achieve this step, the submission of the Article 14 assessment checklist was reviewed, together with the comments received from the European Commission, as well as the subsequent oral discussions during the meeting with the Commission representatives. The Ministry of Information and Telecommunication has proceeded with drafting and amending the relevant secondary regulations in line with eIDAS requirements and applicable standards, to align the national framework with the conditions necessary for joining the EU Third Countries trusted list. The National Coordinator Technical Secretariat continues to follow the implementation of this step in line with its respective implementation stage. The NC TS regularly monitors progress and requests updates from the institutions responsible for implementation. The progress of these steps is discussed in the meetings described in the section "Summary of checks performed".
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 24

The step under review	Compliance with the EU digital identity Regulation and eIDAS Regulation is achieved through the adoption of the amendments of the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business [or a new law depending on % of amendments] by the National Parliament
Baseline	Amendments of the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business not adopted
Deadline of the step	December 2025
Actual results	The Ministry of Information and Telecommunications has continued activities on the Draft Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business, aimed at aligning with the EU framework and introducing a digital wallet to simplify citizens electronic identification. Due to the large number of proposed amendments, it was decided that a completely new law will be adopted instead of a law on amendments and supplements. Several meetings of the Working Group have been held to review comments and proposals as part of the preparation of the Draft Law. Based on the Decision of the Government of the Republic of Serbia of 26 December 2025, the Ministry has initiated the public consultation, running from 26 December 2025 to 19 January 2026. The Draft Law is available to the public through the Ministry's website and the eConsultation Portal and interested parties can submit their comments and suggestions. After the public consultation, the Ministry will review all received comments, submit the Draft Law to the European Commission for an opinion, and subsequently proceed with adoption through the Government procedure and later in the National Assembly.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	In order to achieve this step, progress was made by reviewing activities related to the preparation of the Draft Law, including records of the Working Group meetings and the initiation of the public consultation in accordance with the Government Decision. The Draft Law has been prepared, the public consultation is ongoing within the defined timeframe, and the process is being implemented in line with the procedures set out in the Reform Agenda. As the legislative procedure has not yet been completed, this step has not been fully achieved at this stage. The National Coordinator Technical Secretariat continues to follow the implementation of this step in line with its respective implementation stage. The NC TS regularly monitors progress and requests updates from the institutions responsible for implementation. The progress of these steps is

	discussed in the meetings described in the section “Summary of checks performed”.
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 25

The step under review	The Law on Information Security is adopted by the Parliament in full alignment with the NIS2 directive
Baseline	Law on Information Security not aligned with NIS2
Deadline of the step	December 2025
Actual results	The Law on Information Security was adopted by the National Assembly of the Republic of Serbia on 22 October 2025 and entered into force on 31 October 2025. The adopted law establishes a comprehensive framework for strengthening cyber resilience, aligned with the requirements of the NIS2 Directive, including the classification of operators of ICT systems of special importance into essential (priority) ICT systems and important ICT systems, enhanced obligations for these entities, improved incident reporting mechanisms, risk management measures, as well as provisions on supervision and enforcement, together with the strengthening of institutional roles and responsibilities and the establishment of the Office for Information Security. The Law also strengthens the role of the National CERT in incident response and risk management, establishes the Office for Information Security to play a central role in supervision, coordination and response from 2027 and addresses previously identified gaps in the national cyber security framework, including improving existing ICT protection mechanisms and laying the legal basis for new initiatives such as ICT product, process and service certification. The drafting process of the Law on Information Security included two public consultations conducted in line with national procedures. The first public consultation was held between July and August 2023 and included the publication of the draft law on the website of the Ministry of Information and Telecommunications and on the e-Consultations Portal, as well as public round

	tables with the participation of representatives of public authorities, the private sector, academia, civil society organisations and other interested stakeholders. A second public consultation was conducted in July 2024, including an online public round table. Comments and suggestions received during both public consultations were analysed and those contributing to the alignment with the EU acquis, the improvement of the legislative and institutional framework and the practical implementation of the law were taken into account and incorporated into the final text of the Law. With regard to obtaining the opinion of the European Commission, the Ministry of Information and Telecommunications submitted the draft Law on Information Security in November 2024, together with a detailed table of concordance, for assessment of its alignment with the NIS2 Directive. Following the preliminary comments received in December 2024, the Ministry submitted a revised and aligned draft of the law, together with an updated table of concordance. Based on the submitted version, the European Commission provided its opinion and additional comments in August 2025. Most of these comments and recommendations were incorporated into the final text of the Law adopted by the National Assembly which is in our view substantially fully aligned with NIS2 Directive. The adopted Law on Information Security, together with the updated table of concordance, was subsequently re-submitted to the European Commission for the purpose of obtaining a final assessment of compliance with the NIS2 Directive. The formal assessment by the European Commission is still pending. The adoption of the Law represents a significant milestone in aligning the national cyber security framework with the European Union acquis and establishes the legal basis for the effective implementation and supervision of cyber security measures in relevant sectors.
Evidence provided	- Official publication of the Law on Information Security in the Official Gazette of the Republic of Serbia, available at the following link: https://pravno-informacioni-sistem.rs/slglrsViewPdf/ac82eb18-d107-48bb-8e77-47525a36a48b?fromLink=true. The Law is published on page 17 of the Official Gazette (in Serbian). - The English version of the Law on Information Security
Checks performed in the verification of the step and related findings	For each payment step assessed as fully achieved, the National Coordinator Technical Secretariat applied a dedicated verification approach, informed by the meetings held during the reporting period. This approach enabled a targeted review of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”. In relation to this payment step, the Ministry of European Integration provided its opinion on the relevant legislation in the framework of the regular regulatory procedure. Consultations with the European Commission on the alignment of the Law on Information Security with the NIS2 Directive were concluded in

	February 2025. Verification of the fulfilment of this payment step was carried out by confirming the official adoption and publication of the Law on Information Security in the Official Gazette of the Republic of Serbia. Progress was subsequently reviewed through structured exchanges with civil society representatives at the meeting held with the National Convention on the European Union. Written comments received on 15 December welcomed the alignment of the Law on Information Security with the NIS2 Directive. In addition, as part of the NC TS desk-based verification, it was confirmed that all documents required for the verification of this payment step had been submitted by the competent institution and were consistent with the sources of verification defined in Annex 1 of the Reform Agenda.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

Fiche No. 26

The step under review	List of entities in scope of the national law corresponding to the NIS2 Directive is finalized and Frameworks introduced by NIS2 alignment (CVD framework, crisis management framework), are in place and in use
Baseline	List of entities in scope of the national law corresponding to the NIS2 Directive is NOT prepared and Frameworks NOT introduced by NIS2 alignment (CVD framework, crisis management)
Deadline of the step	December 2025
Actual results	Work on the preparation and finalization of the regulations required under the NIS2 Directive has been actively progressing. The Ministry of Information and Telecommunications has drafted the regulation establishing the criteria for identifying operators of ICT systems of particular importance. In line with the provisions of the Information Security Law, the Ministry requested all relevant line ministries to provide sector-specific criteria for identifying such operators, whose disruption could have significant consequences for citizens, the economy, and the functioning of society. After receiving and processing the

	submitted proposals, the Ministry is analysing, harmonising, and systematising them to prepare the final version of the draft regulation, which will then be submitted to the Government of the Republic of Serbia for consideration and adoption. At the same time, the Ministry has been developing the regulation on Coordinated Vulnerability Disclosure (CVD). This regulation defines the mechanisms and responsibilities of stakeholders in reporting, reviewing, and remediating vulnerabilities in ICT systems, as well as the rules for communication between competent authorities, ICT operators, and security researchers. The regulation aims to establish a unified and predictable framework that ensures timely identification and remediation of vulnerabilities, reduces the risk of misuse, and contributes to strengthening the overall level of cybersecurity in the Republic of Serbia. These preparatory and coordination activities provide the necessary foundation for the formal adoption and operational implementation of both regulations. While the December 2025 milestone for completion has passed, the step is advancing and expected to be finalized shortly, demonstrating that the process is under control and progressing toward its objectives.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	The progress of the step was reviewed in terms of the preparatory and drafting activities carried out. Activities are advancing in an organised and coordinated manner, with active engagement of relevant stakeholders and internal alignment. The National Coordinator Technical Secretariat continues to follow the implementation of this step in line with its respective implementation stage. The NC TS regularly monitors progress and requests updates from the institutions responsible for implementation. The progress of these steps is discussed in the meetings described in the section “Summary of checks performed”.
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 27

The step under review	The Law on Artificial Intelligence is adopted, based on a high-risk approach, and with the necessary enforcement structures in place
Baseline	AI regulation is not adopted
Deadline of the step	December 2025
Actual results	Preparations are currently underway for the establishment of a new Working Group responsible for drafting the Law on Artificial Intelligence. Following the change in the Government of the Republic of Serbia, the mandate of the previous Working Group has concluded, and a new body will be constituted in the coming period. Once established, the new Working Group will resume all activities related to the development of the AI legislative framework and continue the preparation of the Law on Artificial Intelligence. In light of these institutional changes, an extension of the deadline for drafting and adopting the law will be required.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	N/A
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 28

The step under review	The Office for Information Security [within the Office for IT and e-Government] is operational [sufficiently staffed with at least 20 employees, equipped with supervisory powers, performing supervisory checks]
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Baseline	Office for Cybersecurity not operational and with not supervisory powers
Deadline of the step	December 2025
Actual results	The legal prerequisite for the fulfilment of the step was the adoption of the new Law on Information Security (passed on October 23, 2025, published in the “Official Gazette” No. 91/2025-17, hereinafter: Law), which prescribes the establishment of the Office for Information Security by January 1, 2027, as well as a new organisational unit within the Office for Information Technologies and eGovernment to perform the responsibilities of the Office for Information Security (except for the responsibilities of the National CERT), until January 1, 2027. A new Rulebook on Internal Organization and Systematization of Work Positions in the Office for Information Technologies and eGovernment, No. 004816852 2025 10258 005 003 113 012, establishing a new organizational unit - Department of Information Security, was approved by the Government’s Conclusion 05 No.: 110-13984/2025 on December 18, 2025, enabling the transfer of employees and the start of the hiring procedure. By the end of December 2025, the Department of Information Security within the Office for Information Technologies and eGovernment ensured the staff necessary to perform the responsibilities prescribed by the Law.
Evidence provided	- The report of the Office for IT and eGovernment - The Rulebook on Internal Organization and Systematization of Work Positions in the Office for Information Technologies and eGovernment No. 004816852 2025 10258 005 003 113 012 and the Government Conclusion 05 No.: 110-13984/2025 of 18 December 2025 giving consent to the Rulebook - the original document and its machine translation - Employment contracts - scan of the original documents and their translation (personal data concealed) - Employment contracts provided as evidence comprise 8 rulings assigning employees to the work positions in a new organizational unit - Department of Information Security, and 12 contracts concluded allowing the Office for Information Technologies and eGovernment to conduct the formal hiring procedure for permanent employment and will be extended for the period necessary for its completion. - Clarification by Office for IT and eGovernment
Checks performed in the verification of the step and related findings	For each payment step assessed as fully achieved, the National Coordinator Technical Secretariat applied a dedicated verification approach, informed by the meetings held during the reporting period. This approach enabled a targeted review of implementation progress, supported a consistent understanding of fulfilment requirements, and ensured verification of the completeness and coherence of the supporting evidence. The relevant meetings informing this assessment are described in the section “Summary of checks performed”.

	During the reporting period, representatives of the Office for IT and e-Government raised a question regarding the actions required for the full achievement of this payment step, in particular the types of employment contracts to be counted towards the minimum threshold of 20 employees. This issue was clarified by the European Commission, which confirmed that both permanent and temporary employment contracts may be taken into account for the purpose of fulfilment, provided that there is an intention for temporary contracts to be converted into permanent positions. The NC TS conducted a desk-based review of the documentation package submitted by the Office for IT and e-Government in order to assess the completeness of the evidence provided. This review included an examination of the employment contracts, confirming that the Department of Information Security within the Office for IT and e-Government is sufficiently staffed to perform the prescribed responsibilities associated with this payment step.
Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

Fiche No. 29

The step under review	a. Relevant legislation to address ODIHR and Council of Europe key recommendations, revised and adopted b. Improved capacities of Republic Electoral Commission and granting it its own secretariat.
Baseline	ODIHR February 2024 Report recommending to address recommendations pertaining to amending election legislation and capacities of Republic Electoral Commission
Deadline of the step	December 2025

Actual results	1. Revise and adopt relevant legislation to address ODIHR and Council of Europe key recommendations At the beginning of its work, the Working Group set as its priority the adoption of the Law on the Unified Voter Register; therefore, other laws addressed in ODIHR recommendations are still in the procedure. 2. Improve capacities of Republic Electoral Commission and grant it its own secretariat Article 8, paragraph 1 of the Rules of Procedure of the Republic Electoral Commission (Official Gazette of the RS, No. 19/22) lays down that the National Assembly Service shall ensure and provide the necessary professional, administrative and technical assistance in carrying out the tasks within the REC's and its Working Groups' purview, in compliance with the law and the National Assembly's Decision on organisation and operation of the Service. The Rulebook on Internal Organisation and Job Classification (Systematisation) in the National Assembly Service of 20 December 2024 lays down the establishment of the REC Support Sector within the NARS Service. The job classification comprises a total of 21 job positions with 39 employees.
Evidence provided	Further information on achieving this implementation stage: - http://www.parlament.gov.rs/national-assembly/organisation-and-support-service.508.html
Checks performed in the verification of the step and related findings	N/A
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 30

The step under review	The legislation foreseen following the adoption of action plans on gender-based violence, de-institutionalisation and national minorities is prepared and adopted (following transparent and inclusive consultations in Serbia
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	and with the Commission, and in line with the EU acquis and European and UN standards)
Baseline	Existing legal framework related to those areas need to be aligned with EU acquis and EU and UN standards
Deadline of the step	December 2025
Actual results	Criminal Procedure Code By the Decision of the Minister of Justice No. 119-01-126/2021-05 of 12 May 2021, the Working Group for the Analysis of Criminal Procedure was established in order to identify and eliminate its weaknesses and shortcomings and to prepare a draft Law on Amendments and Supplements to the Criminal Procedure Code based on the results of the analysis. The draft Law on Amendments and Supplements to the Criminal Procedure Code was sent to the European Commission for an expert opinion on 26 August 2024, together with the accompanying Table of Concordance with relevant EU regulations. A public debate was held from 1 October to 1 November 2024. The expert opinion of the European Commission on the text of the Law on Amendments and Supplements to the Criminal Procedure Code was submitted to the Ministry of Justice in mid-November 2024. Given the great public interest in the Law on Amendments and Supplements to the Criminal Procedure Code, another round of public debate was held from September 10 to October 1, 2025. The translated draft Law on Amendments and Supplements to the Criminal Procedure Code together with the Tables of Concordance was sent to the European Commission on 15 October 2025. The adoption of the Law on Amendments and Supplements to the Criminal Procedure Code is expected in the first quarter of 2026. Criminal Code By the Decision of the Minister of Justice No. 119-01-125/2021-05 of 12 May 2021, the Working Group for the Analysis of the Effectiveness of the Criminal Justice System was established, based on completed cases, with the aim of identifying and eliminating its weaknesses and shortcomings and to prepare a draft Law on Amendments and Supplements to the Criminal Code based on the results of the analysis. The Working Group meets regularly. The draft Law on Amendments and Supplements to the Criminal Code was submitted to the European Commission for expert opinion on 26 August 2024, together with the accompanying table of compliance with relevant EU legislation. A public debate was held from 1 October to 1 November 2024. The expert opinion of the European Commission on the text of the Law on Amendments and Supplements to the Criminal Code was submitted to the Ministry of Justice in mid-November 2024. Afterwards Draft text was consolidated with the submitted comments from the European Commission as well as the comments from the public debate that Ministry of Justice received. Given the great public interest in the Law on Amendments and Supplements to

	the Criminal Code, another round of public debate was held from September 10 to October 1, 2025. The translated draft Law on Amendments and Supplements to the Criminal Code together with the Tables of Concordance was sent to the European Commission on 15 October 2025. The adoption of the Law on Amendments and Supplements to the Criminal Code is expected in the first quarter of 2026. Law on Prevention of Domestic Violence The Working group for drafting the text of the Law on Prevention of Domestic Violence was established by the Decision of the Minister of Justice No 011-00-108/2025-05 from 30 July 2025. The translated Draft of the Law on Prevention of Domestic Violence together with the Tables of Concordance was sent to the European Commission on 10th November 2025. Public debate on the Draft of the Law on Prevention of Domestic Violence was held from November 12 to December 2, 2025. The translated report of Public debate was sent to the European Commission on 18th December 2025. The adoption of the Law on Prevention of Domestic Violence is expected in the first quarter of 2026. Law on Juvenile Criminal Offenders and Criminal Protection of Juveniles The Working group for drafting the text of the Law on Juvenile Criminal Offenders and Criminal Protection of Juveniles was established by the Decision of the Minister of Justice No. 011-00-81/2024-05 of 27 June 2025. First meeting of the Working group was organized on the 3 July 2025. Public debate on the Draft of the Law on Juvenile Criminal Offenders and Criminal Protection of Juveniles was held from September 10 to October 1, 2025. The translated Draft of the Law on Juvenile Criminal Offenders and Criminal Protection of Juveniles together with the Tables of Concordance was sent to the European Commission on 15 October 2025. The adoption of the law is expected in the first quarter of 2026. Family Law The Ministry of Family Welfare and Demography initiated the set up the Working Group mandated to prepare Draft Amendments of the Family Law in December 2025. The adoption of the Law on Amendments of Family Law is rescheduled for 2026.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	N/A

Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 31

The step under review	Full implementation of media legislation is ensured, [December 2025] in particular: All external complaints received by REM in 2025 are decided upon and published, including explanations on REM reasoning. Public co-funding of media content complies with Article 24 of the Law on public information and media.
Baseline	According to the Law on Public Information and media open calls for proposals for co-financing projects for producing for media content of public interest are launched and procedures are ongoing
Deadline of the step	December 2025
Actual results	MIT According to Article 16, paragraph 1, item 4 of the Law on Public Information and Media (“Official Gazette of the Republic of Serbia”, No. 92/23 and 51/25), the Republic of Serbia shall achieve public interest in the field of public information by co-financing projects in the field of public information. In accordance with Art.18 the Republic of Serbia, the Autonomous Province or the local self-government unit shall provide from their budgets part of the funding for the achievement of public interest in the field of public information and shall allocate such funding on the basis of public competitions and allowances, pursuant to the regulations governing the granting of state aid and competition protection, without discrimination. Projects are mainly financed through open calls for projects announced to provide financial support for the production of media content that contributes to the achievement of the public interest in the field of public information, defined in Article 15 of the Law on Public Information and Media.

Additionally, with a view to aggregating all relevant information and improving the transparency of co-financing of projects in the field of public information conduct, the procedure of co-financing of the projects procedure is implemented through an online platform - the Unified Information System for the Implementation and Monitoring of Co-financing of Projects in the Field of Public Information (JIS) and all data, except personal data, are public, and the entire process is transparent.

Article 24, paragraph 1 of the Law stipulates that the project shall be assessed, among other things, according to the extent to which the media outlet through which the project will be implemented adheres to professional and ethical standards.

The aforementioned measure shall be proven by obtaining data from the competent bodies that in the year preceding the open call no measure was issued by the regulatory authority in the case of electronic media, or no act was issued by the self-regulatory authority of the Press Council – for print and online media, which determined that the specific media outlet violated legal provisions, i.e. standards of professional ethics.

Also, Article 32, paragraph 1, item 4 of the Law stipulates that, among other things, the persons obliged to enter data and documents and the users of the Unified Information System are representatives of state authorities, the Regulatory Authority for Electronic Media and the Press Council who impose measures on media outlets for violations of regulations and professional and ethical standards.

In addition, Article 33, paragraph 1, item 2) of the Law stipulates that the Unified Information System also contains data on measures imposed by state authorities, the Regulatory Authority for Electronic Media and the Press Council for violations of regulations and professional and ethical standards.

Based on Article 17 of the Rulebook on Co-financing of Projects for the Realization of Public Interest in the Field of Public Information (“Official Gazette of the Republic of Serbia”, No. 6/24, 106/24 and 98/25), one of the criteria for evaluating projects submitted to the open call for projects is whether the media outlet through which the project will be implemented has been subject to measures imposed by state authorities, the Regulatory Authority for Electronic Media or the Press Council during the previous calendar year for violating professional and ethical standards.

According to the scoring list for evaluating media content production projects, the members of the Commission had the opportunity to rate the media outlet that applied for the open call based on the measures imposed by the Press Council with the following points for measure 7. Measure in which the media outlet through which the project will be implemented adheres to professional and ethical standards:

- 0 - the imposed measure was not published;
- 5 - multiple measures were imposed and published;
- 10 - the imposed measure was published and not repeated;
- 15 - no measure was imposed.

	REM According to the European Commission's clarification, REM has not fulfilled the step on the transparency of its work, due to objective legal and institutional constraints. All complaints and decisions adopted by the REM Council in 2023 and 2024 have been published on REM's official website. Furthermore, all complaints submitted after the expiration of the mandate of the previous Council, together with reports and analyses prepared by REM's professional departments - intended for consideration by the newly appointed Council - covering November and December 2024 and the year 2025, have also been published. However, formal decisions on external complaints submitted in late 2024 and throughout 2025 have not yet been adopted, as the REM Council - the only body authorised under the Law on Electronic Media to consider and adopt such decisions - has not yet been appointed.
Evidence provided	- Report of the Ministry of Information and Telecommunications The relevant publicly available documentation is available at the following links: - Complaints and decisions from 2023: https://www.rem.rs/sr/izvestaji-i-analize/izvestaji-i-analize-o-nadzoru-pruzalaca-medijskih-usluga/izbori/izbori-2023/prijave-izbori-2023 - Complaints and decisions from 2024: https://www.rem.rs/sr/izvestaji-i-analize/izvestaji-i-analize-o-nadzoru-pruzalaca-medijskih-usluga/izbori/izbori-2024/prijave-izbori-2024 - Complaints and reports (analyses) from November - December 2024 and 2025: https://www.rem.rs/sr/prijave/odluke-po-prijavama - English translation of analyses for 2025: https://rem.rs/en/complaints/decisions-on-complaints
Checks performed in the verification of the step and related findings	According to the Law on Public Information and Media, a Unified Information System (JIS) has been established for the implementation and monitoring of co-financing of projects in the field of public information, whereas the source of verification is the website of the Unified Information System (jis@mit.gov.rs) From the archive of decisions and complaints (link https://savetzastampu.rs/zalbe/?zalbe_page=1) of the Press Council for media that violated the code in the last twelve months of 2025, it was established that measures were issued against some of the media outlets that participated at the open calls for projects in the field of public information. The professional departments of REM carried out checks for the purpose of verifying this step and published the relevant complaints, reports and available decisions in accordance with their statutory competences. The National Coordinator Technical Secretariat continues to follow the implementation of this step in line with its respective implementation stage. The NC TS regularly monitors progress and requests updates from the institutions

	responsible for implementation. The progress of these steps is discussed in the meetings described in the section “Summary of checks performed”.
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 32

The step under review	Adoption of operational plan on financial investigations
Baseline	Currently there is no any strategic framework covering the financial investigations in Serbia
Deadline of the step	December 2025
Actual results	The revised Action Plan for Chapter 23: "Judiciary and Fundamental Rights" and the revised Action Plan for Chapter 24: "Justice, Freedom, and Security," in the subchapters related to the fight against corruption and organized crime, envisage the development and adoption of a strategic framework in the field of combating financial crime. Moreover, the Reform Agenda of the Republic of Serbia, through the European Union Growth Plan for the Western Balkans, includes the adoption of an Operational Plan for Financial Investigations as one of the measures in the fight against organized crime. Pursuant to the abovementioned, the Ministry of Justice, on May 13, 2025, established the Working Group for drafting the Operational Plan for Financial Investigations. The Working Group consists of relevant stakeholders (representatives of the Ministry of Interior, Supreme Public Prosecutor's Office, Public Prosecutor's Office for Organized Crime, representatives of the Ministry of Finance, National Bank, Agency for Prevention of Corruption, Republic Directorate for Property of the Republic of Serbia, Serbian Business Registers Agency, Republic Geodetic Authority). The inaugural meeting of the Working Group was organized on May 26, 2025. The second meeting of the Working Group for drafting the Operational Plan for Financial Investigations was held in the form of a three-day retreat in Sokobanja, in the period of June 9-11, 2025. Public debate on the Draft text of the Operational Plan for Financial Investigations was held from October 22 to November 10, 2025.

	The translated Draft text of the Operational Plan for Financial Investigations was sent to the EC on 25 November. The adoption of the Operational Plan for Financial Investigations is expected in the first quarter of 2026.
Evidence provided	- The Ministry of Justice made a public call for the drafting of the Operational Plan for Financial Investigations https://ekonsultacije.gov.rs/topicOfDiscussionPage/520/3
Checks performed in the verification of the step and related findings	N/A
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 33

The step under review	All vacant positions for prosecutors and judges in anti-corruption departments and in special prosecutor's office for organised crime, and special department of the higher court and of the appellate court in Belgrade for organised crime are filled in accordance with the Annual Schedule of Judges (adopted by the HJC) and the Decision of the High Prosecution Council on the number of public prosecutors and trained.
Baseline	No. of employees in special departments for Suppression of Corruption within the High Prosecution Offices Beograd – 9, Novi Sad – 12, Niš – 9, Kraljevo – 6. No of employees in special departments for Suppression of Corruption in the High Courts

	Beograd – 4, Novi Sad – 6, Niš – 5, Kraljevo – 6. Prosecutors Office for Organised Crime has 22 public prosecutors. Special Department of the Appellate Court in Belgrade has 11 judges
Deadline of the step	December 2025
Actual results	High Judicial Council On several occasions, we have pointed out that the annual schedule of the court activities is not adopted by the High Judicial Council. Pursuant to Article 35 of the Law on the Organization of Courts (“Official Gazette of the Republic of Serbia”, No. 10/23), the annual schedule of work activities shall be adopted by the president of the court. Article 36 prescribes the procedure for adopting the annual schedule of activities. The president of the court determines the schedule of court activities in writing for the following year after obtaining the opinion of the judges and announces it at a session of all judges by 1 November of the current year. A judge can file an objection to the annual schedule of activities and changes to the annual schedule to the High Judicial Council, within three days from the day the schedule of activities or amendments are presented at the session of all judges or from the day the judge becomes acquainted with the annual schedule of activities, if the judge, for justified reasons, did not attend the session of all judges. Article 53 prescribes the rights and obligations of court president. The court president shall organise the work of the court, represents the court, manages court administration, ensure the implementation of the Court Rules of Procedure, and shall be responsible for the proper and timely operation of the court. The court president is required to ensure legality, order and accuracy in the court, order removal of irregularities and prevent excessive delays in work, designate ex officio lawyers, ensure the safeguarding of the independence of judges and the reputation of the court, and perform other tasks set forth by law and the Court Rules of Procedure. Taking into account the above legal provisions, it is a fact that the president of the court, through the annual schedule of work, assigns judges to court divisions, including, among others, the Organized Crime Division and the Anti-Corruption Division in courts where such divisions exist, while ensuring the proper and timely functioning of the court. We specifically point out that courts publish their annual schedules of activities on their official websites. The annual schedule of work lists the names of judges assigned to the Organized Crime Division and the Anti-Corruption Division. No. of judges in special departments for Suppression of Corruption in the High Courts

	• Beograd – 5, • Novi Sad – 7, • Niš – 8, • Kraljevo – 5, • Special Department of the Appellate Court in Belgrade has 11 judges. High Prosecutorial Council The Public Prosecutor's Office for Organized Crime has 25 public prosecutor positions. As of the end of 2025, the public prosecutor's function in the Public Prosecutor's Office for Organized Crime is performed by 9 elected and 10 seconded public prosecutors, a total of 19. Total number of employees in special departments for Suppression of Corruption within the High Prosecution Offices is 55. Beograd – 20 Novi Sad – 13, Niš – 10, Kraljevo – 12. Filling of vacant positions of anti-corruption departments in the Higher Public Prosecutors Offices of Belgrade, Novi Sad, Niš, and Kraljevo is not within the competencies of the High Prosecutorial Council as the number of public prosecutors, as well as the filling of vacant public prosecutor positions in these departments are determined by the internal yearly work plan of each Public Prosecutors Office in question.
Evidence provided	N/A
Checks performed in the verification of the step and related findings	N/A
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

Fiche No. 34

The step under review	Number of elected judges and number of public prosecutors increased by 10%
Baseline	2 718 judges employed 689 public prosecutors perform their duties
Deadline of the step	December 2025
Actual results	High Judicial Council In the period from October 2024 to 31 December 2025, a total of 153 judges were elected for the first time. Out of the 153 judges elected for the first time, three (3) judges did not assume judicial office. The reason is that the Constitutional Court has not yet decided on the appeals lodged against the decisions on their election. High Prosecutorial Council As of the end of 2025 there are 899 public prosecutor and 90 chief public prosecutor positions, including the Supreme Public Prosecutor, in the public prosecution systematization of the Republic of Serbia. Currently there are 698 public prosecutors and 64 chief public prosecutors (including the Supreme Public Prosecutor) performing their function. During 2025, 59 public prosecutors who were elected during 2024 took office, which number is included in the previously stated 698 public prosecutors who perform the function. During 2025, 51 public prosecutors were elected, of which none had taken office by the time of the report submission due to the appeal procedure before the Constitutional Court that had not yet been completed. In 2025, only one Chief Public Prosecutor took office, and he is included in the number of 64 Chief Public Prosecutors who hold office. During 2025, public calls for 20 Chief Public Prosecutors and 88 Public Prosecutors were annulled and the procedures for these positions must be repeated. Since its establishment, the Council has announced a total of 16 public competitions for the election of chief public prosecutors and public prosecutors. Of that number, 8 public competitions were announced chief public prosecutors and 8 for public prosecutors. Out of these, 6 are still ongoing, 4 for public prosecutors and 2 for chief public prosecutors. In addition to this, the Council has completed 2 public competitions for the election of chief public prosecutors and 4 public competitions for the election of public prosecutors that were announced by the previous State Prosecutorial Council.

Evidence provided	HJC - All decisions are published on the website of the High Judicial Council www.vss.sud.rs and in the "Official Gazette of the Republic of Serbia" and thus available to the public. HPC - Link to the 7th Session of the Council - Link to the list of public competitions for public prosecutors and chief public prosecutors in 2025
Checks performed in the verification of the step and related findings	N/A
Compliance with general principles and DNSH principle	N/A
Double funding	N/A
Clear conclusion on the achievement of the step	Not achieved

PROSPECTS OF ACHIEVING THE STEPS REQUIRED FOR THE NEXT RELEASE OF FUNDS

1. The Law on Land Consolidation is adopted

The Working Group for the preparation of the Draft Law on Land Consolidation was established on 25 July 2025. The first meeting of the Working Group was held on 19 September 2025. Work on the preparation of the Draft Law is ongoing. The MAFWM will make every effort to meet the deadlines set out in the Reform Agenda.

2. TSO to participate in Regional Coordination Centres and fulfil conditions to join EU balancing platforms

Based on current progress, the completed sub-steps provide a solid legal and institutional foundation. The ongoing activities, particularly formal agreements and technical preparation

for EU platform integration, are on track. With no major obstacles observed and given the proactive engagement of EMS with European platforms, the planned deadline for June 2026 are likely to be met, though some risk remains from external regulatory developments (e.g., CBAM implementation).

3. Adoption of the legal and institutional framework for designating renewable acceleration areas and permit granting procedures in line with the Directive (EU) 2023/2413.

Based on current progress, the step is advancing according to schedule, with legislative analysis and drafting well underway, and the establishment of renewable acceleration areas expected to be achieved within the planned timeframe.

4. Digital Corners (adult digital skills training centre) are established and operative in 50+ municipalities

Based on the progress recorded to date, the achievement of the step is considered feasible, subject to the timely completion of the next implementation phases.

A comprehensive study and implementation plan for the establishment of Digital Corners is planned to be developed by April 2026. The study will define the operational model, implementation timeline and coordination mechanisms with local self-governments.

Following the adoption of the implementation framework and based on the findings of the study, the establishment and operationalisation of Digital Corners is planned to be rolled out progressively across municipalities. While full coverage of 50 municipalities is planned by June 2026, efforts will be made to initiate the establishment process as early as possible in order to align implementation with the milestone timeline.

5. Alignment is achieved with Regulation (EU) 2020/1056 on electronic freight transport information (eFTI)

The PLAC IV Project consultant submitted a Draft Law on Amendments to the Law on Road Transport Contracts. Following this, a meeting of the Working Group was held. Taking into account the scope and number of necessary amendments to the existing law, the Working Group decided to propose to the Minister of Construction, Transport and Infrastructure that the current Working Group be dissolved and that two new Working Groups be established to prepare the new Law on Road Transport Contracts and the Law on Passenger Rights and Passenger Transport Contracts.

Both Working Groups were subsequently established and their first meetings were held. During these meetings, the discussion continued on the text prepared by the PLAC IV Project consultant, which served as the initial working document for further legislative drafting.

6. At least 80% of children aged 3 to 5,5 years enrolled in pre-primary education

The prospect of achievement of the step is not probable by June 2026, we expect the grace period to be triggered.

7. At least 38% of children aged 6 months to 3 years participate in pre-school education

This target will probably be achieved.

8. Transition rates from elementary to secondary education increased to 99% and completion rates of secondary students increased to 93%, as projected considering an ambitious yet realistic increase rate. Specific targets for women and students with disabilities [students with individual education plans]

The prospect of achievement of this step is dependable on certain number of still unverifiable parameters.

9. Both Actions plans continuously implemented, leading to (i) increased number of investigations, indictments and final convictions in organised crime cases (track record), (ii) Increased number of investigations, indictments and final convictions for trafficking of weapons (track record), (iii) Increased number and value of seized and confiscated assets in serious and organised crime cases, (iv) Increased number of tracing of firearms and investigations on origin of seized weapons (track record), (v) Increased number of victims of THB granted especially vulnerable witness status in line with the Code of Criminal Procedure

This activity will be effectively monitored on an ongoing basis following the adoption of the documents mentioned above, beginning in June 2026. We are pleased to confirm that the Program and AP for SALW have successfully been adopted.

10. The track record of effective and efficient investigations, prosecutions, final judgements, seizure, and final confiscations in corruption, including high-level corruption cases is improved

Data are being collected continuously.