



# SECURITIZING CORRUPTION: RESPONDING TO FOREIGN CORRUPT INFLUENCES IN BOSNIA AND HERZEGOVINA

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By Nedim Hogić, PhD

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*Securitizing Corruption: Responding to Foreign Corrupt Influences in Bosnia and Herzegovina*

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# CONTENTS

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EXECUTIVE SUMMARY .....	1
PROBLEM HISTORY .....	2
RESEARCH QUESTION .....	4
NEW FINDINGS .....	5
1. Outdated Approach to National Security .....	5
2. Criminal Law and the Work of Judiciary Against Corruption .....	5
3. Business and Tax Law .....	6
4. Party Funding and Campaign Finance .....	6
5. Foreign Investment .....	7
6. Political Background of Foreign Influence .....	8
POLICY RECOMMENDATIONS .....	9
LIST OF REFERENCES .....	11

# EXECUTIVE SUMMARY

Bosnia and Herzegovina (BiH) has an outdated and inadequate system for combatting and preventing transnational corruption, kleptocracy, and foreign influences. There are two main reasons underlying this assessment. First, is the gradual evolution of external corrupt threats. Second, and most important, is the continual negotiation of the country's status and political orientation amongst its ethnonational elites. These negotiations ultimately slow government decision-making processes and make Bosnian political leaders more vulnerable to external influence. Further, BiH failed to take advantage of relatively favorable conditions that existed earlier in the 21st century to effectively counter systemic corruption and has thus been subsequently exposed to significant foreign threats.

This paper advocates that BiH should make changes in several key strategic areas that are of particular

importance to combatting external threats. Based on a literature review exploring the responses to contemporary corrupt threats, and supported by interviews with leading domestic experts from relevant areas, this paper calls for specific changes to existing government practices and regulations regarding national security, party and campaign financing, foreign investment screening, business and tax law, and structural political stability. This paper offers a structured set of recommendations assigned to specific institutional actors, both domestic and international, that seek to address the growing challenge of foreign influence by countering the weaponization of corruption and kleptocracy. Should the new government be in position to maintain its majority, an adequate window of opportunity for these reforms may exist in 2023 and 2024.



# PROBLEM HISTORY

The popularity, spread, and diversity of policy measures against corruption has significantly expanded since the 1990s, a decade in which anti-corruption became one of the most important policy topics in the world. The conviction that corruption was detrimental to economic development, rule of law, and democracy drove the global spread of anti-corruption policy measures. Another important factor was the belief that the gradual spread of a liberal economic order should lead to an even playing field for multinational companies and multinational investors as the most important facilitators of the rise of global capitalism. International legal conventions that aimed to combat corruption, such as the Convention Against Bribery of Foreign Officials or the United Nations Convention Against Corruption, were translated to domestic legislative commitments. Despite significant policy failures and misconceptions regarding how anti-corruption policies are supposed to be implemented, international conventions created a global anti-corruption norm.

While the spread of this global anti-corruption effort did not bypass BiH, it made less of a difference than expected. Four main factors make the country a fertile ground for corruption: (1) the presence of organized crime groups with strong connections to the political elite, (2) a massive influx of foreign aid, (3) a political and electoral system that favors influence trading and clientelism, and (4) a perpetual nonviolent conflict between the leading political actors.<sup>1</sup> While the second and third have persisted as corruption threats in BiH, foreign aid has receded significantly, insofar that it does not represent a significant source of funding for BiH. However, rather than making matters easier, the vacuum left behind from lack of foreign aid has been replaced by foreign influence.

Foreign actors seek to capture BiH to serve their kleptocratic interests, which brings no beneficial elements whatsoever.

The political structure of the country and its unresolved statehood have made the quest for external influence a legitimizing factor. The Dayton Peace Accords (DPA) that ended the war codified the country's political structure and included a key provision stating that the Office of the High Representative and the Peace Implementation Council will oversee the implementation of the DPA's civilian aspects. The external governance component of BiH's politics has led to domestic competition over influence within these two institutions.<sup>2</sup> Additionally, the absence of a firm Euro-Atlantic footing reinforces the seeking of foreign influence, making the country a geopolitically contested area. Pursuit of investments in the energy sector by Chinese and Russian investors was, and continues to be, fraught with legal problems and credibility issues. On the other hand, European Union (EU) development policies, such as the European Green Deal, demonstrate the EU's ignorance of the political situation in BiH. The level of foreign investment that followed European integration reforms did not occur at a scale comparable to that which occurred in the countries of the 2004 enlargement. And yet, unlike the countries that joined the EU in 2004, BiH and the remaining Western Balkan countries have fulfilled many of the EU's open market accession demands. While this made BiH a more attractive trade partner, it also limited opportunities for domestic producers and investments.

Following the 2014 liberalization of EU job access policies that simplified the procedures and the time needed to get a work permit, job seekers from the region and BiH in particular, rushed to leave the country. While

1 Roberto Belloni & Francesco Strazzari, *Corruption in post-conflict Bosnia-Herzegovina and Kosovo: a deal among friends*, *Third World Quarterly* 35.5 (2014): 855-871.; Nedim Hovic, *Electoral Rules and Corruption as Drivers of Political Fragmentation in Bosnia and Herzegovina*, in *Varieties of Political Clientelism: A Typology of Clientelist Exchanges in the Western Balkans and Beyond*, Institute for Sociological, Political and Juridical Research, Ss. Cyril and Methodius University in Skopje (2021), 157-178.

2 Philippe Leroux-Martin, *Diplomatic Counterinsurgency: Lessons from Bosnia and Herzegovina* (2014); Valery Perry, *Constitutional Reform in Bosnia and Herzegovina: Does the Road to Confederation go through the EU?*, *International Peacekeeping* 22.5 (2015): 490-510.; Solveig Richter, *Missing the muscles? Mediation by conditionality in Bosnia and Herzegovina*, *International Negotiation* 23.2 (2018): 258-277.

this made the flow of remittances steady, it prevented the building of a domestic constituency that would demand change from political and governmental actors. Facing many challenges, judicial institutions created to fight corruption received strong support and technical assistance, strengthening their capacity to respond to complex cases of criminal political corruption. Indeed, Bosnian courts prosecuted several high-level officials including prime ministers, heads of intelligence agencies, and former Presidency members.<sup>3</sup> However, as irreplaceable as they are in the anti-corruption toolbox, judicial measures have proven themselves inadequate to

prevent escalations of corrupt behavior from key political actors. After political elites disbanded the relatively robust system that monitored conflicts of interests between 2006 and 2013, corruption prevention efforts have been even less successful. The country's national anti-corruption agency is now toothless and effectively lacks the authority to investigate corrupt criminal acts. Rather, it serves only to streamline transparency practices and policy ideas. The diminishing prospect of European integration has failed to ignite the spark for externally driven reforms.



<sup>3</sup> The BiH Presidency is a three-member body which collectively serves as head of state and is comprised of three members: one Bosniak, one Croat, and one Serb.



# RESEARCH QUESTION

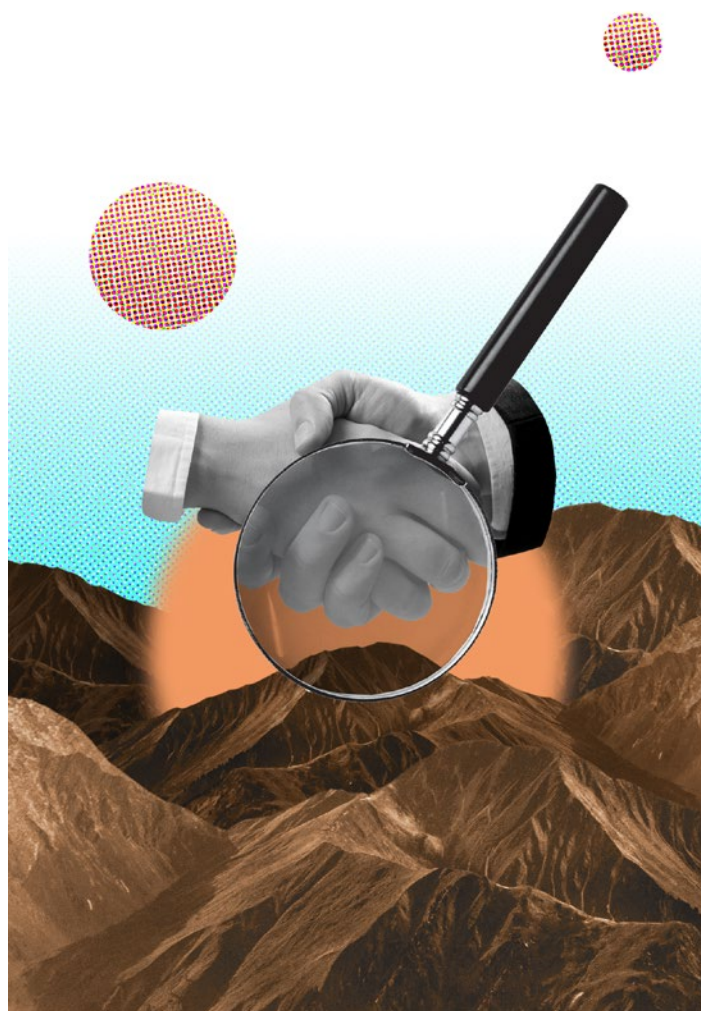
While many countries recognize corruption as a national security risk, few have regulated corruption in their national security documents. However, trends in the last few years testify to an increased interest in the topic, especially in the United States (US), where various administrations have recognized a need to treat transnational corruption as a national security matter.<sup>4</sup> Both the foreign policy and national security spaces have become important grounds for massive anti-corruption efforts that combat domestic and transnational corruption.

Driving this interest is the recognition that countries struggling with transnational corruption are vulnerable to outside influence from malign foreign actors. One such example of Western in this regard came in the aftermath of the Russian invasion of Ukraine, when the US Kleptocracy Task Force issued sanctions against some of the leading Russian oligarchs. These sanctions sought to pressure Moscow to cease its aggression, aiming to prevent weaponized corruption from impacting public policies and to address the behavior of politically exposed persons in the countries considered to be European allies of the US.

Certainly, BiH, like its regional peers, lacks the capacity to impact the behavior of foreign actors on a level comparable to that of Washington. However, changes are still needed in order to limit the weaponization of corruption. The interventions in question are needed as there is a documented history of external influence in BiH and the region.

As part of a series of papers produced by the Western Balkans Task Force on Threats to Democracy, this paper seeks to understand what can be done to prevent the weaponization of corruption for the promotion of malign foreign interests in BiH. I proceed to identify new findings and propose legislative and policy measures

in the key five areas: national security strategies, party funding, criminal legislation, business and tax law as well as the direct foreign investment framework. As anti-corruption reforms usually require opportune timing for action due to their potentially high political cost<sup>5</sup>, I argue that this window of opportunity presently exists and may continue in the years 2023 and 2024, as the broad coalition of diverse political forces allows a sweeping reform of many sectors with little effective opposition.



<sup>4</sup> Zelikow, P., Edelman, E., Harrison, K., & Gventer, C. W. (2020). The rise of strategic corruption. *Foreign Aff.*, 99, 107.

<sup>5</sup> See generally, *Seeing New Opportunities: How Global Actors Can Better Support Anticorruption Reformers*, Open Society Foundation (2020).

# NEW FINDINGS

## 1. Outdated Approach to National Security

To start, it is important to recognize that there is no singular strategic document - such as a national security strategy - that deals with the totality of security threats facing BiH. Instead, as is the case in select European countries, the security challenges facing the country are analyzed and addressed in a variety of documents. At the national level, the Security Policy of BiH merely governs the principle of security considerations without a reference to corruption. There are, however, three documents that deal with corruption specifically: two entity-level strategies for the fight against corruption and one national-level strategy.<sup>6</sup> These documents all fail to adequately recognize both the cross-border elements of the phenomenon as well as the strategic exploitation of corruption by malign foreign actors. It is important to update the documents by considering best practices from the national security documents of other countries and how they treat foreign malign influence. Germany is a useful example of a country whose national security is not regulated by a single document and where corruption and malign foreign influence are key issues. Berlin is working to incorporate corruption and foreign influence into a unified national strategy.<sup>7</sup> A new document in BiH should rely on the experience of the BiH Security and Intelligence Agency in the prevention of emerging threats from abroad. Further, it should also consider the comparative practices and input from the academic community and security-focused civil society organizations (CSOs).

## 2. Criminal Law and the Work of Judiciary Against Corruption

Evidence gathering is one of the key challenges facing any judicial based anti-corruption activity.<sup>8</sup> Prosecutors often encounter significant obstacles in identifying property acquired through illegal means and the individuals using that property. Further, the lack of capacity for financial investigations in prosecutorial offices in BiH is made worse by the fact that tax authorities do not fully leverage their own investigative authority.<sup>9</sup> Additionally, as prosecutors face obstructions in accessing the registries of property of the individuals under investigation, their ability to maintain the operational secrecy suffers.<sup>10</sup> A recent example from the "Sky ECC" case illustrates the limitations on judicial investigations.

Last year, a team of investigators obtained evidence against a group of drug lords following the decoding of the "SKY ECC" messaging application during a cooperative international investigation. However, the usage of this evidence in BiH has been problematic as the evidentiary standards for the admittance of documents collected without an explicit domestic court order may face legal challenges. The legal system does not recognize secret access to electronically encrypted communication. These two limitations make the legalization of such evidence problematic, potentially opening the door for future rejection of evidence that could be deemed illegal by domestic courts, consequentially constraining prosecutorial actions in cases of grand corruption and organized crime.<sup>11</sup>

<sup>6</sup> Sigurnosna politika Bosne i Hercegovine, (2006). [http://www.mod.gov.ba/slike2014/02.28.20\\_1\\_Sigurnosna%20politika%20BiH.pdf](http://www.mod.gov.ba/slike2014/02.28.20_1_Sigurnosna%20politika%20BiH.pdf), Anti-Corruption Strategy for 2015 - 2019 And The Action Plan for the Implementation of the Anti-Corruption Strategy for 2015 - 2019 <http://www.apik.ba/zakoni-i-drugi-akti/strategije/default.aspx?id=806&langTag=en-US>,

<sup>7</sup> Mickael Roumegoux Rouvelle and Christoph Kowalewski, Strategic Corruption Is a Security Threat <https://fourninesecurity.de/2022/11/30/strategic-corruption-is-a-security-threat>

<sup>8</sup> Sabine Gless, (2010). Truth or Due Process? The Use of Illegally Gathered Evidence in Criminal Trials-Germany. The Use of Illegally Gathered Evidence in Criminal Trials-Germany.

<sup>9</sup> Interview with a cantonal prosecutor, Feb 8, 2022.

<sup>10</sup> Procjena Toka Postupaka i Procesna Rada u Predmetima Visokog Nivoa Korupcije, Organizovanog i Privrednog Kriminala, USAID Justice Sector Against Corruption Project in BiH, p.18-19 <https://usaidjaca.ba/storage/publications/g1kqeGCsUN8MlyWwpkE8RLxKebFQKm98gHHhdtLi.pdf>

<sup>11</sup> Vanja Bajović (2022), Evidence from the EncroChat and SKY ECC encrypted phones. Crimen (Beograd), 13(2), 154-179.

### 3. Business and Tax Law

It is atypical to consider BiH as a tax haven since the basic precondition for operating as a tax haven – nontransparent beneficial ownership – does not exist. To the contrary, despite the absence of a unified corporate registry, the three registries that do exist are publicly accessible, free of charge. However, Republika Srpska's low corporate tax rate for foreign companies – one of the lowest in the region – drives the interest in tax evasion in BiH. This has encouraged foreign investors, often from Slovenia and aligned to its former right-wing government, to register shell companies.<sup>12</sup> It could be argued that this is a bigger problem for Slovenia than for BiH as it allows the citizens of Slovenia to avoid paying corporate tax. Yet, even the publicity of these schemes could encourage others to invest and could be used to place funds in real estate. There is no obligation for the automatic exchange of tax data between the Bosnian and Slovenian authorities. Only in cases where the law enforcement agencies from either of the countries suspect wrongdoing will a case be investigated, leaving maneuver space that can be exploited for money laundering.<sup>13</sup> Little oversight of gambling and real estate and lack of investigation of corruption in either of these industries open the door for money laundering opportunities in these two industries in particular. The gambling industry in BiH has been, especially in the Federation entity (FBiH), shielded from oversight of the tax and financial authorities.<sup>14</sup> A more robust analysis of the gambling industry, especially the opportunities for money laundering within it, would strengthen its integrity and possibly improve the security of the country. Similarly, the construction industry continues to be perceived as fertile ground for both domestic and foreign money laundering and is largely unregulated, often leading to increased real estate prices in Bosnian cities.

Additionally, BiH's uncoordinated approach to whistleblower protection has created a fragmented and uneven standard of protection. FBiH lacks whistleblower protection while only private and state employees are protected in the RS. Likewise, on the national level, there are protections for employees of BiH institutions.<sup>15</sup> Citizens outside of these protected industries have limited protection, largely depending on their access to quality legal representation and the likelihood that legal protection can be obtained under the Anti-Discrimination Law or labor regulations. Certainly, this is not sufficient, which is why more modern solutions, such as those adopted in Kosovo or Serbia,<sup>16</sup> should be implemented and promoted. Except for banking, there are few collective action programs that would promote compliance and anti-corruption within different industries.

### 4. Party Funding and Campaign Finance

The country's governing framework for the funding of political parties and campaign finance is outdated and inadequate. Save for a minor change in 2022, the framework was last changed in 2010 and fails to account for the abilities of parties to evade legislation on political financing. The institutional framework of party financing is also inadequate, as the oversight of party and campaign finance falls under the Central Election Committee's (CEC) purview. Most countries have, in some way, involved other bodies such as the audit offices or the anti-corruption agencies in their institutional frameworks.<sup>17</sup> This policy choice leaves the BiH CEC in a difficult position to monitor the misuse of public and campaign funds but with limited power to investigate or sanction infractions. The recent 2022 General Elections exposed the CEC's lack of capacity in

<sup>12</sup> Otkrivamo: Srpska postala offshore destinacija – Slovenci u Banjaluci otvorili 200 fantomskih firmi, Capital May 14, 2020, available at [https://www.capital.ba/otkrivamo-srpska-postala-offshore-destinacija-slovenci-u-banjaluci-otvorili-200-fantomskih-firmi/?utm\\_source=Klix.ba&utm\\_medium=Clanak](https://www.capital.ba/otkrivamo-srpska-postala-offshore-destinacija-slovenci-u-banjaluci-otvorili-200-fantomskih-firmi/?utm_source=Klix.ba&utm_medium=Clanak) (last accessed);

<sup>13</sup> Interview with an economic journalist.

<sup>14</sup> Generally, see Slobodan Tomic, Regulatory Approach to Anti-Money Laundering in Online Gambling in the UK, *Financial Technology and the Law*. Springer, Cham, 2022. 47-65.

<sup>15</sup> Zakonodavstvo i praksa zaštite uzbunjivača u Bosni i Hercegovini, Transparency International BiH, <https://ti-bih.org/wp-content/uploads/2022/04/Zakonodavstvo-i-praksa-zastite-uzbunjivaca-u-BiH.pdf>, 9-12.

<sup>16</sup> Hovic N. (2019) Whistleblower Protection in Kosovo: What Role for Collective Action? In Armakolas, I., Demjaha, A., Elbasani, A., & Schwandner-Sievers, S. *Local and International Determinants of Kosovo's Statehood*, 37-66.

<sup>17</sup> The anti-corruption agency in Bosnia and Herzegovina, the Agency for Prevention of Corruption and Coordination of Fight Against Corruption, formally exists, but is, practically, a standard setting body that merely co-ordinates the anti-corruption efforts of the country.

this regard as well as the discrepancies between declared campaign funds and the actual level of campaign spending.<sup>18</sup>

This problem is closely related to the ownership of media websites used to spread disinformation. A domestic CSO dedicated to countering disinformation found that many websites appear just before elections, spreading hate speech and distorted news that favor a certain party or group of candidates.<sup>19</sup> The parties and candidates exploit these misleading news portals because there is no effective oversight over media ownership. While this is also a problem present in many other countries, the lack of prevention and fight against disinformation is more pronounced in BiH.

BiH's framework on this issue needs to not only increase investment in CEC staff dedicated to auditing but also to empower law enforcement agencies. As it is unlikely that the national anti-corruption agency may be equipped with investigatory competences, the main option would be to strengthen the investigatory capacities of prosecutors to tackle election fraud and better understand the electoral process.

## 5. Foreign Investment

In order to realize its full potential as an energy producer, BiH needs foreign investment. This simple fact, over which many observers would agree,<sup>20</sup> has unfortunately been largely ignored in the West. As a result, investments in the energy sector have been promised and made by Russian and Chinese investors. The role of the West has been largely defensive, focused more on obstructing investment from Moscow and Beijing rather than making investments of its own. Such was the case with the modernization of the Tuzla thermal power plant, an investment that was prioritized over a transition to

green energy. Currently, foreign investment screening mechanisms are either regulated by outdated treaties on mutual investment protection or remain completely unregulated.

It is clear that BiH authorities can better promote their country as a desirable destination for foreign investment. Western allies also should recognize that Russian and Chinese investments are not always driven by economic logic but by geopolitical interests. An example from neighboring Serbia is telling: investments in the Budapest-Piraeus railway, a flagship project of the Chinese presence in the Western Balkans, alarmed the EU. Brussels ultimately began to support the project not because of its economic viability but to limit China's presence.<sup>21</sup> In BiH, we still do not see this Western pushback, despite the fact that Chinese funded projects generally do not consider environmental and health concerns.<sup>22</sup>

A mechanism for screening foreign investment could be modeled after the Committee on Foreign Investment in the United States or the EU's guidance to limiting foreign investment from Russia and Belarus.<sup>23</sup> BiH should thus undertake reforms of its public procurement system, state aid mechanisms, and foreign exchange operations as already recommended.<sup>24</sup> The full functionality of this mechanism would be ensured by coordination between the countries of the region as the closeness of their economies can lead to the exploitation of lax rules in one jurisdiction and subsequently impact a neighboring country. BiH should also pursue to place this matter on the agenda of regional economic initiatives such as the Berlin Process or the Open Balkan Initiative in order to ensure a more coherent position on this issue.

<sup>18</sup> Transparency International BiH. 2020. Monitoring izborne kampanje lokalni izbori 2020. <https://ti-bih.org/wp-content/uploads/2021/05/TIBIH-Monitoring-izborne-Kampanje-2020-WEB-FIN.pdf>

<sup>19</sup> Rasvjetljavanje: "Informativni" portali koji niču pred izbore,, Istinomjer, Sep 10, 2022, <https://istinomjer.ba/rasvjetljavanje-informativni-portali-koji-nicu-pred-izbore/>

<sup>20</sup> E.g. see Nikolakakis et al. (2019). Analysis of electricity investment strategy for Bosnia and Herzegovina. *Energy Strategy Reviews*, 23, 47-56.

<sup>21</sup> Ana Curic and Attila Kálmán, From Budapest to Belgrade: a railway line increases Chinese influence in the Balkans, <https://www.investigate-europe.eu/en/2021/from-budapest-to-belgrade-a-railway-line-increases-chinese-influence-in-the-balkans/>

<sup>22</sup> Geopolitics, State Capture and Peak Corruption What is Next for Anticorruption in the Western Balkans, Southeast European Leadership for Development and Integrity, (2020), p.27.

<sup>23</sup> Guidance to the Member States concerning foreign direct investment from Russia and Belarus in view of the military aggression against Ukraine and the restrictive measures laid down in recent Council Regulations on sanctions (2022/C 151 I/01)

<sup>24</sup> Damir Asceric, Foreign Direct Investment Screening Mechanism An Outlook for Bosnia and Herzegovina Center for Civil Initiatives and Center for International Private Enterprise, (2021), p. 37-40.

## 6. Political Background of Foreign Influence

It is beyond the scope of this policy paper to recommend the reshaping of foreign policy of international actors towards BiH. Still, the two democratic actors that have acted as promoters of rule of law, democracy, Euro-Atlantic integration, and anti-corruption, namely the US and the EU, must consider that the internationalized status of the country described above significantly contributes to its exposure to foreign influence. The first step in limiting this exposure is to consider a change in the role that the Office of the High Representative will have in the future of BiH. This was envisaged more than a decade ago as a part of the so-called "5+2" agenda<sup>25</sup> and should be seen as a long-term goal that would firmly anchor the country on the path of Euro-Atlantic integration, as its citizens demand.<sup>26</sup>

Unwillingness of the EU to expand to the Western Balkans, coupled with its ineffectiveness in providing any kind of sustainable security policy towards its member states (let alone potential candidate countries), must also be reevaluated as it often contributes to the genuine need for other sources of foreign funding.<sup>27</sup> Further, individuals that are specially designated nationals and blocked persons, as well as the companies under the control of such actors, should not be engaged economically or politically by Western actors. This, in turn, will limit malign foreign influence and exercise the West's own beneficial influence.



<sup>25</sup> Goran Tirak, (2010). The Bosnian Hiatus: A Story of Misinterpretations. CEPS Policy Brief, (219).

<sup>26</sup> Bosnia and Herzegovina Poll, National Democratic Institute, May 13, 2022, <https://www.ndi.org/publications/bosnia-and-herzegovina-poll>

<sup>27</sup> Zoran Nechev et al. "Bouncing back: Completing the EU unification process." Policy brief, Balkans in Europe Policy Advisory Group (2021).

# POLICY RECOMMENDATIONS:

To the national and entity level parliaments and parliamentary committees in charge of oversight over the work of security bodies:

- ▶ Consider holding public hearings and special sessions dedicated to foreign influence and reach out to think tanks and civil society organizations in order to collect best practices useful for the development of legislative changes to the foreign investment framework.
- ▶ Demand that the strategic documents in the domains of national security, the "Security Policy of Bosnia and Herzegovina" are changed or that new documents, in particular the National Security Strategy, is drafted in order to better reflect current threats to country's security, including malign foreign influence.
- ▶ Demand that the entity and national governments prepare the mechanisms for foreign investment screening and, in the absence of such development, form ad-hoc investigative committees that would work on making foreign investment screening more stringent.

To the BiH Ministry of Justice:

- ▶ Initiate the finalization and/or improvements to the international cooperation agreements with other countries, primarily with the European Union and the United States to ensure the usage of data obtained via surveillance and data gathering.
- ▶ Propose legislation on lobbying and create lobbying registers.
- ▶ Consider leading a consultation process to unify the scope of whistleblowers' protection in both entities in order to expand protection to those in the private sector.

To the prosecutors' offices and other law enforcement institutions:

- ▶ Expand capacities for financial investigation and consider ordering a study that would map the real estate and money laundering practices in BiH's biggest cities.

To the entity-level supreme courts and the Court of BiH:

- ▶ Organize a joint panel on the harmonization of court practices regarding the usage of evidence obtained by means of mass surveillance from international sources,

To the Central Electoral Committee and the Regulatory Agency for Communication:

- ▶ Increase oversight capacities over auditing of party finances and online media during the electoral campaign.

To the entity governments:

- ▶ Create a more transparent concessions registry in both entities thereby allowing a mapping of concessions and public private partnership, their length and legal basis.

To the BiH Ministry of Security:

- ▶ Streamline the anti-corruption work of the Border Police, State Investigation and Protection Agency and the entity internal affairs ministries in preventing foreign influence.

To the entity-level justice ministries and entity-level parliament MPs:

- ▶ Propose legislation that would expand the limits of legislative protection of whistleblowers on the national and entity level.
- ▶ Modify the whistleblowers' protection scope to include the protection of whistleblowers in the private sector.

To the BiH Ministry of Foreign Trade and Economic Relations and Ministry of Foreign Affairs:

- ▶ Consider proposing a joint investment screening mechanism for Western Balkan countries as a part of the Berlin Process or to the Open Balkan Initiative should BiH commit to that process.
- ▶ Coordinate efforts to promote the country as a favorable destination for investment.

To the national and entity-level chambers of commerce:

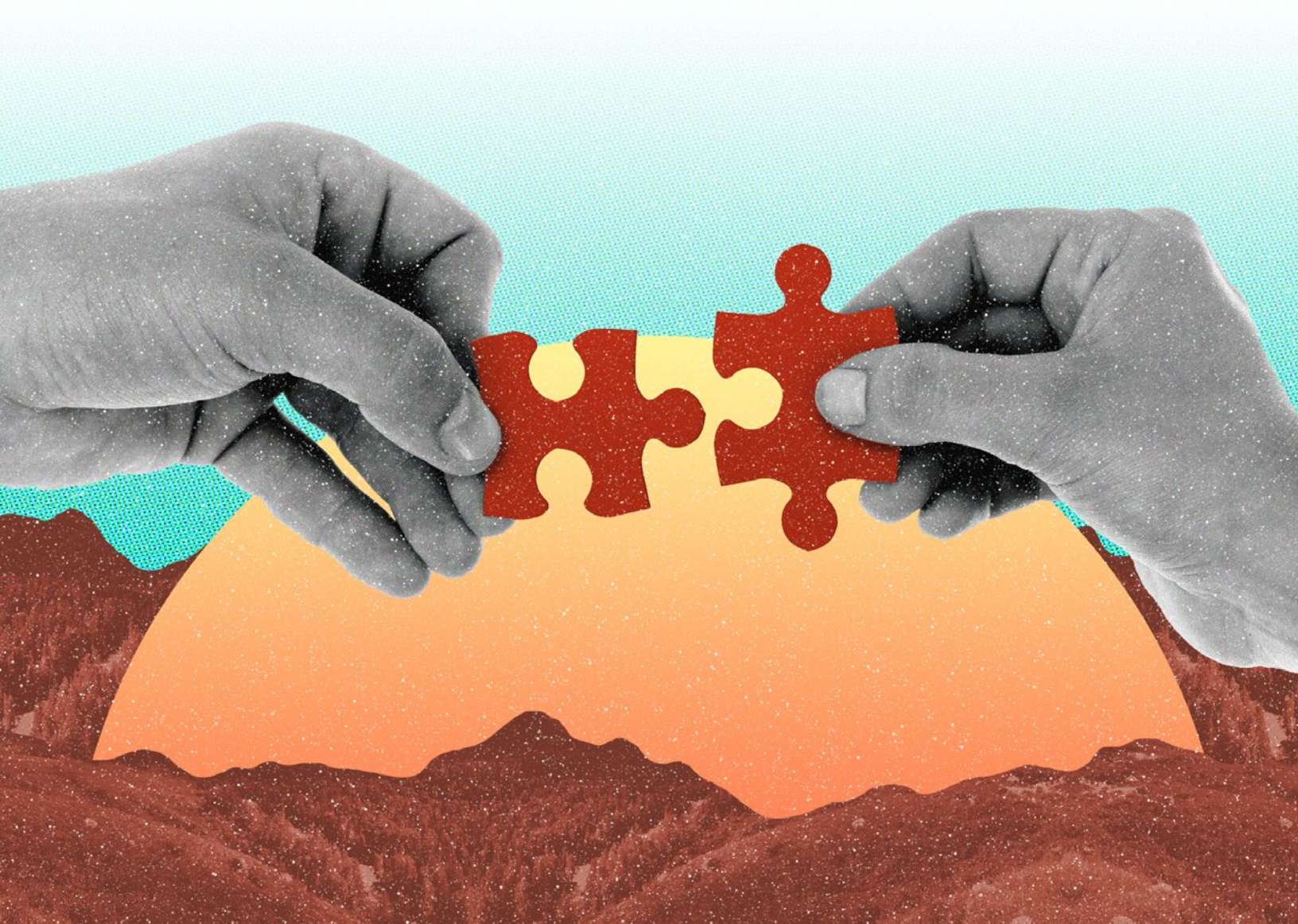
- ▶ Promote compliance and anti-corruption programs for BiH companies

To the European Union Special Representative in BiH:

- ▶ Alert the European Commission to the need to promote more meaningful investment engagement for BiH and the countries of the Western Balkans as its current policies invite foreign influence.

To the United States Agency for International Development, Mission in Sarajevo:

- ▶ Invest in capacity building for domestic actors for foreign influence prevention.



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