Table of contents - Serbia

How to report corruption and receive legal protection?
Basic information about whistleblowing 4
What is whistleblowing?4
Who can be a whistleblower?4
When does the whistleblower have the right to protection?4
Is anonymous whistleblowing allowed?5
Is corruption reporting by whistleblower treated as confidential?
What kind of irregularities can be reported?5
Is it necessary to have evidence in order to report corruption or it is sufficient to have reasonable grounds to believe?
What protection does the Law provide to whistleblowers?6
What is abuse of whistleblowing and what are its consequences?
Are whistleblowers exempt from disciplinary, civil or criminal liability?6
Whistleblowing procedure
What types of whistleblowing exist?7
To whom is internal whistleblowing made and how?7
What procedure is conducted after receiving internal whistleblowing report?
What is external whistleblowing?8
What type of procedure is conducted after receiving external whistleblowing report?
What is whistleblowing made to the public?9
Whistleblower protection from detrimental actions11
Against which retaliation is protection provided?11
What kind of protection is available for whistleblowers who are experiencing retaliation?11
To who and within what time frame is a lawsuit filed?12
What is temporary court measure?13
Which court is to be addressed to annul the decision on dismissal if the whistleblower was dismissed from work?13
Legal aid
Who can whistleblower address for obtaining legal aid?15

What additional information on whistleblowing are available?	15
Additional sources of information	16

How to report corruption and receive legal protection?

This content aims to provide the public with information on the possibilities of protected reporting of corruption in Republic of Serbia. Presented below is the information on what protected reporting involves, who can report corruption, and which irregularities can be reported. Information on how one can submit a report and where it can be submitted will also be included herein. The following content provides information on the possibilities for protection against detrimental actions that may be taken to deter someone from making the report or in retaliation for the filed report.

Based on the information provided below, it is possible to assess information at one's disposal, which may indicate corruption, and decide if it provides a basis for protected reporting of corruption, as well as possible consequences of both reporting corruption and abusing the reporting of corruption.

This content was prepared based on the applicable regulations, primarily the Law on Protection of Whistleblowers. The information provided here do not constitute legal advice; for this purpose it is recommended is to consult the law in more detail and address the competent authorities. The following content also provides information about institutions and organizations providing legal aid.

Basic information about whistleblowing

What is whistleblowing?

According to the Law on Protection of Whistleblowers (Republic of Serbia Official Gazette, 128/2014, available at <u>https://www.pravno-informacioni-sistem.rs/SIGIasnikPortal/eli/rep/sgrs/skupstina/zakon/2014/128/1/reg</u>, hereinafter: the Law).

whistleblowing is disclosure of information regarding violation of regulations, violation of human rights, discharge of public authority contrary to the purpose for which they were entrusted, danger to life, public health, safety, and environment, as well as for the purpose of preventing damage of greater scope.

Whistleblowing is not limited to one area. Any violation of regulation can be reported, no matter how big or small the damage caused by that violation is.

Who can be a whistleblower?

Whistleblower is exclusively a natural person. Legal persons cannot be whistleblowers.

The whistleblowers do not have to be permanently employed with the employer to which the whistleblowing refers. The Law stipulates that the whistleblower can have work engagement, which entails all types of employment relationships – permanent employment, fixed-term employment, part-time employment, volunteering, exercising of a function.

The whistleblowers can be candidates in a recruitment process (persons who had noticed certain irregularities during the recruitment process and filed a report) and persons using services of government and other bodies, holders of public authority or public services. Furthermore, whistleblowers can be persons who have business cooperation with a government or private company or right of ownership in a company (co-owners, shareholders).

When does the whistleblower have the right to protection?

The whistleblower has the right to protection if three conditions are met:

1. The whistleblower must perform whistleblowing action with an employer or an authorised body (public prosecutor's office, inspection, Agency for prevention of corruption, Ombudsman...) or alarm the public in the manner prescribed by the Law. The whistleblower can choose the way in which he/she will perform whistleblowing action, whereas special rules are applicable to disclosure of information to the public. There has to be direct threat to life, public health, safety, environment, danger of occurrence of large-scale damage i.e. danger that the evidence might be destroyed in order to alert the public before whistleblowing action is taken though the employer or an authorised body;

2. The whistleblower must disclose information within one year from the date of learning about the act for which whistleblowing action is undertaken (subjective deadline) and no later than ten years from the date such an act was performed (objective deadline);

3. The information disclosed by the whistleblower must, at the time of whistleblowing, be such that a person with average knowledge and experience, similar to that of the whistleblower, may believe its truthfulness. If, after the action taken by the competent authorities, such information turns out to be untrue, the whistleblower will not suffer any negative consequences and will not held accountable for abuse.

Is anonymous whistleblowing allowed?

Anonymous whistleblowing is allowed and the competent bodies are obligated to undertake actions upon anonymous reports.

Is corruption reporting by whistleblower treated as confidential?

A person authorised to receive information is obliged to protect the whistleblower's personal data, i.e. data based on which the identity of a whistleblower may be revealed, unless the whistleblower consents to the disclosure of such data, in line with the Personal Data Protection Law (Official Gazette of Republic of Serbia, 87/2018).

Additionally, any person who learns about the data is obliged to protect such data.

The person authorised to receive the information must inform the whistleblower at the moment of receiving the information that his/her identity may be revealed to the competent authority, if it would not be able to take any measures without disclosure of whistleblower's identity, and about the protection measures for participants in criminal proceedings.

If it is necessary to disclose identity of the whistleblower in the course of the proceedings, the person authorised to receive information has to inform the whistleblower thereof before disclosing his/her identity.

The whistleblower's personal data must not be communicated to the person referred to in such information, unless otherwise prescribed by a special law, e.g. in criminal proceedings.

What kind of irregularities can be reported?

Whistleblower can report any violation of regulations.

Is it necessary to have evidence in order to report corruption or it is sufficient to have reasonable grounds to believe?

It is sufficient for the whistleblower to disclose the information that, at the time of whistleblowing, is such that a person with average knowledge and experience, similar to that of the whistleblower, may believe it is true. This allows for investigation of what the whistleblower reported, and not of the whistleblower's motives to report an irregularity.

Whistleblower is not held accountability for accuracy of the information. If, after the action taken by the competent authorities, such information turns out to be untrue, the whistleblower will not suffer any negative consequences and will not held accountable for abuse.

What protection does the Law provide to whistleblowers?

Whistleblowers have the right to judicial protection if they are suffering harm due to whistleblowing.

All employers are obligated to protect the employees who report any kind of abuse. Violation of that obligation carries misdemeanour penalties.

The Law does not prescribe any other protection, by a body such as prosecutor's office or the Agency for prevention of corruption.

Other persons who are not whistleblowers also have the right to protection:

1. Related person – if he/she makes it probable that a detrimental action has been undertaken against him/her, due to his/her connection to the whistleblower (this particularly relates to family members or colleagues who help the whistleblower to file a report).

2. Person mistakenly considered to be whistleblower- is such a person makes it probable that a detrimental action has been undertaken against him/her, because the person undertaking such a detrimental action, has mistakenly considered such a person to be a whistleblower, i.e. an associated person.

3. Person acting in official capacity - has the right to protection as a whistleblower, if during the exercise of official duty he/she disclosed information and made it probable that a detrimental action had been undertaken against him/her due to his/her disclosure of such information.

4. Person requesting data concerning the information— if he/she makes it probable that a detrimental action has been undertaken against him/her for having requested such data.

What is abuse of whistleblowing and what are its consequences?

Abuse of whistleblowing means any action of the person who submits information that he/she knows is untrue or asks for illicit proceeds in exchange for the information.

Such a person has no right to judicial protection.

Are whistleblowers exempt from disciplinary, civil or criminal liability?

Whistleblowers are not *a priori* protected from disciplinary, civil and criminal liability. However, it they can prove likelihood that disciplinary or any other procedures are retaliation for whistleblowing, the whistleblower has the right to judicial protection.

Whistleblowing procedure

What types of whistleblowing exist?

The Law prescribes three types of whistleblowing: internal (to the employer), external (to authorised body) and public (through the media or in any other public way).

Whistleblower can carry our either internal or external whistleblowing action. Whistleblower does not have to do internal whistleblowing action to be allowed to conduct external whistleblowing.

The public can be alerted only after report was made to the employer or authorised body.

To whom is internal whistleblowing made and how?

Internal whistleblowing is disclosure of information to a person authorised by the employer to receive the information and conduct the proceedings concerning the whistleblowing. This person is obligated to act upon such information without any delay, no later than within 15 days from the date of receipt of such information. Furthermore, the authorised person, as well as any other person who comes across the whistleblower's personal data, is obligated to protect his/her data. This person is obligated to provide all information about the proceedings to the whistleblower, as well as to make all documentation related to whistleblowing available.

Written submission of information regarding whistleblowing can be done by direct delivery of information regarding whistleblowing, by regular or registered mail, as well as by electronic mail, in accordance with the law, if the technical conditions are in place.

Oral delivery of information regarding internal whistleblowing is done orally on the record.

In accordance with the Law, an employer is a body of the Republic of Serbia, a territorial autonomy or a local self-government unit, a holder of public authority or a public service, a legal person (regardless of the ownership structure) or an entrepreneur who employs one or several persons.

Any employer, regardless of the number of employees, is obliged:

• To send a written notification regarding the rights stemming from the Law on Protection of Whistleblowers to all work engaged persons

• To appoint the person authorised to receive the information and conduct of the proceedings regarding whistleblowing

• To undertake measures, within the scope of its authority, for the purpose of eliminating identified irregularities related to the whistleblowing

• To protect the whistleblower, within the scope of its authority, against the detrimental action, as well as to undertake necessary measures for the purpose of suspending such detrimental action and removing consequences thereof

• Not to undertake measures with the aim of disclosing the identity of the anonymous whistleblower

• To inform the whistleblower on disclosure of his/her identity in advance, if such an action would be required under the procedure of competent authorities as a way to examine the information.

In addition to the obligations that every employer has regardless of the number of employees, an employer with more than ten employees is also obliged to regulate the internal whistleblowing procedure by regulation (general act). The employer is obliged to display the act in a visible place, accessible to every employee, and to publish it on its website (if technically possible). The provisions of the rulebook on the internal whistleblowing procedure must be in accordance with the Law on Protection of Whistleblowers and the by-law of the minister responsible for judicial affairs (Rulebook on Internal Whistleblowing, Official Gazette of the Republic of Serbia, 49/2015 and 44/2018, available at

https://www.pravno-informacioni-

sistem.rs/SIGlasnikPortal/eli/rep/sgrs/ministarstva/pravilnik/2015/49/1/reg)

which more closely regulates the method of how is internal whistleblowing conducted, the method of determining the authorised person of the employer, as well as other issues of importance for internal whistleblowing with an employer that has more than ten employees. Provisions of the employer's rulebook that are not in accordance with the Law on the Protection of Whistleblowers and the regulations adopted on the basis of the law are null and void.

What procedure is conducted after receiving internal whistleblowing report?

The internal whistleblowing procedure begins with the delivery of information to the employer or a person authorised by the employer to receive information and conduct the whistleblowing proceedings. The deadline under which the employer has to react in line with the Law begins to run from the moment information is delivered.

The employer is obliged to act on the information without any delay, and no later than within 15 days from the day of receipt of such information. The employer is obliged to inform the whistleblower about the outcome of the procedure within 15 days from the completion of the internal whistleblowing procedure. The employer is obliged, at the whistleblower's request, to provide information to the whistleblower about the progress of the procedure and actions taken, as well as to enable the whistleblower to inspect the case files and to be present for any actions under the proceedings.

The employer is obliged to take measures within the scope of its authority to eliminate the identified irregularities.

What is external whistleblowing?

External whistleblowing is the disclosure of information to an authorised body outside the employer, which can be the public prosecutor's office, the competent inspection, the Commissioner for Information of Public Importance, the Agency for the Prevention of Corruption or another body.

An authorised body is the body of the Republic of Serbia (e.g. the National Assembly, the Government of the RS, the President of the RS, the Constitutional Court, ministries, inspections, the Agency for the

Prevention of Corruption, the Commissioner for Information of Public Importance, numerous Republic's agencies, institutes, directorates, funds...), territorial autonomies (Assembly of AP Vojvodina, Government of AP Vojvodina, provincial secretariats, provincial funds...), local self-government units - municipalities, cities and the City of Belgrade (municipal/city assembly, municipal president/city mayor, institutes, funds, institutions and public companies whose founder is a local self-government...) or a holder of public authority (bar association, chambers in the field of health...) competent to act on the information used for whistleblowing, in accordance with a special law that regulates a certain legal area. Thus, if information about the conflict of interest of officials is revealed, the authorized body is the Agency for the Fight against Corruption. If information is disclosed that your employer hires workers without concluding any employment contract ("unreported employment"), the authorised body is the labour inspection.

What type of procedure is conducted after receiving external whistleblowing report?

The procedure of external whistleblowing commences upon submission of information, as well as evidence, if in possession of the whistleblower, to an authorised body. In case whistleblowing refers to work-engaged persons within an authorised body, the whistleblower will address manager of such authority, and in case whistleblowing refers to the manager of the authorised body, the whistleblower will address the manager of the directly supervising body.

The authorised body is obliged to act upon information used to perform external whistleblowing action within 15 days from the date of receipt of such information. The authorised body is obliged, at the whistleblower's request, to provide information to the whistleblower about the progress of procedure and actions taken, as well as to enable the whistleblower to inspect the case files and to be present for any actions under way. The authorised body is obliged to inform the whistleblower about the outcome of the procedure upon its completion, in line with the law.

In case the authority, to which the information has been submitted, is not competent to act in terms of whistleblowing, it is obligated to forward the information to the competent authority within 15 days from the date of receipt and will, at the same time, inform the whistleblower thereof.

In case the whistleblower has not given approval for his/her identity to be disclosed, the authorised body, which has received the notification from the whistleblower, and which is not competent to act, is obliged to seek approval from the whistleblower, prior to forwarding such notification to the authorised body, unless otherwise prescribed by the law.

What is whistleblowing made to the public?

Alerting the public is disclosure of information through the media, the Internet, public meetings, or in any other way by which the information can be made available to the public.

The public can be alerted only after report was made to the employer or authorised body. The public may be alerted, without prior notification of the employer or an authorised body, in case of imminent danger to life, public health, safety, environment, possible occurrence of damage of large scope, i.e. in case of imminent danger of destruction of evidence. During the procedure of whistleblowing to the public, the whistleblower is obliged to respect the assumption of innocence of the accused, the right to protection of personal data, as well as not to jeopardize conduct of court proceedings. In case the information contains classified data, the whistleblower is obliged to first address the employer, and in case the information refers to the person who has been authorised to act upon such information, the information is submitted to the manager of the employer. If the information refers to the manager of the employer, such information is to be submitted to an authorised body.

If the employer fails to act upon the information containing classified data within 15 days, i.e. in case he/she has failed to respond or to take appropriate measures within the scope of its authority, the whistleblower may address the authorized body.

In case the information contains classified data, the whistleblower who is obligated to keep the information confidential, cannot alert the public, and has to address the employer. If the employer fails to react within 15 days, the whistleblower then can address authorised body.

Secret data is considered to be data that has been previously marked as secret in accordance with the regulations on data secrecy. Information marked as secret for the purpose of concealing a criminal offense or exceeding the powers or abuse of office or other illegal act or action of a public authority are not considered secret information.

It is set forth that an employer – legal person will be imposed a fine in the amount of RSD 50,000 to 500,000, the responsible person in the legal person, government body, body of territorial autonomy or local self-government unit will be imposed a fine in the amount of RSD 10,000 to 100,000, while an entrepreneur will be imposed a fine in the amount of RSD 200,000 if:

1. He/she fails to protect the whistleblower against the detrimental action or fails to take the required measures for removal of detrimental action and removal of consequences of detrimental actions, within the scope of its authority

2. He/she fails to deliver a written notification on rights under this Law to all work engaged persons

3. He/she fails to appoint person authorised to receive the information and to conduct the procedure regarding whistleblowing

4. He/she fails to act upon the information within the statutory deadline

5. He/she fails to inform the whistleblower of the outcome of the proceedings, in line with this Law, and within the statutory deadline 6. upon the request of the whistleblower, he/she fails to notify the whistleblower about the progress of the procedure and actions taken, as well as to enable access to the whistleblower to case files and to be present for any actions under the proceeding, in line with the law.

Whistleblower protection from detrimental actions

Against which retaliation is protection provided?

The Law sets forth that an employer must not, by action or omission, place the whistleblower in an unfavourable position due to the fact that he/she report an abuse, particularly if such an unfavourable position refers to:

- 1) employment;
- 2) obtaining the status of a trainee or a volunteer;
- 3) work outside employment;
- 4) education, training or professional development;
- 5) promotion at work, work appraisal, obtaining or loss of title;
- 6) disciplinary measures and penalties;
- 7) working conditions;
- 8) termination of employment;
- 9) wages and other remunerations;
- 10) share in employer's profit;
- 11) payment of stimulation and severance pay;
- 12) placement and transfer to another position;

13) failure to take measures of protection against harassment by other persons;

14) referral to mandatory health examinations and referral to examinations for the purpose of assessing work capacity.

Putting the whistleblower in an unfavourable position by acts or omissions due to whistleblowing constitutes detrimental action for which the whistleblower has the right to judicial protection.

What kind of protection is available for whistleblowers who are experiencing retaliation?

The whistleblower can seek protection from the court through a lawsuit when a detrimental action is taken against him/her, that is, when he/she is suffering retaliation.

To who and within what time frame is a lawsuit filed?

A whistleblower protection lawsuit if filed with a higher court. The higher court is competent according to the place where the detrimental actions took place or according to the place of residence of the whistleblower. The higher court decides in the first instance, and in the decision in appellate procedure is made by the Appellate Court. A lawsuit for protection related to whistleblowing is filed within six months from the time the whistleblower learns about the detrimental action taken against him/him, that is, within three years from when the detrimental action against the whistleblower was taken. The deadline of six months is called the subjective deadline, and the deadline of three years - the objective deadline. If the lawsuit is not filed within these deadlines, the statute of limitations begins, i.e. the right to judicial protection in relation to a specific detrimental action is lost. The procedure is urgent.

The contents of the lawsuit is set forth by the Law on Civil Proceedings (https://www.pravno-informacionisistem.rs/SIGlasnikPortal/eli/rep/sgrs/skupstina/zakon/2011/72/2/reg) – designation of the court, name and surname, business name and surname of a company or other entity, permanent or temporary place of residence, i.e. headquarters of the parties, their legal representatives and proxies if any, the subject of the dispute, the claim concerning the subject matter and secondary claims, the evidence establishing these facts, the value of the subject of the dispute, the signature of the plaintiff.

The lawsuit concerning whistleblowing may contain one or more claims. The claims may seek:

- To determine that a detrimental action was taken against the claimant
- To prohibit such an action and its being repeated
- Removing the consequences of detrimental action
- Compensation for damage, material and non-material
- Publication of the verdict in a news outlet, with defendant covering the expenses.

The burden of proof is on the defendant. This means that if during the proceedings (in a labour dispute) the claimant, i.e. the whistleblower, makes it probable that a detrimental action (e.g. dismissal) was taken in connection with the whistleblowing, then the burden of proof is on the defendant i.e. the employer. The employer i.e. the defendant will have to prove that the detrimental action is not related to whistleblowing in order to succeed in the dispute.

In a whistleblower protection proceeding, the whistleblower is not required to prove his/her claims but to make them probable. When the whistleblower indicates a possible causal link between the dismissal and the whistleblowing, the burden of proof in the further course of the process is on the defendant, who must prove that the detrimental action is not related to the whistleblowing.

In whistleblower protection proceedings the court has the right to ask for certain evidence to be introduced for the purpose of establishing facts of importance for the outcome of the proceeding, regardless of whether the presentation of such evidence was proposed by the parties. The court is also authorised to determine facts that are not contested by neither of the parties. Namely, in the whistleblower protection proceeding there is an exception from the general rule where the court may,

aimed at more effective protection of whistleblowers and determination of the truth, order presentation of certain evidence, regardless of whether the parties have foreseen it, and establish facts that are not in dispute between the parties, but are important. If the whistleblower is not aware that there is evidence that can help him/him, does not know about it or overlooks it for any other reason, then the court can present that evidence instead of him/her and thereby significantly influencing the outcome of the proceedings and thus helping the whistleblower.

What is temporary court measure?

The temporary measure allows the court to immediately stop the retaliation against the whistleblower and to prevent it while the court proceedings are ongoing. This means, for example, that a high court can reinstate a dismissed whistleblower and allow him/her to work and earn while the court case with the employer is pending. The whistleblower can submit a motion for temporary measures before filing a whistleblowing lawsuit, during the main hearing, and even after the end of the procedure, until the enforcement is conducted.

The court determines a temporary measure at the request of a party, but it can also determine it ex officio. A temporary measure can be used to request a ban on conduct of a detrimental action, delay of enforcement of an individual act, as well as elimination of the consequences caused by a detrimental action. Provisional measures are determined by the court in accordance with the Law on Enforcement and Security (<u>https://www.pravno-informacioni-sistem.rs/SIGlasnikPortal/eli/rep/sgrs/skupstina/zakon/2015/106/1/reg/20200204</u>).

If the motion for determining a temporary measure is submitted before the lawsuit, the whistleblower submits such a motion to a higher court. The higher court decides whether it will adopt the motion for determining a temporary measure, i.e. whether it will stop retaliation against the whistleblower in the form of dismissal, for example. If the higher court determines a temporary measure, then it will also determine the deadline for submitting a lawsuit to the competent court - basic, administrative or higher court to challenge the act by which the employer retaliates. The court will indicate the court in its decision.

If it is a matter of dismissal or transfer to a worse position, the lawsuit is submitted to the basic or administrative court. If a whistleblower, for example, suffers harassment at work but is still with the same employer at the same position, a whistleblower protection lawsuit is brought before a higher court.

Which court is to be addressed to annul the decision on dismissal if the whistleblower was dismissed from work?

The higher court can issue a temporary measure by which the whistleblower, if the court establishes that he/she was dismissed due to whistleblowing, is immediately reinstated to work, but this temporary measure does not annul the decision on dismissal. This decision is challenged in a separate process, by a separate lawsuit of the whistleblower filed under a labour dispute, during which the whistleblower is protected by a temporary measure of the higher court. The law stipulates that the legality of an individual act of the employer which decided on the employment-related rights, obligations and responsibilities of the employee (for example, dismissal) cannot be disputed with a lawsuit related to whistleblowing, but must be done in a separate dispute, i.e. in a labour dispute. This means that the whistleblower who was dismissed must file a lawsuit for annulment of such a decision either before a court of general jurisdiction (basic court) or before a court of special jurisdiction (administrative court). These courts evaluate the

legality of acts that violate the rights of employees with the application of special regulations - the Labour Law, the Law on Civil Servants, etc. In a labour dispute initiated before a basic or administrative court for the annulment of an illegal decision, the plaintiff should state that the unlawful act was enacted because of whistleblowing. Noting allegations that an individual act of the employer (e.g. the decision on the termination of the employment contract) represents a detrimental action connected to whistleblowing must be given either in the lawsuit or at the latest at the preliminary hearing, and after than only if the plaintiff makes it probable that he could not present that statement earlier without incriminating himself/herself.

Legal aid

Who can whistleblower address for obtaining legal aid?

The law does not stipulate that any state body provides legal assistance to whistleblowers. According to the Law on Free Legal Aid (Official Gazette of RS, no. 87 of November 13, 2018), the right to free legal aid from a lawyer can be obtained by a person who:

1) meets the conditions to be a beneficiary of financial welfare assistance in accordance with the law regulating social protection or a beneficiary of the child allowance in accordance with the law regulating financial support to families with children, as well as to members of his family, i.e. a joint household, the scope of which is determined by these laws;

2) does not meet the conditions to be a beneficiary of financial social assistance or child allowance, but would have met all the conditions for becoming the beneficiary of financial social aid or child allowance due to payment of legal aid from his/her incomes in the specific legal matter.

In these cases, the state assumes the obligation to pay legal fees.

The Ministry of Justice keeps a list of registered providers of fee legal aid: <u>https://www.mpravde.gov.rs/sr/tekst/26374/spisak-registrovanih-pruzalaca-besplatne-pravne-podrske.php</u>

The only organisation providing legal aid to whistleblowers is *Pištaljka* (pistaljka.rs). This legal aid includes advice, representation and is free.

What additional information on whistleblowing are available?

In 2015 the Ministry of Justice published a short guide through the Law on Protection of Whistleblowers:

https://www.mpravde.gov.rs/sekcija/9719/sve-o-uzbunjivacima-.php.

Government Accountability Initiative, USAID's project, had in 2019, with the assistance of *Pištaljka*, published recommendations for rulebooks on internal whistleblowing in local self-governments (<u>https://www.odgovornavlast.rs/wp-content/uploads/2019/09/USAID-GAI-i-Pistaljka_Preporuke-za-pravilnike-o-uzbunjivanju-za-JSL-1.pdf</u>).

In 2015 Pištaljka published a Manual for whistleblowers that is available at <u>https://pistaljka.rs/public/banners/prirucnik_za_uzbunjivace.pdf</u>.

Transparency Serbia had in 2017 released the publication "Law on Protection of Whistleblowers: What is the meaning of norms and where they can be improved", which is available at

https://www.transparentnost.org.rs/images/stories/inicijativeianalize/Zakon%20o%20zastiti%20uzbunji vaca%20-%20koje%20znacenje%20normi%20igde%20se%20mogu%20poboljsati.pdf

Additional sources of information

Commentary on the Law on Protection of Whistleblowers, authors Mirjana Martić and Marijana Šarac, was published in 2015. Information about this book, whose electronic version is not available, can be found at <u>link</u>.