American Chamber of Commerce in Kosovo & the USAID Commercial Justice Activity

2021 Corruption Perception Study

Stop Corruption
2021 Corruption Perception Study

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Authors:
Arian Zeka
Andina Vllahiu Kelmendi

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Executive Summary

The Corruption Perception Study conducted by the American Chamber of Commerce over the last four years has shown that the level of corruption is increasing year by year, making it impossible for businesses, in different sectors, to function properly and affecting the overall social and economic development of Kosovo. Nevertheless, this year’s study shows an increase in optimism of businesses regarding the commitment of the new Government which has been in power since March 2021 to fight corruption.

According to the survey conducted with 121 enterprises, in all regions and municipalities of Kosovo, labor force migration is ranked as the first problem faced by businesses in Kosovo, as per 55.37% of respondents, while corruption this year is reported as the second problem faced by businesses as per 43.80% of respondents. The COVID19 pandemic is ranked in a lower position compared to the previous year, and this may be a result of the alleviation of restrictive measures.

This year, around 12% of respondents believe that compared to five years ago, corruption in Kosovo has increased, which compared to last year’s Study has shown a major decrease.

Bribery remains the most common type of corruption in Kosovo, followed by abuse of public funds, nepotism and cronyism, and public procurement specification to favor individual bidders.

Weak rule of law is still reported to be the number one factor contributing to the presence of corruption, according to businesses, by more than 83% of respondents, thus marking a low increase compared to the 2020 Study, followed by the lack of political will to fight corruption by 61% of businesses, which compared to last year’s Study has shown quite a huge decrease.

Nearly 30% of respondents have given a negative answer about their trust in the justice system, marking a decrease when compared to the 2020 Study, while around 11% of them have assessed their trust as partial, in this system, which compared to the 2020 survey this decreased.

In addition, 17% of respondents have claimed that they do not believe in the enforcement mechanisms, i.e., police, prosecutor’s office and courts in Kosovo, are effective in the fight against corruption, which marks a huge decrease from last year’s Study, which marked 50% of respondents not believing in these enforcement mechanisms.

Over 88% of businesses have indicated that they have never reported corruption cases to the authorities, which has increased from last year, and continues to be worrisome. It is inevitable that the high level of corruption impedes growth of foreign direct investment, with nearly 90% of business individuals sharing the same opinion.

The 2021 survey has revealed that the procurement review body is the most perceived corrupted institution, and this in the view of 57%, followed by courts as per the opinion of around 50%, and publicly-owned enterprises with 49%, municipalities with 47%, customs with 43%, leaving the Government as the sixth in the row, with 41%. It is highly interesting to see these changes, since 2021 marks the first year that businesses have not chosen the Government as the most corrupted institution.
When it comes to the perceived corruption by business functions, 41% of respondents believe that corruption is present more in audit & accounting, followed by 39% of respondents who believe that corruption occurs in sales, and slightly around 38% of the respondents who believe that corruption is present in legal services, as well. The latter is particularly concerning, knowing that accountancy professionals have an important role to play in fighting of informal economy as well.

Similarly, to previous years, the percentage of respondents who have reported corruption remains very low. This year, only 11.57% of respondents have claimed to have reported corruption, which marks a decrease from last year’s Study. Finally, this year’s survey finds that the percentage of those who have reported corruption in the Anti-Corruption Agency has increased from 22% to 50%, compared to 2020.
Introduction

The 2021 Corruption Perception Study is the fourth annual publication of the American Chamber of Commerce in Kosovo, which in the last three years was conducted in partnership with the USAID Commercial Justice Activity Program (CJA).

The 2021 survey was conducted with 239 respondents, however for purposes of generating reliable findings on the perception of corruption in Kosovo, AmCham and USAID CJA have analyzed only fully completed surveys, i.e., of 121 businesses of all sizes and sectors around Kosovo via internet-based survey platforms.

The 2021 Study measures for the second time in a row perception and encountered corruption within the private sector, i.e., in business-to-business transactions, whereas for the first time it measures also perception and encountered corruption in international organizations. Finally, this year’s study measures the ‘pulse’ of businesses on the commitment of the new Government to fight corruption.

1. Methodology

This year’s Corruption Perception Study was conducted over the internet, with 121 fully completed surveys by companies of all sizes in the seven regions of Kosovo: Prishtina (66%), Ferizaj (4.13%), Gjilan, Mitrovica and Prizren (3.31% each), Peja and Gjakova (1.65% each) and other municipalities throughout Kosovo (16.53%).

Almost two thirds of respondents, employ 1-10 people and this in line with the structure of the businesses throughout the Kosovo with small businesses dominating this structure. This is followed by 16.5% of respondents who employ 51-250 people, and 14.05% of respondent companies who employ between 11-50, and finally 6.61% of respondents who employ over 250 people.

Fig. 1.1. Respondents by number of employees
Two thirds of respondents operate in sectors such as business advisory services (14.88%), trade (14.05%), financial services (13.22%), manufacturing (12.40%), IT (10.74%), construction and real-estate (7.44%), while the remaining respondents have diversified business operations (27.27%).
2. 2021 Corruption Perception Study

Corruption affects private sector enterprises in numerous ways and forms. It is a critical barrier towards competition, because companies that do not engage in corruptive behaviors are excluded from equal market opportunities. This ultimately has an impact in the entire chain of growth and development. Corruption drains the public funds and minimizes the quality of public services and goods.

![Graph showing the main problems businesses face](image)

**Fig. 2.1. The main problems that businesses face today**

Corruption remains ranked as the second most pressing problem that businesses in Kosovo face, and this is according to around 44% of respondents, with a significant decrease from the previous year. On top of the list is migration of labor force, as selected by over 55% of respondents. And this is also in line with the concern which was shared mostly in the recent months. Only a year ago, this issue was reported as the fifth most pressing problem for businesses in the country, with COVID19 pandemic ending up as the ‘champion’ in this category in 2020.

Human capital and issues related to it seem to be among the top-three issues businesses are facing at the moment in Kosovo, with undeveloped education system being selected by around 40% of respondents. COVID19 seems to have lost its ‘importance’ as being problematic, as this year it is ranked in sixth place, and it remains a problem for 37% of respondents only. Fourth place is reserved this year as well, similarly to last year, for the inefficient court system.

There is a significant drop in percentage of businesses that believe that corruption is a very critical issue in Kosovo with this year this being shared by less than 50% of respondents, compared to around 78% of respondents in the previous year. It should be noted that the respondents base was almost the same between the two years.

In 2021 businesses have reported the issue of corruption to still be critical but less alarming. The percentage of respondents who believe that corruption is a critical issue, but not to an alarming extent has marked an increase compared to the previous year with around 39% of respondents versus around 13% in 2020. There is also an increase of businesses who this year believe that corruption is not a critical issue in Kosovo at 4%,
compared to less than 2% in the previous year. Another positive result, is that this year none of the respondents denies the existence of corruption in Kosovo, as shown in the graph 2.2. below.

**Fig. 2.2. Which of the above best reflects the current state of corruption in Kosovo?**

**Fig. 2.3. Which of the above stances best reflects the current state of corruption in Kosovo?**

The graph 2.3. above shows that when it comes to the stance of businesses on the state of corruption in Kosovo, 45.45% of respondents believe that Kosovo has a sporadic corruption, followed by 43.80% of those who believe that the corruption is systemic, and 4.13% of those who believe that the level of corruption in Kosovo is low, which is equal to the percentage of those who believe that corruption is not a critical issue in Kosovo.

Around 58% of respondents believe that the current Government, which is been in place from March 2021, is committed to fighting Government. Out of this percentage, 47% believe though that the results are still lacking, while 11% believe that the results are notable. Around 15% of respondents expect demonstration of commitment in the near
future, whereas nearly 20% of them are more pessimistic voicing their skepticism regarding the changes in commitment of the Government in the war against corruption. The detailed findings are presented in the graph 2.4. below.

**Fig. 2.4. Do you believe the current Government is committed to fighting corruption?**

 Asked to compare the changes in level of corruption, 57% of respondents reported that corruption does not seem to have marked any change in the last 5 years. Roughly a quarter of respondents believe that it has decreased, whereas around 11% of them, believe that it has actually increased compared to five years ago. Compared to last year, there seems to be positive perception regarding the changes in the level of corruption in a five-year span period. In 2020, over 41% of respondents had expressed that corruption has actually increased in the last five years, whereas around 35% believed that it remained the same, and only around 11% that it actually marked a decrease in the last five years.

This year, in general a more positive tone has been noted regarding the perception of corruption presence and the efforts being taken to fight it, including the commitment of the government to fight this phenomenon. Hopefully, concrete measures will be taken by the government and the respective bodies to fight construction and avoid any possible disappointment within the private sector.

**Fig. 2.5. Changes in the level of corruption compared to 5 years ago?**
There does not seem to be any correlation between the COVID-19 pandemic and deterioration in the levels of corruption in Kosovo, with 42% of businesses believing that the pandemic did not have any significant impact in the levels of corruption and 28% of them believing that it did, as shown in the graph below. This is an improvement from last year, where nearly 40% had reported that COVID-19 has had an effect in the increase of corruption, as shown in the graph 2.6. below.

**Fig. 2.6. Has COVID19 impacted the corruption levels in Kosovo?**

When it comes to the perceived forms of corruption, bribery is ranked first with almost 62% of respondents evaluating it as the most present form of corruption. This may also be because of the fact that most people relate corruption to bribery. Bribery is followed by the misuse of public funds, as per the views of around 58% of respondents, and nepotism and clientelism as per the views of 52% of respondents. These have been the top three forms of corruptions reported over the past 3 years.

**Fig. 2.7. Perceived forms of corruption in Kosovo**
This year’s findings in the aforementioned indicator are absolutely comparable in terms of ranking with last year’s findings as well as the 2019 ones. And this applies for other forms of corruption as well.

The same findings apply for the reasons that motivate businesses to get involved in corruption as well compared to last year as well. Around 72% of respondents mention obtaining a favorable treatment in an open/competitive procedure compared to around 71% of respondents in 2020. Accelerating a bureaucratic procedure is the second reason ranked by around 68% of respondents this year, and it was the second ranked reason in 2020 as well. Similarly, avoiding a penalty is mentioned as the third reason that motivates businesses to get involved in corruption activities. And finally, this year and last year, having access to a special service is mentioned as the fourth factor that drives businesses towards corruptive behavior, as may be seen in the graph 2.8. below.

![Fig. 2.8. What drives businesses into being involved in corruption?](image)

Over 83% of businesses selected the weak rule of law as the number one factor contributing to corruption, followed by 61% of respondents who mention lack of political will to fight corruption. And again, similarly to 2020, low salaries and poverty is believed to be the third factor that contributes to corruption in the country. There is a change of places between political uncertainty and weak legal framework this year compared to the previous year.

![Fig. 2.9. Factors contributing to the presence of corruption according to businesses](image)
When it comes to corruption as an obstacle to Foreign Direct Investments (FDI), around 87% of respondents share this claim, while less than 10% of respondents believe that it has an impact on FDI, but it is not a harmful factor. It should be noted that none of respondents believe that corruption does not have any impact on FDI. Almost a similar perception was generated from the last year’s survey as well, as well as in the last four years in general.

![Graph showing responses to the question: Is corruption an obstacle to FDI?](image)

**Fig. 2.10. Is corruption an obstacle to FDI?**

![Graph showing responses to the question: Has corruption impacted the decisions of respondents to invest in Kosovo in the past?](image)

**Fig. 2.11. Has corruption impacted the decisions of respondents to invest in Kosovo in the past?**

As may be seen in the graph above, around 45% of respondents in Kosovo say that corruption has impacted their decisions to invest in Kosovo in the past compared to 53% of respondents who claimed this in last year’s study, which is significantly smaller compared to 2020. Higher is the percentage of those who say that corruption has not
impacted the decisions to invest in the country, with around 22% of respondents saying this compared to 13% in the previous year.

Similarly, to the previous years, businesses base their assessment on the level of corruption on the experience of their friends/partners, followed closely by their personal experience, and then by reports prepared by international organizations, media reports and reports of local organizations. It is an interesting fact, that local organizations enjoy smaller trust among the private sector enterprises in Kosovo. A detailed overview of this indicator may be seen in the upcoming graph.

![Fig. 2.12. Information on which businesses rely their assessment on the level of corruption?](image)

Government of Kosovo has moved for 6 places down this year in the ranking of institutions with the highest level of corruption compared to the previous year when it was ranked number 1. Procurement Review Body is “crowned” as a champion in this category followed by courts that held the second-place last year as well, and publicly-owned enterprises that have moved for three places up in terms of being perceived as the most corrupt institutions.

![Fig. 2.13. Perceived corruption by institutions according to businesses](image)
Included for the first time in this assessment, international organizations are also believed to be corrupted with around 15% of respondents claiming this. Arbitration, as an alternative dispute resolution mechanism is the institution with the lowest ranking in terms of corruption perception, with only 2.48% of respondents believing that there is corruption in this mechanism.

52% of respondents believe that the responsible institutions are not very effective in fighting of corruption, and almost one third of them believing that institutions are not effective at all at fighting corruption, and with 1.65% of respondents believing that institutions are very effective. The latter is again almost comparable to the 2020 study, whereby 2.07% of respondents claimed this.

Only 11.5% of respondents believe that institutions are effective in fighting corruption, which poses an incremental increase compared to last year when less than 2% of businesses believed that institutions were effective in fighting corruption.

![Bar Chart: Effectiveness of responsible institutions in fighting of corruption](image)

**Fig. 2.14.** Effectiveness of responsible institutions in fighting of corruption

![Bar Chart: Have businesses encountered corruption in the public sector?](image)

**Fig. 2.15.** Have businesses encountered corruption in the public sector?
Similar to past years, there is a gap between the percentage of businesses who have encountered corruption versus the higher percentage of those who see corruption as a problem in the country. Findings remain almost the same compared to 2020. Around 39% of businesses have encountered corruption compared to 40% in the previous year, which seems to be almost the same. Around 30% is the percentage of respondents who have not encountered corruption compared to 31% who declared this in 2020.

There seems to be a similarity in terms of ranking of institutions in which businesses have actually encountered corruption, The Procurement Review Body is ranked first by 32% of businesses who have reported to have actually encountered corruption, although the same percentage is shared with Tax Administration of Kosovo and Courts. Even in this category of actual corruption, government is ranked number five with around 23%.

It is encouraging to see that businesses have not encountered any corruption in arbitration, which is normally promoted as a very efficient mechanism of dispute resolution. This should necessarily promote the importance of this mechanism as a trusted body as well.

**Fig. 2.16. Institutions in which businesses have encountered corruption**

**Fig. 2.17. Is corruption present in public procurement activities according to businesses?**
Perception of corruption presence in public procurement activities still remains quite high with 42.98% believing that corruption is very much present in public procurement activities, however, compared to last year (52%), we have seen a decrease. In general, 90% of respondents believe that corruption is present to some extent in public procurement activities, with the remaining portion of respondents not knowing this, and similar to last year, zero respondents claiming that corruption is not present at all in the public tendering processes.

The graph 2.18. below shows the impact of electronic procurement, with around 46% of respondents believing that the electronic procurement will help in fighting corruption to some extent, with 28.10% of respondents believing that e-procurement will greatly help in fighting of corruption, and 14% claim that it will not have an impact on the fight against corruption, which has increased compared to last year’s Study.

The chart below shows the ranking of public institutions in terms of transparency in a scale of 1-5 with 5 being the highest level of transparency. It can be easily noted that international organizations and Tax Administration of Kosovo have received a higher percentage of those who have ranked the transparency rate in these institutions with the highest mark (5), whereas Procurement Review Body and the publicly-owned enterprises have the highest percentage of the lowest marks (1) in terms of transparency. A detailed ranking of each institution in terms of transparency if shown below in graph 2.19.
Fig. 2.19. Ranking of public institutions in terms of transparency from 1-5 with 5 being the highest level of transparency

Fig. 2.20. Do businesses trust the judiciary in Kosovo?

As presented in the graph 2.20. above, 60% of the respondents partially trust the functioning of the judicial system in Kosovo. This has increased when compared to last year (2020) where the number of respondents that partially trusted the judicial system was 47%. 29% of respondents have expressed their negative response towards trust in judiciary, comparing it to last year, there is a significant improvement, where the lack of trust in the function of the judicial system was 50%. 11% of respondents believe that the judicial system in Kosovo functions properly, which also marks a significant improvement from last year, where the respondents that believed in the functioning of the judicial system was only 3%.
The graph 2.21. above presents the improvement in the judiciary system in Kosovo with the announced vetting, where more than 50% of the respondents believe that vetting will improve the judiciary system. A number of around 32% of the respondents have given the answer that they do not know whether vetting will improve the judiciary system and a lower percentage than 15 have negatively responded to this.

In the graph 2.22. above, about 63% of respondents have claimed that they do not believe the enforcement mechanisms (police, prosecutor’s office, courts) are effective in the fight against corruption, whereby 17% have ranked it as not at all effective along with 46% who stated it was not very effective while about a third have rated enforcement mechanisms as effective, with 22% as effective, and 11% of as very effective.

In addition, when comparing the responses with the study of last year, we have found an enormous improvement in perception. In 2020 about 88% of respondents had stated that they find enforcement mechanisms either not at all (38%) or not effective (50%), and only
around 10% of them had rated enforcement mechanisms as effective (8%) or very effective (2%).

Fig. 2.23. Does Kosovo have a good legal framework to fight corruption?

45% of the respondents believe that Kosovo’s legal framework is partially good in fighting corruption, which is slightly higher compared to last year’s Study (41%).

A low number of 25.6% believe that Kosovo’s legal framework is good enough to fight corruption, which has not changed a lot compared to last year, which found 24% of businesses believing that the legal framework is good.
3. Corruption within the private sector

This study has found that around two thirds of respondents believe that there is corruption in business-to-business transactions/relationships in the private sector, and one third of businesses do not believe corruption exists in the private sector.

![Fig. 3.1. Perceived corruption in business-to-business transactions/relationships](image)

When it comes to perceived corruption by type of operations, 41.32% believe that corruption is present more in audit and accounting sector, which is interesting since this percentage has not changed compared to last year. A significant positive difference in comparison with last year was seen regarding legal services, dropping from around 50% in last year to 38% in this year.

![Fig. 3.2. Perceived corruption in private sector by type of operations](image)

When asked whether they have encountered any forms of corruption, only around to 25% of respondents have actually encountered with corruption, with the same percentage of respondents preferring not the answer to this question, and the highest percentage of
respondents, 50.41% claimed not to have encountered corruption in the private sector. There is a significant gap between the perceived corruption and encountered corruption, similarly to corruption perception in public sector, as shown in the upcoming graph 3.3.

![Fig. 3.3. Encountered corruption in the private sector](image)

4. Reporting corruption

Similar to previous years less than 90% of businesses have undertaken efforts to report corruption, with only 11.5% of respondents claiming to have actually reported corruption with the respective institutions. This continues to be a worrisome finding, knowing that businesses and citizens are an important link in the corruption-fighting chain. Nevertheless, the rule of law mechanisms should demonstrate clear results in fighting of corruption in order for businesses to increase their trust on these mechanisms. This may result in increased reporting in the coming years as well.

![Fig. 4.1. Have businesses reported corruption to the respective authorities?](image)
This year’s study finds that the percentage of those who have reported corruption in the Anti-Corruption Agency has increased drastically compared to last year. This year, 50% of respondents have reported to the Anti-Corruption Agency, while last year only 22%. It is highly encouraging to see an increased reporting to this agency, knowing its authority to initiate and conduct procedures for preliminary detection or investigation of corruption. It may be assumed that as a result of the new Government, which is devoted declaratively to fighting corruption, people have also gained more trust in institutions and reporting of corruption to the Anti-Corruption Agency, and also other institutions.

There is a significant difference between those who claim to report corruption, to those who have actually reported it. The difference is quite small compared to the 2020 Study, in which 50% have claimed to report all cases of corruption, whereas this year, we have seen an increase in this, with a 65% of respondents claiming that they will report all cases of corruption in the future. It should be noted that the percentage of those who commit to report corruption, only if it has a significant impact for their company, has decreased compared to last year from around 32.98% to 24.79%. Furthermore, the percentage of respondents who will definitely not report corruption has also decreased compared to last year from 4.52% to 1.65%.

**Fig. 4.2. Where have businesses reported corruption?**

**Fig. 4.3. Will businesses report corruption in the future?**
Fig. 4.4. Do businesses know that corruption can be reported anonymously in the Anti-Corruption Agency?

Regarding the reporting of corruption to the Anti-Corruption Agency, it is noted that around 65% of respondents are aware that they can report corruption anonymously in this Agency, which has marked an increase compared to last year’s study, where 58% of respondents were aware of this. Consequently, the number of respondents not being aware that they can report to this Agency (36%) has decreased this year compared to last year from 42%.

Fig. 4.5. Why do businesses hesitate to report corruption?

As presented in the graph 4.5. above, fear of retaliation against businesses by that institution in the future, remains the key factor behind businesses’ reluctance to report corruption with 85.12% of respondents claiming this, followed by lack of trust in judicial institutions as per 76.86% of respondents. Over 55% of respondents state dissatisfaction with the results of fighting corruption. This year’s study finds an increase in those being reluctant to reporting corruption due to unsatisfactory results in fighting of corruption from 53% to 57%.
5. Improving corporate governance to fight corruption

Fig. 5.1. Do businesses have information on corporate governance principles?

Businesses report a satisfying level of knowledge on corporate governance principles, as this year’s Study finds that approximately 87% of respondents have knowledge about these principles and only 13% of them who lack knowledge on corporate governance principles. As shown in the graph above, around 44% of respondents have knowledge on corporate governance principles and have started implementing them in their companies, which has marked a great increase compared to last year’s Study, which found 33% of respondents that have implemented these principles in their companies. However, the number of respondents that claim to have partial information about these principles has decreased from last year from 36% to 27%, followed by nearly 16% who have knowledge on these principles, but have not yet started to implement them in their companies.

The graph 5.2. below shows that 45% of respondents believe that business associations should undertake awareness raising activities on corporate governance, followed by around 35% of those who believe that financial institutions and/or donor organizations have a role to play in this regard, which has increased compared to last year’s Study, which found 27% of those who believed the same. And lastly, nearly 20% who claim that it is not their priority, at the moment, to undertake such awareness.
Fig. 5.2. Which of the following options do you think would raise awareness about corporate governance?

In the graph 5.3. below, we can see that approximately 65% of respondents have a code of ethics and implement it properly, which finds a slight increase compared to 2020 Study of 61%. Moreover, there is a difference in those businesses who have a code of ethics but have not yet started to implement it, which has decreased from last year’s Study from 8% to 6% this year. The percentage of those who have reported not to have a code of ethics is quite similar to that of last year from 11% to 12.4%, followed by 16.5% of businesses who have no code of ethics, but are planning to create one.

Fig. 5.3. Do businesses have a code of ethics?
6. Conclusions

- Businesses perceive that there has been a decrease in the corruption rate, from 58% in 2020 to 44% in 2021.
- Migration of labor force and corruption are the two main factors that Kosovo faces, followed by the undeveloped education system and inefficient court system. The rate of perception of corruption compared to the previous five years has increased in the view of around 12% of the respondents.
- The COVID-19 pandemic is estimated to not have any significant impact by 42.15% of the respondents.
- Bribery remains at the top of the list with approximately 62% of respondents ranking it, followed by the abuse of public money with 58% and nepotism and clientelism with 52%.
- The key factor contributing to corruption is the weak rule of law as per 83% of the respondents.
- The lack of political will to fight corruption has faced a significant decrease from last year, from 80% to 61%.
- Around 29% of respondents claimed a lack of trust on the judiciary.
- 18% of the respondents do not believe the enforcement mechanisms, i.e., the police, prosecution, and courts, in Kosovo, are effective in the fight against corruption.
- Over 88% of the respondents indicate that they have never reported corruption cases to the authorities.
- Procurement Review Body with 57%, followed by the Courts with 50%, as well as Publicly Owned Enterprises with 49% are perceived to be the most corrupted institutions according to the respondents.
- Approximately 25% of the answers given in the survey, indicate that during their career years, business have encountered corruption, which has decreased compared to last year (40%).
- Around 32% have ranked the Procurement Review Body, Tax Administration of Kosovo, and Courts as the three institutions in which corruption has been encountered, followed by Customs (26%), Government (23%) and Publicly-owned enterprises (21%).
- 67% of respondents believe that there is corruption in the private sector.
- Around 25% of respondents have actually encountered with corruption and 50.41% claimed not to have encountered any form of corruption in the private sector.
- Perceived corruption by business functions: over 41% of respondents believe that corruption is present more in audit and accounting, 39% believe that corruption occurs in sales, 38% believe that corruption is present in legal services, as well.
- In 2021 only 12% of respondents have claimed to have reported corruption.
- 65% of businesses committed to report all cases of corruption in the future. Marking a decrease from last year (75%).
- The percentage of respondents who will definitely not report corruption has decreased from 4.5% to 1.65%.