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Transparency International Bulgaria holds a special consultative status with the UN Economic and Social Council since 2023

# TRANSPARENCY INTERNATIONAL BULGARIA

# STRATEGY 2027–2030

** Adopted: August 2026*

The purpose of this strategy is to outline the main directions, priorities and approaches in the work of Transparency International Bulgaria for the period 2027–2030. The strategy has been developed in accordance with the mission, vision and goals of TI-Bulgaria, taking into account the socio-political context in the country, the established progress and deficits in the field of the rule of law, good governance and the prevention and counteraction of corruption. The strategy is based on European and international standards and good practices, the national strategic and legislative framework and seeks to contribute to achieving the goals and results set out in the *Holding Power to Account – A Global Strategy Against Corruption 2021–2030"* of Transparency International movement.[1]

The implementation of the strategy will be a joint effort of the association members, the board of directors and the team of Transparency International Bulgaria with the invaluable support of our like-minded people, volunteers, partners and donors. An important component for the successful implementation of the goals set in the strategy is the securing of funding for specific initiatives and areas of activity.

The document was prepared in accordance with the organisation's commitments as the member of the global anti-corruption movement Transparency International, the international network for the protection of whistleblowers Whistleblowing International Network (WIN)[2] and the organisation's special consultative status with the Economic and Social Council of the United Nations (ECOSOC)[3][4]

## ABOUT TRANSPARENCY INTERNATIONAL BULGARIA

Transparency International Bulgaria was established in June 1998 as the Bulgarian national chapter of the global anti-corruption movement Transparency International. Our founders are prominent figures from all areas of public life. Since its establishment in 1998, our organisation has gained significant capacity to develop and implement projects to combat corruption, to promote standards of good governance in public and private sectors and has managed to build its reputation as a professionally working, politically impartial and active civil organisation. Transparency International Bulgaria has created a broad circle of supporters and relies on a multitude of independent scholars and experts from various fields of science and public life, who participate in the implementation of the organisation's projects and initiatives. The established contacts with national and international

[1] Available at: https://files.transparencycdn.org/images/Strategy2030_Brochure-final_15022021.pdf
[2] https://whistleblowingnetwork.org/Home
[3] https :// ecosoc . un . org / en
[4] https://ecosoc.un.org/en

institutions were expanded with joint initiatives and cooperation with civil society structures and the media, and TI-Bulgaria has gained a reputation as a respected and stable organisation.

**The mission** of Transparency International Bulgaria is to unite the efforts of state institutions, local authorities, business, civil society, the academia and the media in order to implement systemic reforms and take action against the spread of corruption at the national, regional and international levels.

In our work, we defend the principles of the rule of law, human rights, freedom of expression, and active civic participation as fundamental guarantees for sustainable democratic governance.

**Our vision** is for a society in which the principles of good governance are not declared but applied daily – from state institutions to corporations, from local government to civic initiatives. We strive for a country in which institutions act legitimately, responsibly and transparently, business operate in a predictable and fair environment, and citizens have a real opportunity to participate in decision-making and seek accountability from those in power.

Transparency International Bulgaria has been an associate member of the Whistleblowing International Network since 2020, and since 2023 has been accredited for special consultative status with ECOSOC (Economic and Social Council of the United Nations).

## CONTEXT OF OUR WORK

### Situational Analysis

Corruption and non-transparent governance have dominated the public discourse in Bulgaria for years as one of the most serious obstacles in the country's development. Numerous studies, analyses and reports show a low level of trust in institutions, a low level of media freedom, weak progress and lack of consistency in the policies and reforms being implemented, a high level of bureaucracy and difficulties for business, non-transparent appointments to public positions, a low level of trust in the tools for reporting corrupt practices and misconduct that threaten the public interest and block democratic processes.

Over the past 5 years (2021–2026), the political and social environment in Bulgaria has been characterized by unprecedented political instability and the longest series of early elections in the country's modern history. Between 2021 and 2026, Bulgaria went through eight parliamentary elections. The chronology of events shows a deep fragmentation and decline of the traditional party model. After the mass protests in 2020, the country entered a spiral of early votes, alternating with a series of caretaker cabinets, unstable coalitions and new elections. The regular coalition governments formed during this period failed to lead to stable governance.

The political fragmentation directly affected public attitudes, reflecting a deepening erosion of trust in the political class and institutions. The policies pursued by those in power were mainly aimed at “fighting fires” – dealing with already arisen challenges, “saving” European funding and renegotiating

commitments made by the state, instead of implementing real reforms. An additional challenge is the war in Ukraine, which has led to deep opposition and division in both the political class and society regarding Bulgaria's geopolitical orientation and its membership in NATO and the European Union.

In late 2025, public discontent culminated in mass anti-corruption protests, with particularly strong participation by young people (the so-called Gen-Z). In the early elections in April 2026, one of the parties won an outright majority. However, the quality of governance has yet to be assessed.

Despite the aforementioned challenges, the country managed to fulfil two major long-standing foreign policy priorities by becoming a full member of the Schengen Area and the Eurozone.

## Corruption Perceptions Index and Eurobarometer

The analysis of the results of the Corruption Perceptions Index in Bulgaria for the period 2012–2025 shows a chronic lack of significant progress in combating corruption. Against the background of positive developments in some EU member states (such as Estonia, Lithuania, Latvia, Czechia), the country's index highlights a trend of serious lagging behind.

Bulgaria never managed to get close to the critical limit of 50 points (out of 100 possible), which would indicate real development in a positive direction. Despite a slight increase in the indicator to 45 points in 2023, in the following years the trend turned downward again, and in 2025 – with 40 points – the country recorded the lowest result on the CPI since 2012.

In the last two years alone, the score has deteriorated by 5 points – a statistically significant change that once again demonstrates the effects of the lack of decisive action against kleptocratic circles, the long-standing facade efforts to counter corruption, and the growing attacks on civil society.

Corruption, patronage and nepotism continue to be a serious risk to business – 48% of companies identify corruption as a significant problem, 53% cite nepotism as an obstacle to business development, and 87% perceive corruption as widespread in our country[5][6] This creates an environment in which competition is distorted, investments are being postponed, and the shadow economy and money laundering remain a serious challenge.

The lack of progress on key reforms, unfulfilled international recommendations, and ineffective implementation of anti-corruption legislation place the country at a disadvantage both in the EU and in the OECD accession process, which is marked by formalism.

[5] Businesses' attitudes towards corruption and businesses' perception of the independence of national justice systems in the EU and in selected enlargement countries in 2026, available at : https://europa.eu/eurobarometer/surveys/detail/3694 ( at English language )

[6] Businesses' attitudes towards corruption and businesses' perception of the independence of national justice systems in the EU and in selected enlargement countries in 2026, available at : https://europa.eu/eurobarometer/surveys/detail/3694 ( at English language )

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## Rule of Law State of Play

The 2026 Rule of Law Report Country Chapter on the rule of law situation in Bulgaria outlines the main commitments made by the country regarding the rule of law, progress in some areas, as well as challenges and problems, and provides specific recommendations.

Some of the most significant challenges, issues, and recommendations outlined by the European Commission regarding the prevention and fight against corruption include:

- Lack of progress on ensuring a robust track record of investigations, prosecutions and final judgments in high-level corruption cases.
- Little progress in ensuring the full operationalisation and effective performance of the Anti-Corruption Commission.
- Limited progress in improving integrity among top executive functions. Bulgaria is recommended to continue efforts to strengthen the integrity of top executive functions, taking into account European standards, in particular by ensuring that clear integrity standards for the Government as well as an appropriate sanctioning mechanism are in place.
- Lack of progress in improving the quality of the legislative process, as the practical implementation of parliamentary rules for law-making continues to raise concerns. Bulgaria is recommended to strengthen the quality of the legislative process by ensuring the use of public consultations and impact assessments for legislative initiatives by the National Assembly.[7]

## European and International Standards

The priorities and approaches of Transparency International Bulgaria are based on and informed by the European and international standards in human rights, the rule of law, combating corruption and good governance.

**European Union:**

- EU Charter of Fundamental Rights;
- Council Decision 2008/852/JHA of 24 October 2008 on a contact-point network against corruption;
- Directive (EU) 2026/1021 of the European Parliament and of the Council of 29 April 2026 on combatting corruption, replacing Council Framework Decision 2003/568/JHA and the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union and amending Directive (EU) 2017/1371 of the European Parliament and of the Council;

[7] https://commission.europa.eu/document/download/417a722f-93b6-4682-a52b-f08b80747e31_en?filename=Country%20chapter%20-%20Bulgaria%20-%20EN%20.pdf

- Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law;
- Directive (EU) 2014/42 of the European Parliament and of the Council of 3 April 2014 on the freezing and confiscation of instrumentalities and proceeds of crime in the European Union;
- Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC;
- Directive 2014/25/EU of the European Parliament and of the Council of 26 February 2014 on procurement by entities operating in the water, energy, transport and postal services sectors and repealing Directive 2004/17/EC;
- Directive 2014/23/EU of the European Parliament and of the Council of 26 February 2014 on the award of concession contracts;
- European Commission's Rule of Law Reports.

**Council of Europe:**

- Criminal Law Convention on Corruption, ETS No. 173;
- Civil Law Convention on Corruption, ETS No. 174;
- Additional Protocol to the Criminal Law Convention on Corruption, ETS No. 191;
- Resolution 97(24) of the Committee of Ministers of the Council of Europe on the Twenty Guiding Principles for the Fight Against Corruption;
- Recommendation Rec (2003)4 of the Committee of Ministers to member states on common rules against corruption in the financing of political parties and electoral campaigns.

**United Nations:**

- The United Nations Convention Against Corruption (UNCAC), ratifies by the National Assembly of Bulgaria on 15 August 2006 (prom. in State Gazette, No. 66/2006);
- The International Code of Conduct for Public Officials was adopted by the United Nations General Assembly in Resolution 51/59 on 12 December 1996;
- International Covenant on Civil and Political Rights (ICCPR), adopted on 16 December 1966 by the United Nations General Assembly via Resolution 2200A (XXI); ratified by Bulgaria on 21 September 1970, following its initial signature on 8 October 1968 (prom. in State Gazette, No. 43/1976);

- International Covenant on Economic, Social and Cultural Rights (ICESCR), adopted on 16 December 1966 by the United Nations General Assembly via Resolution 2200A (XXI); ratified by Bulgaria on 23 July 1970 (prom. in State Gazette No. 43/1976).

**Organisation for Economic Cooperation and Development:**

- Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- Guidelines for Multinational Enterprises on Responsible Business Conduct;
- Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises.

## National Strategic Framework

As of mid-2026, 162 strategic documents are in force in Bulgaria[8] – strategies, programs, plans, etc. The main strategic documents which inform the activities of TI-Bulgaria include:

- National Development Program "Bulgaria 2030";
- National Recovery and Resilience Plan;
- National Strategy for Prevention and Counteraction to Corruption for the 2021–2027 period and its Roadmap;
- National Roadmap for Cooperation between the Republic of Bulgaria and the Organisation for Economic Co-operation and Development (OECD) for the 2023–2025 period;
- Updated National Strategy for Small and Medium-sized Enterprises for the 2021–2027 period with an extended validity period until 2030;
- Strategy for the Development of Internal Scrutiny in the Public Sector of the Republic of Bulgaria for the 2023–2026 period;
- Updated Strategy for Continuing the Reform of the Judicial System;
- National Strategy for the Prevention and Combating of Irregularities and Fraud Affecting the Financial Interests of the European Union for the 2021–2027 period;
- Strategy for Anti-Money Laundering and Countering the Financing of Terrorism in the Republic of Bulgaria for the 2023–2027 period;
- Action Plan to Limit the Risks of Money Laundering and Financing of Terrorism;

[8] Public Consultation Portal https://strategy.bg/StrategicDocuments/List.aspx?categoryId=1&typeConsultation=1( strategy.bg )https://strategy.bg/StrategicDocuments/List.aspx?categoryId=1&typeConsultation=1

- Updated National Strategic Document *Digital Transformation of Bulgaria for the 2024–2030 period*;
- Governance Program of the Republic of Bulgaria for the 2026–2030 period, adopted by the Council of Ministers Decision No. 612 of 12.08.2026.

### Holding Power to Account – A Global Strategy Against Corruption 2021–2030 of Transparency International Movement

The priorities in the activities of Transparency International Bulgaria, outlined for the period 2027-2030, are based on the spirit, principles and goals of the Global Strategy of the movement and will contribute to achieving the following goals and results of the Global Strategy:

#### Objective 1. Protect the public's resources

**Outcome 1.1.** Maximum openness, transparency and responsiveness in public contracting

#### Objective 3. Secure integrity in politics

**Outcome 3.1.** Removal of undue influence from elections and political appointments

**Outcome 3.2.** Greater transparency, accountability and equity in influence over public decision-making

#### Objective 4. Drive integrity in business

**Outcome 4.1.** A critical mass of business leadership fulfilling strong integrity commitments

**Outcome 4.2.** More effective exposure and punishment of corrupt business

#### Objective 5. Pursue enforcement and justice

**Outcome 5.1.** Strengthened independence, capacity and will to act for integrity institutions

**Outcome 5.3.** An effective international anti-corruption enforcement framework

#### Objective 6. Expand civic space for accountability

**Outcome 6.1.** Enhanced freedom and security for activists, whistleblowers and journalists to challenge abuse of power

**Outcome 6.2.** Increased channels for people to demand results for the common good

#### Objective 7. Build community leadership against corruption

**Outcome 7.1.** Strengthened public discourse based on deeper understanding and acceptance of accountability values

**Outcome 7.2.** A next generation of civic, public and business leaders better equipped to fight corruption

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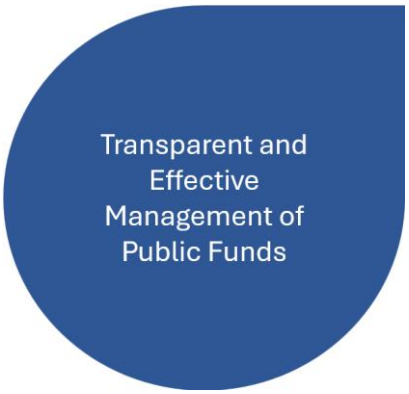
## PRIORITIES

The situational analysis, the current strategic and legal framework, the European and international standards, and the affiliation of Transparency International Bulgaria to the global movement Transparency International outline five priority areas for our work in the 2027–2030 period.




**Our goal:** Introduction and systematic implementation of specific anti-corruption policies, standards and instruments, with a view to reducing the risk of unregulated forms of influence on decision-making harming the public interest; strengthen the integrity, transparency and accountability of all actors in public life; improvement of the regulatory and institutional framework for lobbying and other forms of direct citizen participation in decision-making and governance; promotion of regulatory systems that address corruption risks at all levels and prevent the concentration of power.

**Our goal:** Reduce the risk of harming the public interest due to mismanagement of national and European funds and budgets by establishing standards for publicity and transparency in the award of public procurement contracts in order to minimize the opportunities for corruption and misuse of taxpayers' money; promoting the development of free and fair market competition, increasing public trust in decision-making on public funds' spending and providing opportunities for close scrutiny by experts and civil society of the implementation of public procurement contracts.







**Our goal:** Adoption by business – both in the private sector and in public enterprises, of ethical rules, structures and policies that are based on full compliance with the economic activity regulations, additional self-regulation – principles of business ethics, codes of ethics and anti-corruption policies (voluntary for the private sector and in fulfilment of legal obligations for public enterprises), which determine the rules of conduct of companies and their interaction with the external environment, including business partners/ suppliers/ subcontractors, clients, public institutions, business associations, lobbyists, media, as well as the introduction of the principles of good governance and mechanisms and specific tools for corruption risks management.

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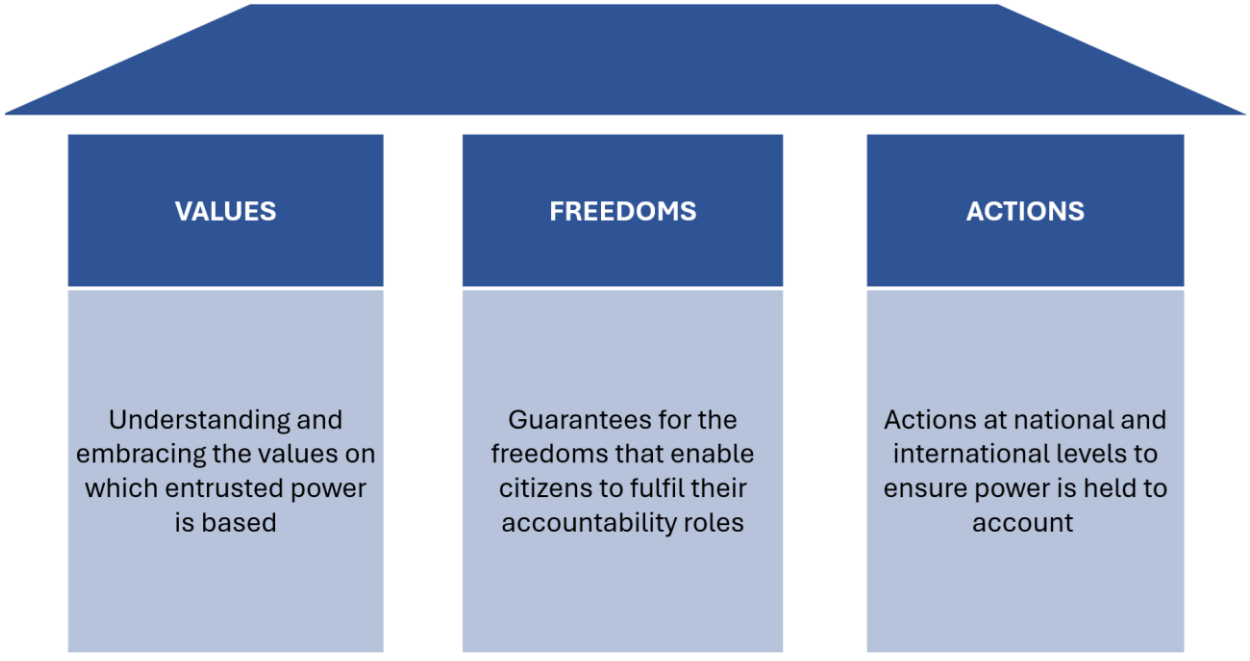
**Our goal:** Guarantying of secure and safe mechanisms for reporting wrongdoing; ensuring effective protection for whistleblowers; promoting whistleblowing as an organisational culture and a key tool for exposing corruption, fraud, mismanagement and other malpractice that can threaten public security, public health, financial integrity, the environment and the rule of law.

Timely and Effective Protection for Whistleblowers

Countering Political Corruption

**Our goal:** Shedding light on the financing of political parties and electoral campaigns with an eye toward increasing of the public awareness about the undue influence of economic entities, foreign structures and disinformation networks on political positions and decision-making; regulation of the fair use of public resources for political purposes and preventing conflicts of interest among persons holding public office.

The outlined priorities are an integral part of our global vision for a long-term change, which requires a holistic approach with the participation of citizens and civil society and the active involvement of governments, public administrations, businesses, the media and academia. In line with the strategy of the Transparency International movement, this change is based on three fundamental pillars:



## OPPORTUNITIES

- Entry into force of the EU Anti-Corruption Directive (Directive (EU) 2026/1021). The European Anti-Corruption Directive introduces common standards, binding on Member States, in the field of preventing and combating corruption. The upcoming transposition of the Directive into national legislation is a favourable opportunity to improve existing and introduce new, more effective anti-corruption mechanisms and instruments.

- The principle of "Money for reforms" adopted in the planning of the Multiannual Financial Framework 2028-2034. This principle has proven its effectiveness under the Recovery and Resilience Facility (NextGenerationEU) in a number of Member States. The upcoming negotiation of national programmes provides an opportunity for advocacy in linking the national programme to specific reform commitments and instruments in prevention of corruption and good governance.

- Revision of the Public Procurement Directives. The revision of the public procurement regulatory framework and the subsequent transposition at national level, announced by the European Commission, will provide an opportunity to reduce the administrative burden for both contracting authorities and bidders to and suppliers of public contracts. Combined with appropriate incentives for fair businesses, this will lead to enhanced market competition and more transparent spending of public funds in the public interest.

- Bulgaria's ambition for full membership in the Organisation for Economic Cooperation and Development (OECD). Negotiations for the country's accession to the reputable international organisation are at an advanced stage, with the main focuses for policy coordination being reforms to tackle corruption and manage corruption risk, strengthening market competition and introducing international standards in a number of areas (investments, innovations, management of public enterprises, etc.).

- The upcoming preparation of a National Anti-Corruption Strategy with a horizon beyond 2027. The preparation of a new strategic document of national importance, on the one hand, is necessary due to the expiration of the current strategy, and on the other hand – due to the explicit obligation imposed on the Member States by Directive 2026/1021. An analytical review of the current strategy, an assessment of the level of implementation, and the introduction of mechanisms for a more effective enforcement of the policies in future periods are also necessary.

## THE MAIN APPROACHES TO IMPLEMENTING THE STRATEGY

**Data generation and analysis:** conducting research initiatives on the issues of corruption, good governance, the rule of law, etc., including by mobilizing the efforts of experts, authorities and academia. Using and analysing big data, available in open format, with the help of modern technical tools (such as LLM, AI) and presenting the results in accessible formats and plain language.

**Pilot implementation of tools:** development or adaptation, testing, approbation and evaluation of various instruments for civil monitoring aimed at preventing and reducing the risk of corruption; study

and adaptation of internationally recognized tools in the field of good governance, anti-corruption policies, fair and ethical business, financing of political activity, etc.

**Partnership and cooperation:** establishing practices for lasting interaction and cooperation with central and local authorities, business associations, experts, media, academia, civil society organisations, EU bodies, Council of Europe, OECD, UN, including but not limited to providing opinions, expertise, participation in working groups and advisory councils, joint projects and initiatives.

Synergy with Transparency International movement chapters and structures to achieve goals at local, European and global levels in line with the Global Strategy 2021-2030; efforts to strengthen bilateral work with the organisation's representation to the European Union; sharing of experience within the Transparency International network, as well as with other partner organisations at national and regional level; participation in international fora, events and discussions organised by and/or held under the auspices of Transparency International, such as the International Anti-Corruption Conference (IACC), regional meetings, bootcamps, etc.; advocacy and actions to improve the operating environment for civil society in the country – interaction with partner organisations from the sector as members of "United", of the Public Council to the Commission for the Direct Participation of Citizens and Interaction with Civil Society in the 52nd National Assembly, and participation in joint initiatives.

**Information and communication:** further development of existing and creating new channels and methods of communication with the general public, with a particular focus on the youth audience; creating and distributing information and communication materials to increase the knowledge of authorities, businesses and media, as well as the general public on topics related to the prevention and counteraction of corruption, the rule of law, good governance, the protection of whistleblowers.

**Advocacy and expertise:** advocacy and expert support to national and local authorities, business and the media regarding the introduction of European and international standards and good practices in the field of prevention and counteraction to corruption, the rule of law and good governance, integrity in business, protection of whistleblowers, etc.

**Analysis, evaluation, improvement and sustainability** of the initiatives implemented by Transparency International Bulgaria; assessment of the results and reasons that had favourable or negative impact on the achievement of the goals, as well as adaptation of the organisation's approach and methods in future interventions; increasing the skills and expertise of TI-Bulgaria team members through participation in trainings, seminars, workshops and other forms of enhancing professional competencies.

## ORGANISATIONAL SUSTAINABILITY AND PREREQUISITES FOR IMPACT

Transparency International Bulgaria enters the 2027–2030 strategic period with established expertise, civic monitoring tools, and partnerships with institutions, universities, business, and non-governmental organisations. Funding of specific initiatives allows for the development of specialized instruments, but often does not provide continuity for long-term monitoring, sustainable advocacy, or

immediate response to emerging issues. TI-Bulgaria plans to develop its organisational sustainability in four interrelated areas: diversification and planning of funding; development and retention of expertise; systematic documentation and sharing of knowledge; and measurement of changes in policies, institutional practices, and citizen participation to which it contributes. Process management will be based on a periodic assessment of organisational needs, financial status, and achieved results.

## OUR ACHIEVEMENTS SO FAR

Since the foundation of TI-Bulgaria, we have achieved a lot. Due to its activities, initiatives and expertise, Transparency International Bulgaria has a reputation of reputable and respected organisation and is a frequently sought-after partner in implementing policies, initiatives, trainings and tools aimed at increasing transparency, integrity and accountability in both the public and private sectors, in Bulgaria – at the national and local levels, and internationally.

Among the most significant achievements of TI-Bulgaria are the introduction, implementation and subsequent development of tools such as the Integrity Pact (creation of a Bulgarian model and application of the tool in several large public procurement procedures of strategic importance at the national level) and its subsequent recognition at the EU level, tools for civic observation of elections, electoral campaigns and public tenders, business integrity standards, a mechanism for protection of whistleblowers and a Model of rules for internal reporting and follow-up, the Local Integrity System Index, the Political Party and Campaign Financing Index, the Municipalities Investment Climate Map, numerous legislative proposals based on international good practices and recommendations of Transparency International movement, the European Commission, the OECD and the UN.

For more than 20 years, Transparency International Bulgaria has been conducting independent citizen observation of all national and European elections in Bulgaria, and over the years has worked with thousands of civic observers and a wide network of partner organisations across the country.

### A multi-year snapshot

From January 2023 to June 2026, the Transparency International Bulgaria team has achieved:

- Sixteen implemented project initiatives, seven of which at national level, involving local authorities, the private sector, business associations and local civil society organisations, and nine international projects with partners from the civil, private and public sectors operating in EU Member States and candidate countries.
- Over 50 expert positions and opinions on current topics, draft laws, and public consultations at the national and European level.
- Over 40 public events, forums, round tables, trainings and seminars on topics related to good governance, integrity and ethics in administration and business, protection of whistleblowers, and civic monitoring of public procurement contracts.

- Over 700 participants in the organisation's events and trainings, including representatives of public institutions, businesses, civil society organisations and civic activists.

- Establishment of a number of strategic partnerships with public institutions in Bulgaria aimed at building capacity, exchanging expertise and developing mechanisms for transparency, accountability and integrity.

- Close cooperation with the UN Global Compact Network Bulgaria both within the framework of the "Business Integrity and Sustainability" forum and through the development of a training program and delivery of trainings on corruption risk management to representatives of the private sector.

- Participation in the establishment and development of the "United" platform, uniting civil society organisations in defence of democratic values, freedom of association, and active civic participation.

- Strengthening partnerships with Sofia University "St. Kliment Ohridski", Plovdiv University "Paisii Hilendarski", the University of National and World Economy, the Academy to the Ministry of Interior, through support for the improvement of curricula and active participation in the training of students on topics related to the prevention and counteraction of corruption, good governance, whistleblowing, monitoring the public funds spending, transparency of lobbying activities, etc.

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## THEORY OF CHANGE

### How the priorities and approaches of TI-Bulgaria correspond to the goals and results of Transparency International Movement

