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| The step under review | All vacancies on the Agency for Management of Confiscated Property have been filled |
| Baseline | Baseline (2024) is 0. |
| Deadline of the step | June 2025(grace period till June 2026) |
| Actual results | <p>In accordance with the obligations of the Growth Plan, the Agency for Management of Confiscated Property (hereinafter referred to as the Agency) has taken several specific and subsequent measures in order to ensure human, technical and spatial capacities for the full and efficient realization of its competencies.</p> <p>In the systematization act of the Agency a total of 79 positions are foreseen, of which 39 positions are fulfilled.</p> <p>On August 27, 2024, the Agency submitted a request to the Ministry of Finance for approval of the Annual Employment Plan for 2025, for a total of 40 jobs, of which: 32 administrative servants and 8 support and technical staff (guards). On September 3, 2024, a negative response was received from the Ministry of Finance, as well as instructions to revise the Annual Employment Plan for 2025 to avoid creating fiscal implications to the Budget of the Republic of North Macedonia (ANNEX 1). Also, it was emphasized that all annual employment plans for 2025 should be prepared and submitted in accordance with the policy for restrictive control over new employment.</p> <p>Subsequently, on October 11, 2024, the Agency again submitted a request to the Ministry of Finance for approval of the revised Annual Employment Plan for 2025 for a total of 6 new jobs and 1 promotion. On October 14, 2024, the Ministry of Finance issued second negative response to the Agency, reiterating the same explanation and recommendations provided in response to the initial request (ANNEX 2).</p> <p>On December 24, 2024, the Agency submitted a new request to the Ministry of Finance seeking financial approval for additional 5 (five) temporary employments for period of one (1) year, due to increased workload, i.e. during the period until 31.12.2025. By letter no. 19-13302/2 of 31.12.2024, the Ministry of Finance issued a negative response to the request, stating that the necessary financial resources were not provided (ANNEX 3).</p> <p>In January 2025, one (1) administrative servant (junior associate) was permanently transferred to the Agency from the Ministry of Inter-Community Relations, in accordance with the K5 Program.</p> <p>On January 10, 2025, the Agency submitted a new request to the Ministry of Finance seeking financial approval for 4 (four) additional temporary employments for period of one (1) year, due to increased workload. On</p> |

February 11, 2025, the Ministry of Finance issued a negative response, stating that the necessary financial resources were not provided (ANNEX 4).

On April 14, 2025, the Agency submitted a request (arch. no. 05-1829/1 of 14.04.2025) to the Ministry of Finance for approval to engage 3 persons with a contract for work due to providing professional assistance in the field of financial operations, public procurement and legal - operational matters, for a period of 7 months, i.e. until the end of the fiscal year 2025. On May 9, 2025, the Ministry of Finance submitted a response to the Agency with a notification (arch. no. 1829/4 of 09.06.2025 (filing no. 19-5554/2 of 04.6.2025) that no financial resources have been provided (ANNEX 5).

On April 14, 2025, the Agency submitted a new request to the Ministry of Finance (arch. no. 04-1828/2 of 14.04.2025) for the approval of the Annual Employment Plan for 2025 (arch. no. 04-1828/1 of 14.04.2025), for a total of five (5) positions as highest priority and urgency. The Ministry of Finance has given its consent to the Annual Plan (arch. no. 04-1828/3 of 27.05.2025) and at the same time issued financial approval (arch. no. 04-1828/9 of 19.06.2025) for employment of two (2) heads of departments, two (2) professionals and one (1) employment at the technical level. Announcements for the approved positions have been published.

On July 18, 2025, under public announcement no. 701/2025, the Agency, through the Agency for Administration, published an announcement for 3 administrative servants for the following positions:

- 2 Head of Department and 1 Junior associate

With an announcement no. 01/2025, the Agency published an announcement for the employment of 1 support and technical staff - driver.

A public announcement for employment of 1 administrative servant - Senior Associate Archivist - is ongoing.

The recruitment procedures are ongoing. They are expected to be finalized by the end of July 2025. The total number of positions to be filled is:

- 4 administrative servants (2 Heads of Department, 1 Junior Associate, and 1 Senior Associate Archivist)
- 1 support and technical staff (driver)

On May 29, 2025, the Agency submitted a new request to the Ministry of Finance for financial approval for employment of 13 (thirteen) temporary employees for the period until December 31, 2025, due to increased workload (arch. no. 05-2446/1 of 29.05.2025) (ANNEX 6). As of now, a response from the Ministry of Finance has not been received.

A request was also submitted to the State Attorney's Office for transfer of one (1) administrative servant, senior associate - archivist, but the request was rejected.

In May 2025, a functional analysis of the systematized positions (ANNEX 7) was conducted in accordance with the Law on Public Sector Employees and

was finalized on May 30, 2025. The analysis includes proposed recommendations for taking future steps.

Given the importance of these activities for fulfilling obligations, the Agency prepared Information to the Managerial Board detailing all activities undertaken, identified risks and needs, and proposing the initiation of further measures. After reviewing the content, the Managerial Board of the Agency, through the Agency, submitted Information to the Government with Draft Conclusions (ANNEX 8). Following the review of the Information, a conclusion has been adopted for all relevant institutions to hold a meeting to ensure the effective and continued implementation of the step.

On 6 June 2025, the Agency submitted a request (No. 05-2446/1 of 29 May 2025) to the Ministry of Finance seeking approval for the recruitment of 13 temporary positions. The Ministry of Finance issued a positive opinion on this request under No. 19-6268/2 of 6 June 2025 (ANNEX 9).

The recruitment activities were suspended due to the local elections. Following the completion of the electoral process, the Agency immediately resumed the procedure for fulfilling the vacant positions and undertook the following concrete actions:

After the end of the electoral process, the ongoing recruitment procedures (under the announcements from July 2025) for four positions continued, resulting in two successful recruitments:

- Head of Department for Enforcement of Court Decisions, and
- Senior Associate – Archivist.

At the same time, through the Agency for Administration, Announcement No. 1070/2025 was published on 27 November 2025 (second publication) for the two previously unsuccessful recruitment procedures for the following positions:

- Head of Department for Accounting and Payments, and
- Junior Associate for IT Support.

On 24 December 2025, the Agency adopted:

- a Decision on the Selection of a Candidate for the position of Head of Department for Accounting and Payments; (ANNEX 10) and
- a Decision on Non-Selection for one position, due to the lack of candidates fulfilling the prescribed requirements. (ANNEX 11)

On 25 December 2025, a request was submitted to the Agency for Administration to republish the announcement for the position of Junior Associate for IT Support. (ANNEX 12)

Additionally, Public Announcement No. 02/2025, Archive No. 04-2446/7 of 02 December 2025, was published for the recruitment of 13 temporary employment contracts, of which 11 recruitments were successfully completed by the end of the 2025 fiscal year. (ANNEX 13)

Considering that the financial approval was valid for 2025 and that part of the recruitment procedures will continue in 2026, the Agency, by Letter No. 04-

1828/30 of 25 December 2025, submitted a request to the Ministry of Finance for the extension of the financial approval for 2026. (ANNEX 14)

An Annual Recruitment Plan for 2026 for 18 permanent positions was prepared and submitted to the Ministry of Finance under Archive No. 04-3410/13 of 26 December 2025, with an accompanying letter No. 04-3410/14 of 26 December 2025. (ANNEX 15)

To assess the actual needs in staffing, based on the best practices, as well as having in consideration the Agency's workload enhanced by the amendments to the Law on the Management of Confiscated Property, Property Benefits, and Seized Objects from Criminal and Misdemeanor Proceedings from March 2024, internal workload analysis of the job systematization is prepared. In accordance with this analysis the total number of systematized positions is being rationalized from 79 to 65, i.e. 61 positions. This adjustment results from the identification of unsuitable, duplicated or general-purpose positions that do not directly contribute to the core mission of the Agency. The focus is placed on the quality, expertise and competence of staff, rather than on the quantity of positions.

The internal analysis was presented on a meeting with the EU Delegation, the Ministry of European Affairs and the Government, assessing that for the full and efficient functioning of the Agency, 24 new positions are required instead of the previously planned 40.

For this purpose, with support of an external expert an annex to the existing functional analysis was prepared.(ANNEX 16), The revised and streamlined functional analysis confirms that:

- The Agency requires a smaller, yet highly competent staff,
- The rationalization of positions is justified, legal, and necessary,
- The proposed reorganization ensures: efficiency, functionality and alignment with EU standards and reform obligations.

Following this, a new Rulebook on Systematization will be prepared, by the end of February 2026.

The strengthening of the Agency for the Management of Confiscated Property is foreseen under Special Objective 3.1 of the Action Plan accompanying the Strategy for Strengthening the Capacities for Conducting Financial Investigations and Confiscation of Property. The measures planned under this objective include enhancing the Agency's institutional capacities, human resources, and material infrastructure in line with the Law on the Management of Confiscated Property, Proceeds, and Seized Objects in Criminal and Misdemeanour Procedures, adopted on 13 March 2024 and aligned with Directive 2014/42/EU. The expected outcome is improved efficiency in the management of seized and confiscated property, including physical takeover, assessment, storage, value preservation, and increased revenue from sales and disposals, ensuring the effective and socially beneficial implementation of the law.

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| | <p>The Ministry of Finance issued a positive opinion of the Annual Recruitment Plan for 2026 for 18 permanent positions no. 08-32/349-1/of 12 January 2026. (ANNEX 17)</p> <p>Approval has been obtained from the Ministry of Finance for the allocation of financial resources in the Agency's 2026 Budget for the employment of 18 persons and one promotion. (ANNEX 18).</p> |
| <p>Evidence provided</p> | <p><i>ANNEX 1 _Request to the MF for The Annual Employment Plan for 2025</i> <i>ANNEX 2 _Request to the MF for The Annual Employment Plan for 2025</i> <i>ANNEX 3 _Request to the MF for 3 temporary employments</i> <i>ANNEX 4 _Request to the MF for 4 temporary employments</i> <i>ANNEX 5 _Request to the MF for 3 temporary employments</i> <i>ANNEX 6 _Request to the MF for 13 temporary employments</i> <i>ANNEX 7 _Functional analyses MK version</i> <i>ANNEX 8 _Information to the Government</i> <i>ANNEX 9 _Positive Opinion of the MF No. 19-6268/2, of 06.06.2025 – approval for recruitment of 13 temporary employment contracts MK</i> <i>ANNEX 10 _Decision on Selection of Candidate MK</i> <i>ANNEX 11 _Decision on Non-Selection of Candidate MK</i> <i>ANNEX 12 _Request to the Agency for Administration for re-announcement of vacancy, of 25.12.2025 Archive no. 04-5860/1 – for one position: Junior Associate for IT Support</i> <i>ANNEX 13 _Public Announcement No. 02/2025 MK</i> <i>ANNEX 14 _Part 1 _Request to the Ministry of Finance for the extension of the financial approval for 2026</i> <i>ANNEX 14 _Part 2 _Request to the Ministry of Finance for the extension of the financial approval for 2026</i> <i>ANNEX 15 _Part 1 _Cover letter Archive No. 04-341014, of 26.12.2025 _Annual Recruitment Plan for 2026 (18 positions)</i> <i>ANNEX 15 _Part 2 _Annual Recruitment Plan for 2026 (18 positions) - Submitted to the Ministry of Finance</i> <i>ANNEX 16 _Annex to the Functional Analysis 04-3/3 of 13.01.2026 MK version</i> <i>ANNEX 17 _Positive opinion of the MF no. 08-32/349-1/of 12.01.2026 for the annual Recruitment Plan for 2026 for 18 permanent positions</i> <i>ANNEX 18 _Part 1 _Approval by the MF for the allocation of financial resources in the Agency's 2026 MK</i> <i>ANNEX 18 _Part 2 _Approval by the MF for the allocation of financial resources in the Agency's 2026 MK</i></p> |
| <p>Checks performed in the verification of the step and related findings</p> | <p>The Agency has timely submitted to the Ministry of Finance as the competent body for granting consent for employment: The Annual Employment Plan for 2025, which included the recruitment needs for staff with the appropriate criteria for each position. Also, several requests have been submitted to the Ministry of Finance for obtaining consent for staffing the Agency (permanent,</p> |

indefinite, or with work contracts), referring to the Growth Plan and the activity that needs to be implemented.

The Agency also proposed the full staffing measure, which is foreseen and included in the "National Strategy for Strengthening the Capacities for Financial Investigations and Confiscation 2024-2028" and the Agency's Action Plan, with a set deadline for implementation in the second quarter of 2025.

Along with the process of equipping the Agency by public announcements, a process of strengthening the capacities of the Agency by transfers of staff from other public institutions will run parallel.

Also, in May 2025, a functional analysis of the systematized jobs was prepared in accordance with the Law on Public Sector Employees and was finalized on 30.05.2025. It contains proposed recommendations for taking future steps.

Regarding the implementation of the RA steps the Managerial Board of the Agency for Management of Confiscated Property, through the Agency, submitted Information to the Government with Draft Conclusions.

The Agency requested an extension of the 2025 financial approval into 2026 on 25 December 2025.

An Annual Recruitment Plan 2026 was prepared for 18 permanent positions; and submitted to the Ministry of Finance on 26 Dec 2025.

In accordance with the conducted functional analysis and the recommendations provided by an external expert, a reorganization of the Agency's organizational structure has been implemented. The report entitled "Identification of Positions for the Reorganization of Sectors" has been submitted as an attachment. Within this process, the total number of systematized positions has been rationalized from 79 to 65.

The situation following the new systematization is as follows:

Total number of systematized positions: 65

- 42 filled positions
- 1 position currently in the process of recruitment
- 18 vacant positions (approval obtained from the Ministry of Finance)
- 4 positions to remain unfilled due to the need for professional development and upskilling of the existing staff

The reduction in the number of positions results from the identification of unsuitable, duplicated, as well as general-purpose positions that do not directly contribute to the core mission of the Agency. The reorganization is focused on enhancing the quality, professionalism, and competency of human resources.

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| | <p>Approval has been obtained from the Ministry of Finance for the allocation of financial resources in the Agency's 2026 Budget for the employment of 18 persons and one promotion.</p> <p>Accordingly, the Agency ensures adequate human and institutional capacity for the full and efficient performance of the new competences established by the new law, in accordance with the envisaged step.</p> |
| Compliance with general principles and DNSH principle | <p>The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement.</p> <p><i>The implementation of the steps does not contravene the 'Do No Significant Harm' principle (DNSH).</i></p> |
| Double funding | <p><i>Contributions from third parties were not reported in support of the achievement of this step.</i></p> |
| Clear conclusion on the achievement of the step | <p>Fully Achieved</p> |