



Ministry of Finance  
Directorate for management of the  
EU pre-accession funds structures



## ANNEX A: REQUEST FOR THE RELEASE OF FUNDS

I declare that, for the implementation of the EU financial assistance to Montenegro under the Facility for the period first half of 2026, based on my own judgement and on the information at my disposal, as well as on the evidence enclosed, the payment conditions set out in the Montenegro Reform Agenda for the following steps have been fulfilled:

| REFORM                                        | STEP    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | FINANCIAL VALUE     |
|-----------------------------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| 2.1.1                                         | 2.1.1.1 | The complete transposition of the electricity integration package in accordance with the requirements of the Energy Community and the continuation of its implementation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2,317,185.60        |
| 2.3.2                                         | 2.3.2.1 | Adoption of legislation in accordance with the Renewable Energy Directive (RED II), including a regulatory framework for prosumers and simplification of procedures for issuing permits (e.g., establishing a single point of contact)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2,317,185.60        |
| <b>Total (steps with deadline 28/02/2025)</b> |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>4,634,371.20</b> |
| 1.1.1                                         | 1.1.1.2 | Corporate Governance and Accountability. Amend the corporate law or adopt a new law/by-law act in order to introduce new rules and criteria for the appointment and selection of members of the management/supervisory boards of state-owned enterprises. Nominations will be subject to an open, independent, merit-based selection process, while simultaneously increasing diversity and the number of independent board members. Strengthen governance, ownership functions, and oversight of state-owned enterprises by establishing performance-based incentives for evaluating the efficiency of state-owned enterprises, based on mandatory annual financial reports, which should be made available in the SOE register | 4,634,371.20        |
| 1.1.2                                         | 1.1.2.3 | Anti-Corruption Framework. Following the adoption of the Law on Amendments to the Law on the Prevention of Corruption, the anti-corruption framework, as well as the integrity and conflict of interest framework for public procurement, should be revised and the amendments implemented                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2,317,185.60        |
| 1.1.3                                         | 1.1.3.1 | In alignment with the Law on the Registration of Business Entities, the new Law on Business Entity Registration will recognize and define the status of active and inactive companies. The Business Registry                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 1,158,592.80        |

| REFORM                                        | STEP    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | FINANCIAL VALUE      |
|-----------------------------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|                                               |         | is regularly updated to remove defunct companies in accordance with the provisions of the Law on the Registration of Business Entities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                      |
| 4.2.1                                         | 4.2.1.2 | The Constitution amended in accordance with the EU acquis and European standards on the independence, accountability, integrity, impartiality, and professionalism of the judiciary and prosecution, including addressing the existing recommendations of the European Commission, the Venice Commission's opinions, and the recommendations of the Group of States against Corruption (GRECO)                                                                                                                                                                                                                                                                                   | 4,634,371.20         |
| 4.5.1                                         | 4.5.1.1 | Connecting and accessing the databases of the Revenue and Customs Administration and other state authorities with which the Special Prosecution Office cooperates                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2,317,185.60         |
| <b>Total (steps with deadline 30/06/2025)</b> |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>15,061,706.40</b> |
| 1.1.2                                         | 1.1.2.5 | The Parliament will adopt a new Law on Protection of Competition and a new Law on State Aid Control, ensuring full financial independence of the Agency for Protection of Competition and State Aid Control in order to improve state aid control and competition rules                                                                                                                                                                                                                                                                                                                                                                                                          | 2,317,185.60         |
| 1.1.4                                         | 1.1.4.3 | Enabling the functionality of the electronic cadastre                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1,158,592.80         |
| 1.1.5                                         | 1.1.5.2 | Improvement of the Legislative Framework and Focus on the Informal Economy.<br>Adopt and implement amendments to the Misdemeanor Law, the Law on Inspection Supervision, the Law on the Prevention of Illegal Business, as well as the Criminal Code of Montenegro, in order to strengthen supervision over inspectors (including the right to enter residential premises where there is suspicion of unregistered business activities).<br>Additionally, introduce appeal procedures, abolish territorial jurisdictions, eliminate the possibility of discretionary decisions, and ensure the fulfillment of prerequisites for a systematic fight against the informal economy. | 3,475,778.40         |
| 1.2.1                                         | 1.2.1.1 | Alignment with Regulation (EU) 2020/1056 on electronic freight transport information (eFTI)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2,317,185.60         |
| 2.2.2                                         | 2.2.2.1 | Full implementation of Monitoring, Reporting, Verification, and Accreditation (MRVA)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3,475,778.40         |
| 2.3.4                                         | 2.3.4.3 | Adoption of the Air Quality Management Strategy for the period 2024-2029, including the development/updating of air quality plans for zones where the air quality limit values have been exceeded, in accordance with the National Emission Ceilings (NEC) Directive                                                                                                                                                                                                                                                                                                                                                                                                             | 2,317,185.60         |
| 2.4.2                                         | 2.4.2.1 | Compliance with the EU decision on digital identity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2,317,185.60         |
| 2.4.4                                         | 2.4.4.4 | The National and Government CIRT are operational in accordance with the requirements of NIS2 and have                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2,317,185.60         |

| REFORM                                        | STEP    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | FINANCIAL VALUE      |
|-----------------------------------------------|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|                                               |         | achieved at least the "accredited" status on the TF CSIRT Trusted Introducer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                      |
| 3.1.1                                         | 3.1.1.3 | Work based learning in higher education: 20% of total students (of which approx. 50% women) benefit from substantial work-based learning with employers during their respective education                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 4,634,371.20         |
| 3.2.1                                         | 3.2.1.1 | Tendering procedures launched for construction or refurbishment of schools as required to reduce the number of shifts in most overcrowded primary schools from current 5 shifts to 3 by December 2027                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 1,158,592.80         |
| 4.1.1                                         | 4.1.1.1 | Comprehensive review of the electoral legal framework, implementation of ODIHR recommendations (2023)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3,475,778.40         |
| 4.6.1                                         | 4.6.1.1 | Montenegro has achieved interoperability between the systems and databases used in the currently valid visa issuance system                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 3,475,778.40         |
| <b>Total (steps with deadline 31/12/2025)</b> |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>32,440,598.40</b> |
| 1.1.1                                         | 1.1.1.4 | Risk management, internal audit and audit committees. SOE will establish an independent internal audit function and risk management in accordance with internationally recognized frameworks and standards (International Professional Practices Framework adopted by the Auditing Standards Board of the Institute of Internal Auditors (IIA), i.e. the Global Internal Auditing Standards (IIA) adopted by the Institute of Internal Auditors (IIA) and the COSO Integrated Internal Control Framework), as well as EU good practice on Public Internal Financial Control (PIFC). Furthermore, PVD will establish functional audit committees in accordance with the relevant law | 2,317,185.60         |
| 1.2.1                                         | 1.2.1.2 | Ratification of the International Convention on Roads (eCMR) required for the implementation of eFTI                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2,317,185.60         |
| 2.1.1                                         | 2.1.1.2 | Continued implementation of the electricity integration package by transmission system operators and NEMO (Nominated Electricity Market Operators) by joining the single European energy market day-ahead                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2,317,185.60         |
| 2.3.2                                         | 2.3.2.3 | One of the energy communities established and operational                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 1,158,592.80         |
| 3.2.2                                         | 3.2.2.3 | 17% of the total number of primary and secondary schools have an EdTech Hub, and 25% of students (of which roughly 50% are girls) have the opportunity to use it                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 3,475,778.40         |
| 4.1.1                                         | 4.1.1.2 | Amendments to the Law on the Election of the President of Montenegro                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2,317,185.60         |
| 4.3.1                                         | 4.3.1.3 | Improved track record in the area of investigations, prosecutions, final convictions, confiscation and final confiscation in corruption, including high-level corruption cases. Demonstrate an overall increase in                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 4,634,371.20         |

| REFORM                                        | STEP    |                                                                                                                                                                                                                                                                                                                                    | FINANCIAL VALUE      |
|-----------------------------------------------|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|                                               |         | the number of investigations, confirmed indictments and convictions, including high-level corruption cases; demonstrate an increase in the number and total value of seizures, freezing and confiscation of proceeds of crime; demonstrate an increase in independent financial investigations                                     |                      |
| 4.4.3                                         | 4.4.3.3 | Increased the number of general practitioners at the Health Centre in Spuž                                                                                                                                                                                                                                                         | 1,158,592.80         |
| 4.5.1                                         | 4.5.1.4 | Demonstrate an overall increase in the number of investigations, confirmed indictments and convictions, including in high-level corruption cases; demonstrate an increase in the number and total value of seizures, freezing and confiscation of criminal assets; demonstrate an increase in independent financial investigations | 4,634,371.20         |
| <b>Total (steps with deadline 30/06/2026)</b> |         |                                                                                                                                                                                                                                                                                                                                    | <b>24,330,448.80</b> |
| 1.2.2                                         | 1.2.2.2 | The number of companies benefiting from the services of innovation/technology centers as a result of their launched and publicly available list of services for companies has increased by 50%                                                                                                                                     | 2,317,185.60         |
| 2.3.4                                         | 2.3.4.6 | Increasing the annual renovation rate of buildings and street lighting in line with the targets agreed at the Energy Community level: at least 130,000 m2 renovated by December 2026                                                                                                                                               | 4,634,371.20         |
| 3.1.2                                         | 3.1.2.1 | Two active labour market measures programmes specifically targeting women are being implemented in the context of introducing a revised methodology targeting women, in line with ESF+ requirements                                                                                                                                | 2,317,185.60         |
| 4.6.1                                         | 4.6.1.5 | Abolition of visa-free agreements with countries (at least one country per year) for which the EU requires a visa                                                                                                                                                                                                                  | 4,634,371.20         |
| 4.4.2                                         | 4.4.2.2 | Improved records of judicial monitoring and final court decisions in discrimination cases                                                                                                                                                                                                                                          | 3,475,778.40         |
| <b>Total (steps with deadline 31/12/2026)</b> |         |                                                                                                                                                                                                                                                                                                                                    | <b>17,378,892.00</b> |
| 3.2.2                                         | 3.2.2.4 | 34% of the total number of primary and secondary schools have an EdTech Hub, and 50% of students (of which approximately 50% are girls) have the opportunity to use it                                                                                                                                                             | 3,475,778.40         |
| <b>Total (steps with deadline 30/06/2027)</b> |         |                                                                                                                                                                                                                                                                                                                                    | <b>3,475,778.40</b>  |
| <b>Total (all steps)</b>                      |         |                                                                                                                                                                                                                                                                                                                                    | <b>97,321,795.20</b> |

On the basis of the above I request that the amount of EUR 97,321,795.20 is made available, EUR 45,254,634.77 disbursed directly to the treasury of Montenegro, and EUR 52,067,160.43 to be made available through the Western Balkans Investment Framework (WBIF), of which EUR 24,135,805.21 in the form of loans and EUR 27,931,355.22 in the form of non-repayable support<sup>12</sup>.

I hereby attach an assessment of each step, the required evidence showing the satisfactory fulfilment of the qualitative and quantitative steps set out in the relevant Annex to the Commission implementing decision<sup>3</sup> and other information requested as per Article 14 of the Facility Agreement.

I hereby also declare that measures related to the reforms for which satisfactory fulfilment has been declared previously in prior Commission decisions have not been reversed by Montenegro.

Podgorica, 15-07-2026



Milica Adžić

**STATE SECRETARY/  
DEPUTY COORDINATOR FOR REFORM AGENDA 2024-2027**

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- <sup>1</sup> Subject to rules laid down in Articles 16 and 17, each instalment shall draw from the indicative financial contributions set out in Article 2 paragraph 2, as follows: a) 28.7% from the non-repayable support and 24.8% from the loan support, in sum 53.5%, to be made available through the Western Balkans Investments Framework (WBIF), and b) 46.5% from the loan support to be channelled directly to the treasury.
- <sup>2</sup> A condition precedent to the disbursement of the loan to the Treasury, to be channelled to the WBIF, is the submission of the signed contribution arrangement with the WBIF. This signed arrangement must be provided before any loan disbursements are processed.
- <sup>3</sup> CID C(2024) 7375 final, from 23/10/2024