

SPECIAL REPORT

on the Established Conditions in the
Financing of the Election Campaign
for the Election of Mayors and Municipal
Council Members in the Municipalities of the
Republic of North Macedonia 2025

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1 INTRODUCTION

Every election cycle represents a significant challenge in the management of public resources and the activities of state institutions. In order to prevent corruption and the misuse of public funds, it is essential to apply effective oversight and to strictly comply with the legal restrictions. In this regard, the State Commission for Prevention of Corruption (SCPC) has a central role in ensuring the legality, objectivity, and transparency of all activities taking place during the election period.

The election campaign is a process that directly affects the spending of funds by campaign participants and shapes public opinion among the electorate regarding a particular candidate. Therefore, the legality of the sources of funds used to finance the campaign and the legality of the way in which those funds are spent are a fundamental precondition for fair political competition among participants in the election campaign.

In accordance with its competences laid down in the Law on Prevention of Corruption and Conflict of Interest and the Electoral Code, the SCPC was actively engaged in preventing and combating corruption during the electoral process for the election of mayors and members of municipal councils in the Republic of North Macedonia in 2025.

Through the monitoring of the financial operations of election campaign participants, the SCPC takes preventive anti-corruption measures. Chapter IV — Prevention of Corruption in Politics — of the Law on Prevention of Corruption and Conflict of Interest regulates the procedures and measures undertaken by the SCPC to prevent abuses related to campaign financing, the management of public assets, and the use of public funds during the election process. These activities begin on the day the elections are called and continue until their completion.

Within the framework of its legal competences, the SCPC established cooperation with the State Election Commission, the Agency for Audio and Audiovisual Media Services, the State Audit Office, the Central Registry of the Republic of North Macedonia, the Ministry of Internal Affairs, the Clearing House – Clearing Interbank Systems, as well as with other state authorities and institutions. This cooperation serves to secure data and establish records for all registered participants in the election campaign. The data obtained are used in the handling of cases falling within the Commission's competence.

By publishing announcements and notices on the legal restrictions applicable to all state authorities and institutions during the electoral process, the SCPC informed all relevant entities of their legal obligations and limitations in order to prevent potential abuses and corrupt practices. Through these activities, the SCPC ensures that the electoral process is conducted transparently and lawfully, preventing all forms of corruption and misuse of public resources and public property.

In order to achieve the highest quality, the SCPC cooperated with and received support from the International Foundation for Electoral Systems (IFES) and the Association for Research and Analyses – ZMAI. Their contribution and expertise were of particular importance for the successful preparation of this report, for which we extend our special gratitude.

The contribution of the SCPC to the prevention and suppression of corruption in electoral processes is of key importance, through investment in systems and processes that protect the integrity of institutions, ensure the responsible use of public funds, and promote credible and transparent reporting.

2. Legal framework

The electoral process in the Republic of North Macedonia, including local elections, is founded on constitutional principles and on a set of laws and by-laws that together provide the legal framework for organizing, conducting, and supervising elections. The Constitution guarantees local self-government as a constitutional principle and establishes the municipalities and the City of Skopje as the basic units of local self-government, while the territorial organization and key issues related to local elections and local financing are regulated by law. These constitutional foundations define the framework within which local elections are conducted and underscore the need for a stable, clear, and consistently applicable legal framework.

Local self-government is further regulated through systemic laws, including the Law on Local Self-Government, the Law on the Territorial Organization of Local Self-Government, and the Law on the City of Skopje. Although these laws do not regulate the course of the electoral procedure, they are directly relevant to local elections because they govern the scope and organization of municipalities, the special status of the City of Skopje, the number of council members, and certain aspects of local functioning that are relevant in the electoral context.

The key legal act governing local elections is the Electoral Code, which regulates the rules and procedures for electing mayors and members of municipal councils and the Council of the City of Skopje, as well as all phases of the electoral process: the recording of electoral rights, maintenance of the Voters' List, designation and publication of polling stations, procedures for candidacies and electoral lists, the conduct of the election campaign, the conduct of voting, the determination of results, and the handling of electoral complaints and disputes. The Code also establishes rules for the election campaign and restrictions designed to protect the integrity of the process and reduce the possibility of misuse of public resources or unequal treatment of participants.

The by-laws of the State Election Commission (SEC) operationalize the statutory framework through guidelines, rulebooks, and decisions that specify the technical and organizational aspects of elections. These acts are important for the practical application of the Electoral Code because they ensure a uniform approach in carrying out electoral activities and provide predictability and legal certainty for participants and institutions alike.

The competences of the State Commission for Prevention of Corruption with regard to the prevention of corruption in politics and the protection of the public interest during elections are regulated by the Law on Prevention of Corruption and Conflict of Interest and by the Electoral Code. These legal provisions position the SCPC as a key preventive and supervisory mechanism in the electoral process by monitoring the legality of election campaign financing, following risks related to the misuse of public funds and resources, acting upon complaints and submissions and upon cases opened on its own initiative, and initiating measures before competent bodies where there are grounds for suspicion that the law has been violated.

The Criminal Code rounds out the legal framework by criminalizing offenses against elections and voting, including bribery, violations of the right to vote, election fraud, and the misuse of funds for election campaign financing. The existence of criminal-law protection is significant because it provides an additional deterrent effect against violations of the law and a basis for action in cases where more serious forms of irregularity are established. Through the exercise of its competences, the SCPC monitors the activities of election campaign participants with a view to ensuring the legality, transparency, and integrity of the electoral process.

3. Competences and actions of the SCPC

The State Commission for Prevention of Corruption has an active role in monitoring the possible misuse of budget funds during elections. The Commission's competences are exercised through preventive, monitoring, and supervisory activities carried out continuously from the day the elections are called until the conclusion of the electoral process. These competences and procedures are regulated by the Law on Prevention of Corruption and Conflict of Interest, in particular Chapter IV — Prevention of Corruption in Politics (Articles 32 to 37).

Under these provisions, the SCPC monitors the legality of election campaign financing, oversees the legality of the use and disposal of budget funds, acts in cases of suspected non-compliance with the prohibition on new investments and extraordinary disbursements, prevents the use of unlawful or anonymous sources of campaign financing, and identifies abuses involving political party financing during an election campaign or the bribery of voters.

In carrying out its preventive role, at the very beginning of the election period the SCPC publishes a public notice informing state authorities and holders of public powers of the legal restrictions applicable during the election period. Through its notices, guidance, and communication with institutions, the SCPC contributes to timely information on prohibitions and obligations and to reducing the risk of violations. Preventive action seeks to create a clear boundary between regular institutional functioning and electoral competition, with particular emphasis on the risks of misuse of public resources and influence over administrative processes during a sensitive period.

At the same time, the Commission proactively follows the election process by mobilizing its institutional and human resources and by establishing cooperation with relevant institutions and bodies for the purpose of obtaining data and information. The SCPC analyzes the financial reports submitted by participants in the election process, as well as other relevant data, in order to determine whether the financing and spending of funds are taking place in accordance with the applicable legal framework. In this respect, the Commission focuses on the legality of funding sources, the compliance of donations with permitted limits and rules, the timeliness and accuracy of financial reporting, and the transparency of published information.

In addition, the SCPC is required to monitor the rules laid down in the Electoral Code and the Law on Financing of Political Parties. These laws regulate the manner in which state and municipal institutions act during the election period, the rules governing the financing of campaign participants, and the manner in which election campaigns are conducted. The SCPC acts upon complaints from citizens or legal entities and opens cases on its own initiative when public information, media reports, or other sources give rise to suspicion that the legal provisions may have been violated.

For the purpose of verifying the allegations and establishing the factual situation, the SCPC initiates proceedings within which it checks the suspicions by collecting data and information from other institutions. After processing the data, it adopts decisions on individual cases at public sessions. Where there are grounds for suspicion of violations of the law, the Commission submits initiatives to the competent state bodies requesting appropriate action. This approach creates a functional link between prevention and enforcement and enables a timely response whenever there is a risk to the legality and integrity of the electoral process.

This approach ensures a functional link between prevention and enforcement, thereby enabling a timely response whenever there is a risk of undermining the legality and integrity of the electoral process. The monitoring of the legality of financing is carried out continuously and throughout all phases of the electoral process, with particular emphasis on the control of election campaign financing, the prevention of misuse of budget funds, compliance with the prohibition on new public investments and extraordinary payments, as well as the prevention of the use of unlawful sources of financing. These activities constitute a key mechanism for safeguarding the public interest and preserving the integrity of the electoral process.

A particularly important segment of the work of the State Commission for Prevention of Corruption (SCPC) during the electoral period is the promotion of transparency and accountability. Within the scope of its competences, the Commission contributes to informing the public about key aspects of the electoral process related to risks of corruption and misuse of resources, as well as to financial reporting. Transparent action and public identification of systemic weaknesses and challenges play an important role in building trust in institutional oversight and in encouraging the public to report irregularities.

The scope of the SCPC's analysis includes the following:

- **Analysis of the types of financing sources** - with the aim of determining their legality, transparency, and compliance with the applicable legal framework;
- **Verification of the amount of donations** - including the monitoring and review of individual and total donation amounts, with a particular focus on compliance with statutory limits and the prevention of prohibited financing;
- **Monitoring the legality of the use and disposal of budget funds** - namely oversight of the use of public, i.e. budgetary, funds during the election campaign in order to determine whether they have been used in accordance with the law, their intended purpose, and the principles of sound public financial management;
- **Control of campaign expenditure** - including verification of the total expenditure incurred during the election campaign, its structure, and its compliance with legally established limitations and permitted categories of expenditure;
- **Verification of the statutory deadlines for the preparation and submission of financial reports** - including monitoring whether the financial reports on the revenues and expenditures of the election campaign account have been prepared in a timely manner, in accordance with the legally prescribed deadlines and forms, and duly submitted to the SCPC.

Within each electoral process, the SCPC additionally monitors the fulfilment of the obligations of participants in the electoral process relating to their registration, through the collection of data from the competent authorities, as well as the proper and lawful recording and presentation of all revenues and expenditures related to the election campaign.

In addition to its established competences, the Commission faces practical limitations arising from legal gaps and from insufficiently precise or inconsistently applicable normative solutions. In certain situations, there are aggravating circumstances in securing complete and timely information from institutions, or appropriate misdemeanour mechanisms for non-compliance with legal obligations are lacking, which limits the effectiveness of oversight. These challenges underline the need for the continuous improvement of the legal and institutional framework in order to ensure more effective prevention of abuses and stronger integrity of the electoral process.

Pursuant to Article 32 of the Law on Prevention of Corruption and Conflict of Interest, the SCPC prepares a Special Report on the established situation regarding the financing of the election campaign, which sets out the identified findings and

provides recommendations for overcoming the observed weaknesses. This report is submitted to the Assembly of the Republic of North Macedonia within three months from the day the elections are concluded.

3.1 Activities prior to the start of the election campaign

The Law on the Prevention of Corruption and Conflict of Interest and the Electoral Code set out the competences, activities, and deadlines for the State Commission for Prevention of Corruption (SCPC) in relation to monitoring political parties and election campaigns.

On 9 August 2025, the Assembly of the Republic of North Macedonia adopted the Decision Calling Elections for members of the municipal councils and the Council of the City of Skopje, as well as for mayors of the municipalities and the Mayor of the City of Skopje, No. 09-4408/1 of 9 August 2025. Article 2 of the Decision stipulates that “the elections shall be held on 19 October 2025.” Following the publication of the Decision, the SCPC undertook activities aimed at organising the resources at its disposal, both human and technical, in order to establish effective monitoring of the legality of election campaign financing.

3.1.1. Inter-institutional cooperation

With a view to strengthening inter-institutional cooperation with respect to the conduct of institutions during the 2025 local elections, especially those institutions whose competences include action during an election process, several working meetings were organized:

- **A working meeting with the President and several members of the State Election Commission**, attended by representatives of the OSCE Mission in Skopje, dedicated to deepening cooperation between the two institutions. The meeting focused particularly on issues related to integrity in the electoral process and on the need to formalize mutual coordination through a Memorandum of Cooperation in order to create conditions for swift and coordinated action in cases of potential conflict of interest and other situations requiring urgent assessment and an institutional response.
- **A working meeting with the Public Prosecutor of the Republic of North Macedonia**, the Chair of the temporary commission within the Public Prosecutor’s Office responsible for monitoring possible election irregularities, and public prosecutors from the Public Prosecutor’s Office, at which information was exchanged on the composition, competences, and activities of the temporary commission charged with monitoring action in relation to possible election irregularities involving criminal offenses under Chapter 16 of the Criminal Code — offenses against elections and voting — as well as other criminal offenses that might be committed in organizing and conducting the elections. At this meeting, both institutions emphasized their readiness to cooperate throughout the election process.
- **A Memorandum of Cooperation was signed between the State Commission for Prevention of Corruption, the State Election Commission, and the State Audit Office.** Through this memorandum, the three institutions strengthened their commitment to direct cooperation, coordination, and mutual assistance in implementing the provisions governing campaign financing, exchanging information and data, and taking timely action in response to identified irregularities, particularly in relation to complaints, objections, and other procedures of common interest.
- **A working meeting with a representative of the OSCE Observation Mission** at which the SCPC’s legal competences and role in the electoral process were presented. The current and planned activities of the SCPC in relation to

monitoring the election process were explained, with the aim of ensuring transparent and lawful use of public assets and budget funds, as well as the challenges faced by the SCPC in monitoring the election process, including systemic weaknesses and ambiguities in the election legislation. At this meeting, the parties agreed on mutual cooperation and intensive communication throughout the entire election process.

3.1.2. Announcements and other forms of public information

With a view to informing the public about the legal restrictions and activities applicable during the electoral process, as well as to ensuring easier reporting of suspected irregularities during the electoral process, the State Commission for Prevention of Corruption (SCPC) published several announcements on its website and made available several tools to facilitate the submission of reports by citizens concerning suspected electoral irregularities, namely:

- **a form entitled Report of Suspected Illegalities and Violations in the Electoral Process and the Election Campaign for the 2025 Local Elections**, through which any interested party in the Republic of North Macedonia could report electoral violations during the conduct of the electoral process;
- **a notice intended to provide timely and transparent information to state and local government authorities, other state bodies, and the public regarding the legality of the use and disposal of budget funds from the day the 2025 Local Elections** were called, in connection with the competences and obligations, that is, the obligations laid down in **Articles 34 and 36 of the Law on the Prevention of Corruption and Conflict of Interest** and **Articles 8-a and 8-b of the Electoral Code**, according to which the responsible persons in the funds, agencies, directorates, public enterprises, regulatory bodies, companies established by the state, and other institutions established by the state, as well as political parties and participants in the election campaign, are required to comply with the statutory restrictions during the electoral process;
- **a web application entitled Register of Vehicles of State Authorities, Local Self-Government Bodies, Public Enterprises, or Other Legal Entities Managing State Capital** was made available for the reporting of unauthorised use of official vehicles for electoral purposes, together with an annexed form, **Table for Submission of Vehicle Data**, containing the information to be completed and submitted to the SCPC's email address.

3.2 Activities during the election campaign

Within the scope of its activities during the electoral period, as in previous electoral cycles, the State Commission for Prevention of Corruption (SCPC) stated that it does not have the legal competence to issue opinions regarding the application of the provisions of Articles 8-a and 8-b of the Electoral Code and Article 34 of the Law on the Prevention of Corruption and Conflict of Interest. Nevertheless, despite these clarifications, during this electoral period the SCPC received a total of 246 (two hundred and forty-six) requests for opinions from state authorities, legal entities established by the state, and natural persons. These requests concerned questions relating to the undertaking of specific activities in the context of compliance with the prohibitions laid down in Articles 8-a and 8-b of the Electoral Code and Article 34 of the Law on the Prevention of Corruption and Conflict of Interest. In response to all of these requests, a notice was issued stating that the State Commission for Prevention of Corruption has no legal basis or competence to issue an opinion or grant approval in relation to the submitted requests for opinions. The notices further indicated that, when deciding

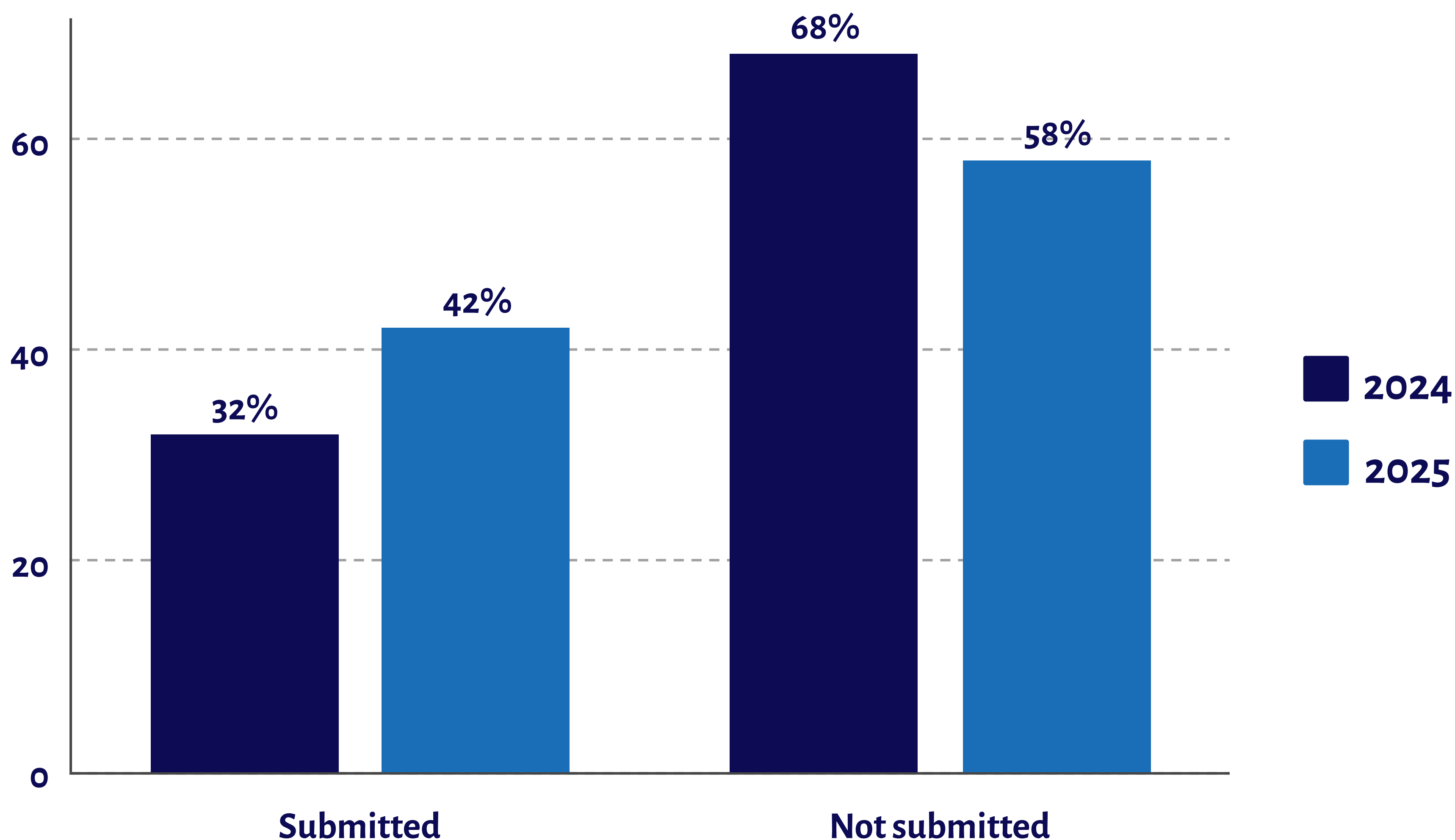
whether or not to carry out certain activities, from the date of adoption of the decisions calling the elections until the conclusion of the local elections, the prohibitions established in Articles 8-a and 8-b of the Electoral Code and Article 34 of the Law on the Prevention of Corruption and Conflict of Interest must be respected, and that compliance with these provisions is the responsibility of the responsible persons in the state authorities and other relevant entities.

Pursuant to Article 8-b, paragraph 2 of the Electoral Code, public funds, public enterprises, and all other legal entities managing state capital are obliged, within ten days from the adoption of the decision calling the elections, to submit data to the SCPC on the number, type, registration plates, and condition of the official motor vehicles at their disposal.

Pursuant to Article 8-b, paragraph 5 of the Electoral Code, if the entities fail to submit the required data, the SCPC is obliged to initiate misdemeanour proceedings within 15 days after the expiry of the deadline for submission of the data. However, due to a legal gap in the Electoral Code, whereby no misdemeanour sanctions are prescribed, the SCPC has no possibility of initiating misdemeanour proceedings on this basis. In view of the absence of a normative solution for sanctioning such non-compliance, and with the aim of preventing the misuse of official vehicles for the purposes of the election campaign, the SCPC sent a notice to the Ministry of Interior requesting data on all official vehicles used by state institutions. The Ministry of Interior responded to the request, thereby providing data for 1,557 institutions. In addition, the SCPC sent notices to the authorities responsible for appointing and electing managerial officials, namely the Assembly of the Republic of North Macedonia, the Government of the Republic of North Macedonia, and the Association of the Units of Local Self-Government of the Republic of North Macedonia (ZELS), containing data on those institutions that had failed to submit the required information.

As only a small number of institutions and state authorities responded to the request to update the data in the Vehicle Register, the Commission publicly disclosed all institutions that failed to provide the required information within the statutory deadline.

Chart 1. Number of institutions that submitted data on official vehicles compared with the MIA vehicle register



Source: SCPC administrative data

4. DATA FROM THE FINANCIAL REPORTS

4.1 Revenue

In the context of the conduct of the local elections, the State Commission for Prevention of Corruption (SCPC) actively exercises its competence with a view to ensuring integrity and legality in the financing of the election campaign. In particular, the Commission monitors the manner in which funds are secured, recorded, and used by participants in the electoral process.

Pursuant to Article 83 of the Electoral Code, an election campaign may be financed through funds transferred from the regular account of the political party, through membership fees, donations from natural and legal persons, as well as through loans obtained for the election campaign. During the campaign, donations may be received in the form of money, goods, and services from natural persons up to EUR 3,000 in denar equivalent, and from legal persons up to EUR 30,000 in denar equivalent. All donations must be paid into a separate transaction account and recorded in a donations register, and where the amount exceeds the permitted limit, the difference must be transferred to the state budget. These restrictions must be observed by all participants in the campaign.

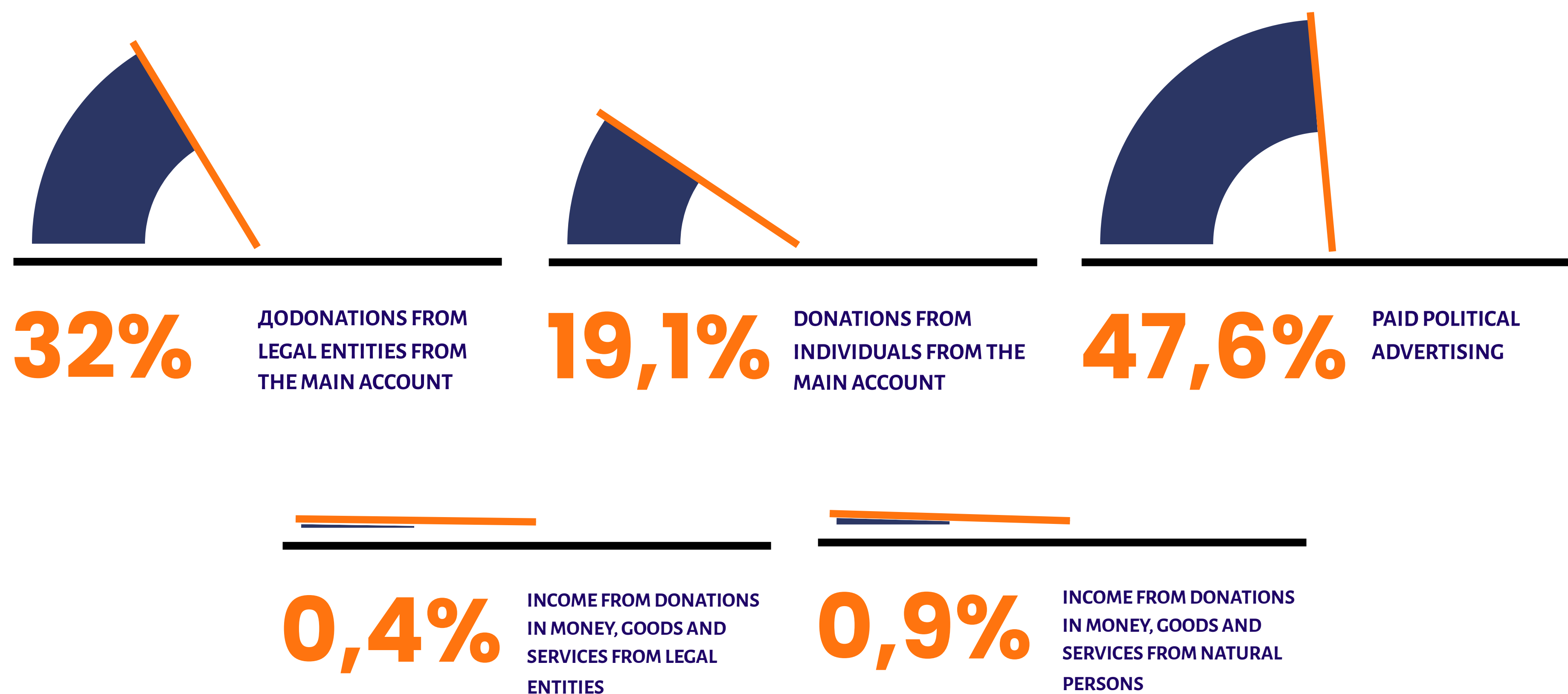
Within the framework of its statutory competences, the SCPC has an active role in overseeing these processes, particularly with regard to ensuring the transparency of financing sources and determining their compliance with the statutory restrictions. The Commission carries out procedures for the verification and analysis of data from the financial reports and bank statements of all participants in the electoral process.

In accordance with the legal provisions governing the financing of paid political advertising in the media during the election campaign, the funds for this purpose are provided from the Budget of the Republic of North Macedonia and are disbursed through the State Election Commission (SEC). The SCPC monitors the allocation and disbursement of these funds on the basis of the data contained in the financial reports and the data submitted by the State Election Commission.

The analysis of the reports submitted to the SCPC by the participants in the electoral process shows that the structure of election campaign revenues is predominantly composed of funds for paid political advertising (PPA) and transfers of funds from the main transaction accounts of the political parties to the election campaign accounts. According to the submitted data, the largest single item is PPA in the amount of MKD 284,156,613, representing 47.6% of the total recorded revenues. At the same time, transfers from the parties' main accounts amount to a total of MKD 305,256,790 (51.1%), of which MKD 190,902,831 are recorded as funds transferred from donations by legal persons, and MKD 114,353,959 as funds transferred from donations by natural persons.

The revenues reported directly to the election campaign accounts under the category "donations in money, goods, and services" are significantly lower and amount to a total of MKD 7,930,272 (1.3%), namely MKD 2,756,650 from legal persons and MKD 5,173,622 from natural persons. The total amount of revenues covered by this structure is MKD 597,343,675. The chart below presents the overall revenue structure by source, bearing in mind that part of the funds are recorded as transfers from the main party accounts, while another part is reported as direct revenues to the election campaign accounts.

Chart 2 Total amount of revenues by source



Source: SCPC administrative data from overall financial statements

The analysis by main sources of revenue shows that the largest share of donations does not enter the election campaign accounts directly, but is first accumulated in the main accounts of the political entities and only then transferred. The total funds, excluding paid political advertising and funds from the budget, amount to MKD 147,204,675, of which as much as MKD 139,251,403, or 94.6%, are donations received in the main account. This indicates a strong predominance of an indirect financing model through the regular financial operations of political parties, rather than direct donations to the election campaign account.

Within these transferred donations from the main accounts, the largest amount relates to donations from natural persons in the amount of MKD 114,330,959, while donations from legal persons amount to MKD 24,920,444.

Direct donations to the election campaign accounts, in the form of money, goods, and services, are significantly smaller in scale and amount to a total of MKD 7,953,272, representing only 5.4% of the total funds. Of this amount, the largest share consists of monetary donations from natural persons amounting to MKD 4,952,032 and monetary donations from legal persons amounting to MKD 2,417,500, while donations in the form of services or goods remain marginal, namely MKD 339,150 from legal persons and MKD 244,590 from natural persons. This confirms the finding that non-monetary donations, although formally recognised within the system, have limited practical significance in the overall financing structure.

In the overall structure of all recorded revenues, paid political advertising (MKD 284,156,613) and funds from the budget (MKD 165,982,387) together amount to MKD 450,139,000, or approximately 75.4% of total inflows. This further confirms that, in addition to the importance of private donations, the dominant financial capacity of election campaigns remains concentrated in public sources related to the electoral process, while private donations play a supplementary rather than primary role in financing the majority of participants.

Chart 3 Total amount of revenues by source subtype



Source: SCPC administrative data from overall financial statements

As part of the analysis conducted on the revenues of participants in the 2025 local elections, the data obtained from the submitted financial reports and the recorded banking transactions indicate the existence of significant discrepancies arising from the incomplete fulfilment of the obligation to submit comprehensive financial reports by participants in the electoral process (only 46% of participants submitted a comprehensive financial report on the election campaign).

According to the financial reports submitted by political parties, coalitions, and groups of voters, total recorded revenues amounted to MKD 594,082,033. However, the analysis of the bank statement data shows that total inflows of MKD 596,864,905 were realised in the transaction accounts designated for the election campaign. This figure includes all identified transactions, regardless of whether a comprehensive financial report was submitted and whether the account was closed within the statutory deadline. The difference is relatively small, amounting to MKD 2,782,872, particularly bearing in mind that the participants who did not submit comprehensive financial reports recorded only small and insignificant donations. The amount of funds was derived from 77 comprehensive financial reports processed by the State Commission for Prevention of Corruption (SCPC) and submitted by participants in the electoral process. A total of 166 participants took part in the electoral process^[1], and their opened election bank accounts were also processed, to which the SCPC secured access pursuant to Article 71, paragraph 13 of the Electoral Code. In total, 89 participants in the election campaign failed to submit a final election campaign report to the SCPC, representing 54% of all participants. This discrepancy points precisely to the need to digitalise the process of maintaining and preparing the required reports and to address the systemic weaknesses in the area of sanctioning non-compliance with the law.

[1] Source: State Election Commission - Final Report on the Conducted Elections for Members of Municipal Councils and the Council of the City of Skopje and Mayors of Municipalities and the Mayor of the City of Skopje, 2025

These data confirm that during the electoral process there is a systemic risk of incomplete reporting on the sources and volume of funding, especially when all participants do not act in accordance with legal obligations. This situation makes it difficult to assess the impact of different sources of funding on electoral integrity and creates conditions for possible abuses and concealment of real costs. The Commission recognizes the need to improve control mechanisms and establish sanctions for failure to submit reports, in order to enable full and timely financial transparency for all participants in the electoral process.

Table 1 Total amount of income by source and type of participant

| PARTICIPANT TYPE | DONATIONS FROM LEGAL ENTITIES FROM THE MAIN ACCOUNT | DONATIONS FROM INDIVIDUALS FROM THE MAIN ACCOUNT | PPA | DONATIONS FROM LEGAL ENTITIES (IN MONEY, GOODS AND SERVICES) | DONATIONS FROM INDIVIDUALS (MONEY, GOODS AND SERVICES) | TOTAL |
|--|---|--|--------------------|--|--|--------------------|
| Coalitions | 163.845.208 | 114.353.959 | 277.394.594 | 153.000 | 2.621.000 | 558.367.761 |
| Political parties | 27.057.623 | | 6.486.692 | 186.565 | 854.555 | 34.585.435 |
| Independent candidates supported by a group of voters | | | 275.327 | 2.417.085 | 1.698.067 | 4.390.479 |
| ВКУПНО | 190.902.831 | 114.353.959 | 284.156.613 | 2.756.650 | 5.173.622 | 597.343.675 |

Source: SCPC administrative data from overall financial statements

The analysis of revenues by type of participant in the 2025 local elections, based on the submitted financial reports, shows a significant concentration of funds among coalitions, while political parties and groups of voters reported considerably lower amounts of total available funds for financing their campaigns. Coalitions reported a total of MKD 116,974,959 in donations from natural persons, representing 98% of all donations from this source, as well as donations from legal persons in a total amount of MKD 163,998,208. In addition, coalitions transferred a total of MKD 278,199,167 from their regular accounts. They also reported MKD 277,394,594 for paid political advertising.

The independent participation of political parties in these local elections was limited in number. At the same time, they reported a low volume of financial resources. The largest share of their revenues came in the form of donations from legal persons, amounting to MKD 27,244,188, of which 99.5% were recorded as transfers of funds from their regular accounts. Donations from natural persons to political parties were relatively low, amounting to MKD 854,555, while the amount reported for paid political advertising was only MKD 6,486,692.

Groups of voters, which were the most numerous category of participants in these elections with a total of 120 participants, reported MKD 2,417,085 in donations from legal persons and MKD 1,698,067 from natural persons.

Overall, the analysis shows that coalitions command the largest share of available campaign funds, which is particularly evident in the items related to paid political advertising and donations from natural persons. The total reported revenue from all sources amounts to MKD 683 million.

4.1.1 Distribution of Revenues by Political Position and Source of Financing

The analysis of election campaign revenues by the political status of participants (ruling parties/opposition) and their involvement in coalitions shows significant differences in access to financial sources, revenue structures, and the degree of mobilisation of financial resources.

Political entities that were in power at the time of the elections reported **MKD 287.1 million** in revenues for campaign financing, representing **48% of the total funds** (MKD 597 million). On the other hand, entities considered to be opposition parties, specifically parliamentary parties, reported **MKD 293 million**, or **49% of the total amount**, while the remainder relates to smaller, independent, or non-parliamentary entities.

The largest share of funds among all participants, regardless of political position, relates to **own transferred funds and paid political advertising**, whereby:

- The ruling parties dominate in donations from natural persons, particularly through transfers from their regular accounts, for example the coalitions led by VMRO-DPMNE with MKD 133.8 million.
- Opposition parties show a similar pattern: the coalitions led by SDSM and the NAI Coalition have a comparably high share of own sources and advertising, although on a more limited scale.
- Independent entities or those outside Parliament report significantly lower total amounts and mainly depend on minimal donations and modest sums for media advertising.

The amount of revenues secured for financing the election campaign by each participant is presented in the table below:

Table 2 Total amount of income by participant position and source of funding

| PARTICIPANT TYPE | Participant / income type | Amount of income |
|-----------------------|---|--------------------|
| RULING PARTIES | | 287.127.218 |
| | Coalition led by VMRO-DPMNE | 220.499.682 |
| | Donations to the main account from legal persons | 7.341.000 |
| | Donations to the main account from natural persons | 113.861.509 |
| | PPA | 99.297.173 |
| | Movement ZNAM FOR OUR MACEDONIA | 10.050.686 |
| | Donations to the main account from legal persons | 10.050.686 |
| | Democratic Party of the Serbs in Macedonia – Bratska | 5.010.186 |
| | Monetary donation from natural persons | 110.700 |
| | PPA | 4.899.486 |
| | DEMOCRATIC ALLIANCE | 94.018 |
| | Monetary donation from natural persons | 40 |
| | PPA | 93.978 |
| | VLEN Coalition | 51.472.646 |
| | Monetary donation from natural persons | 2.020.000 |
| | Donation in services or goods from legal persons | 60.000 |
| | PPA | 44.694.646 |
| | Funds from the budget | 4.698.000 |

Table 2 Total amount of income by participant position and source of funding

| PARTICIPANT TYPE | Participant / income type | Amount of income |
|-------------------|--|--------------------|
| OPPOSITION | | 292.963.502 |
| | Coalition led by LDP | 17.381.881 |
| | PPA | 5.947.681 |
| | Funds from the budget | 11.434.200 |
| | NATIONAL ALLIANCE FOR INTEGRATION – NAI | 119.357.514 |
| | Donation in services or goods from legal persons | 90.000 |
| | Donation in services or goods from natural persons | 90.000 |
| | PPA | 63.238.506 |
| | Funds from the budget | 55.939.008 |
| | POLITICAL PARTY LEVICA | 6.568.069 |
| | Monetary donation from natural persons | 1.140 |
| | Donation in services or goods from natural persons | 92.250 |
| | Funds from the budget | 6.474.679 |
| | Coalition led by SDSM | 149.656.038 |
| | Donations to the main account from legal persons | 3.000 |
| | Donations to the main account from natural persons | 469.450 |
| | Monetary donation from natural persons | 511.000 |
| | Donation in services or goods from legal persons | 3.000 |
| | Donation in services or goods from natural persons | 23.000 |
| | PPA | 64.216.588 |
| | Funds from the budget | 84.430.000 |
| | INDEPENDENT CANDIDATES SUPPORTED BY A GROUP OF VOTERS | 4.390.479 |
| | Independent candidates supported by a group of voters | 4.390.479 |
| | Monetary donation from legal persons | 2.397.500 |
| | Monetary donation from natural persons | 1.658.727 |
| | Donation in services or goods from legal persons | 19.585 |
| | Donation in services or goods from natural persons | 39.340 |
| | PPA | 275.327 |

Table 2 Total amount of income by participant position and source of funding

| PARTICIPANT TYPE | Participant / income type | Amount of income |
|---------------------------------|---|--------------------|
| NON-PARLIMENTARY PARTIES | | 292.963.502 |
| | VMRO – People's Party | 609.990 |
| | PPA | 9.990 |
| | Funds from the budget | 600.000 |
| | Democratic Party of the Turks | 520.000 |
| | Monetary donation from legal persons | 20.000 |
| | Monetary donation from natural persons | 500.000 |
| | United Macedonia | 2.545.100 |
| | Donations to the main account from legal persons | 2.500.000 |
| | PPA | 45.100 |
| | MAAK Sopsishte | 156.750 |
| | Donations to the main account from legal persons | 140.000 |
| | Monetary donation from natural persons | 16.750 |
| | PARTY / DEMOCRATIC PARTY OF THE ROMA | 899.000 |
| | Funds from the budget | 899.000 |
| | Party of Pensioners | 142.807 |
| | Donations to the main account from legal persons | 120.807 |
| | Monetary donation from natural persons | 22.000 |
| | Political Party "GRagjanska INicijativa" – GRIN | 29.160 |
| | PPA | 29.160 |
| | POLITICAL PARTY MOVEMENT FOR THE NATIONAL UNITY OF THE TURKS | 1.228.000 |
| | Donations to the main account from legal persons | 1.228.000 |
| | Political Party DEMOCRATI Skopje | 703.516 |
| | Donations to the main account from legal persons | 536.951 |
| | Donation in services or goods from legal persons | 166.565 |
| | Political Party Desnica | 89.675 |
| | Monetary donation from natural persons | 89.675 |
| | Political Party RODINA MAKEDONIJA Local Elections 2025 | 354.347 |
| | PPA | 46.847 |
| | Funds from the budget | 307.500 |

Table 2 Total amount of income by participant position and source of funding

| PARTICIPANT TYPE | Participant / income type | Amount of income |
|---------------------------------|--|--------------------|
| NON-PARLIMENTARY PARTIES | | 292.963.502 |
| | Political Party TMRO | 1.232.269 |
| | PPA | 52.269 |
| | Funds from the budget | 1.180.000 |
| WORKERS' PARTY | | 177.631 |
| | PPA | 177.631 |
| | Serbian Party | 42.000 |
| | Monetary donation from natural persons | 22.000 |
| | Funds from the budget | 20.000 |
| | Your Party Skopje – Election Campaign for the 2025 Local Elections | 4.132.231 |
| | Donations to the main account from legal persons | 3.000.000 |
| | PPA | 1.132.231 |

Source: SCPC administrative data from overall financial statements

4.1.2. Revenue for paid political advertising (PPA)

Paid political advertising (PPA) constitutes a specific mechanism for financing the media presentation of participants in the election campaign, whereby the funds are provided from the state budget, while their allocation, method of use, and control are regulated by the Electoral Code (Article 76-d). The essential characteristic of this system is that the budget funds for PPA are not paid to the participants themselves, but are disbursed through the budget account of the State Election Commission (SEC), directly to the media outlets, on the basis of submitted invoices and other supporting documentation. In the financial reports of the participants, these funds are usually recorded both as revenue and simultaneously as expenditure for PPA, thereby ensuring a public trail and verifiability of the amounts used for the media campaign.

The total amount of funds for PPA is limited by a statutory ceiling, expressed as an amount per registered voter, excluding VAT. In the context of local elections, pursuant to Article 76-d of the Electoral Code, this rule has an additional specific feature: if a second round is held in certain municipalities or in the City of Skopje, an additional framework for financing PPA for the second round is activated for those electoral units, again based on the number of registered voters in the territory where the second round is held. This means that, unlike parliamentary elections, where the electoral process is conducted in a single national round, in local elections the overall PPA framework may vary depending on whether a second round is held and on the number of municipalities in which it takes place.

With regard to the criteria for the allocation of budget funds for PPA, the law establishes a principle of allocation by written agreement, with clearly defined upper thresholds by category of participant. In essence, the funds are distributed in such a way that the dominant share is reserved for the two largest ruling parties or entities and the two largest opposition parties, amounting in total to up to 90% of the funds, while the remaining share is intended for parliamentary parties that do not form a parliamentary group, as well as for non-parliamentary parties and candidates.

The criteria thus established for the allocation of budget funds for PPA do not ensure a clear and proportionate distribution of budget funds for paid political advertising, because they do not provide for the allocation of funds to parliamentary parties that have formed a parliamentary group in the Assembly but are not among the two largest ruling or opposition parties. Such a normative arrangement creates an unequal position among parliamentary entities and presents a risk of undermining the principle of equality and fair electoral competition.

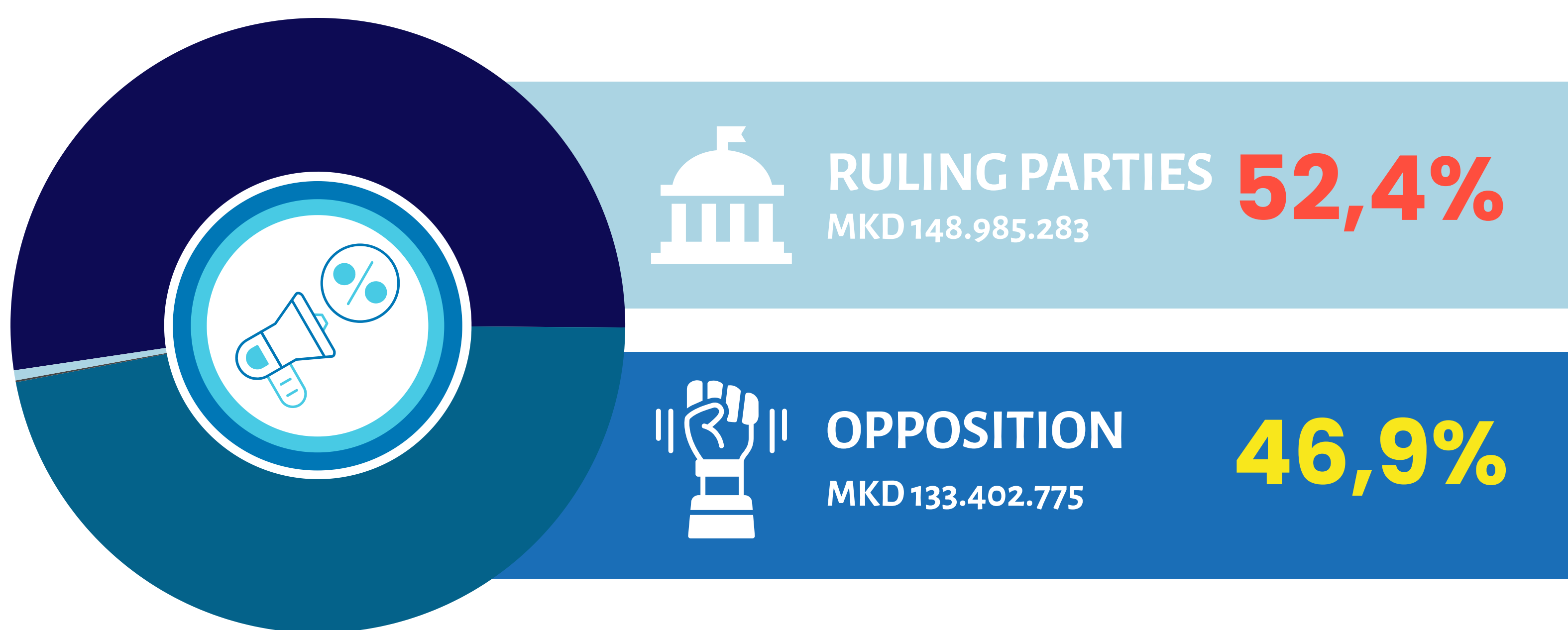
In relation to this established allocation of budget funds for PPA, the State Commission for Prevention of Corruption (SCPC) carried out an anti-corruption review of the provisions of Articles 75 to 76-d of the Electoral Code and prepared a Report on the Anti-Corruption Review of the Provisions of the Electoral Code, Chapter VI Election Campaign, under the subheading “Media Presentation”, from Article 75 to Article 76-d, which is annexed to this report (Annex No. II).

Total Volume and Distribution of PPA in the 2025 Local Elections

According to the data presented in the financial reports submitted to the State Commission for Prevention of Corruption (SCPC), the total amount of reported revenues for paid political advertising (PPA) amounted to **MKD 283,852,126**.

Participants belonging to the **ruling parties** reported **MKD 149 million**, while participants belonging to the **opposition** reported **MKD 133.4 million**. The remaining share was concentrated among **non-parliamentary entities**, with a total of **MKD 1.5 million**. This structure confirms that PPA, as a budgetary measure, is in practice used almost entirely by entities with the highest political capacity and national visibility, while the participation of non-parliamentary entities and civic initiatives remains marginal.

Chart 4 PPA revenues by participant position



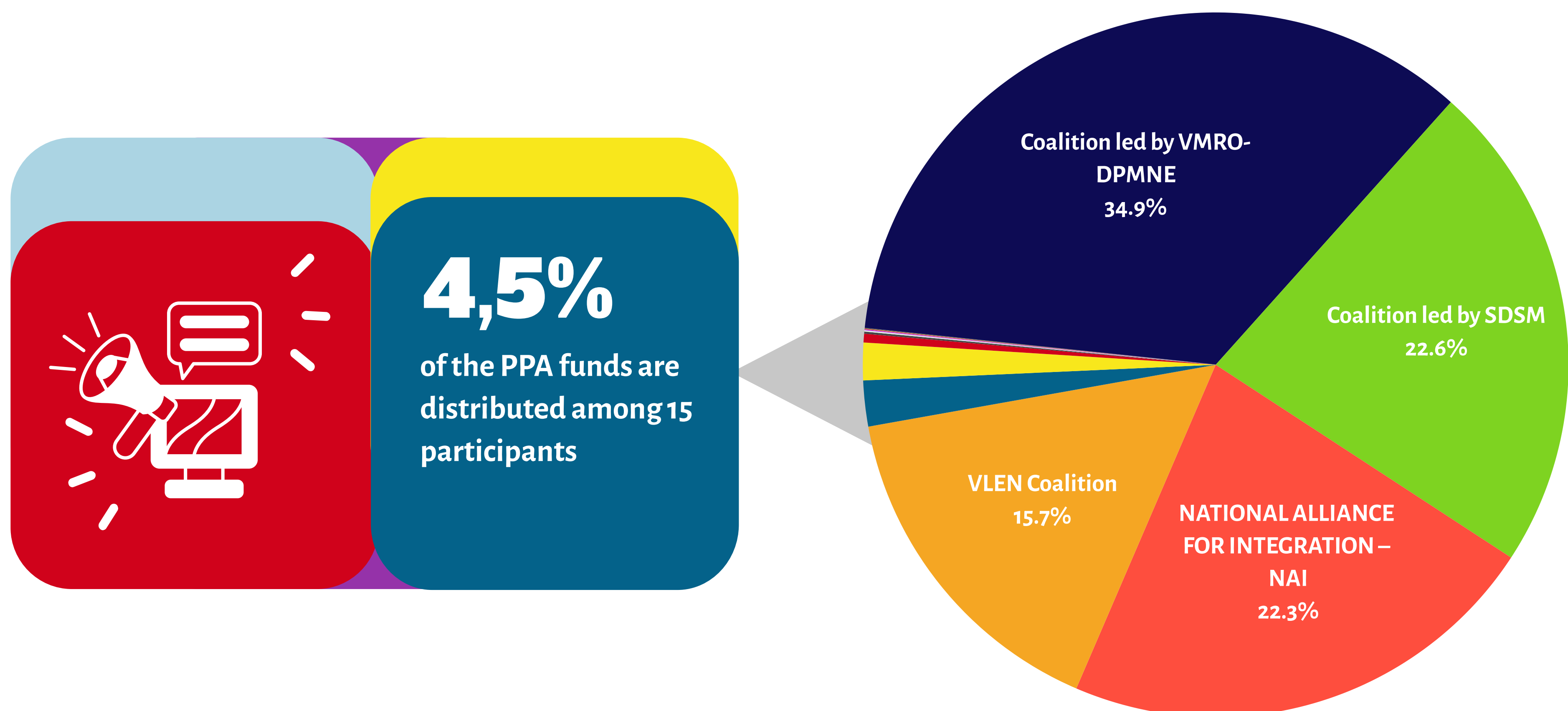
Source: SCPC administrative data from overall financial statements

Distribution by Participant and Concentration of Funds

According to the data presented in the financial reports submitted to the State Commission for Prevention of Corruption (SCPC), the distribution by individual participant shows that four entities dominate the use of paid political advertising (PPA), namely: the coalitions led by **VMRO-DPMNE (MKD 99,297,173)**, the coalitions led by **SDSM (MKD 64,216,588)**, the **NAI Coalition – National Alliance for Integration (MKD 63,238,506)**, and the **VLEN Coalition (MKD 44,694,646)**. These four participants alone reported **MKD 271,446,913**, while all other participants together reported **MKD 12,709,700**. The remaining funds are distributed among several entities with significantly smaller amounts. **LDP (MKD 5,947,681)** and the **Democratic Party of the Serbs in Macedonia – Bratska (MKD 4,899,486)** are the only two “smaller” beneficiaries

reporting amounts exceeding MKD 1 million. Among the non-parliamentary entities, the highest amount was reported by **Your Party Skopje (MKD 1,132,231)**, while the other non-parliamentary parties reported only symbolic amounts, ranging from several thousand to several hundred thousand denars. This indicates that their participation in the media space through PPA is, in essence, limited.

Chart 4 PPA revenues by participant position



Source: SCPC administrative data from overall financial statements

These relationships are of fundamental importance for interpreting the system. Although PPA is formally intended as a measure to ensure media visibility and to reduce pressure from private financing for advertising campaigns, the actual distribution shows that its main effect is concentrated among a few of the largest political entities. In practice, PPA strengthens media capacity precisely where there is already a high level of organisational infrastructure and political recognition.

Specific Features of Local Elections and Implications for the Analysis

In local elections, an additional analytical challenge arises from the fact that participants, especially coalitions and larger parties, often open and use multiple transaction accounts corresponding to coalition formats and the organisation of the campaign across municipalities. As a result, the number of accounts and the fragmentation of transactions may vary significantly from one participant to another, which requires careful aggregation of the data in order to obtain a realistic picture of the total volume of paid political advertising (PPA) by coalition leader or by political entity. This is particularly relevant when comparing the leaders of the largest coalitions, as their total PPA amounts may result from the aggregation of several municipal or coalition accounts, rather than from a single account at the central level.

At the system level, PPA remains the most important budgetary instrument directly shaping the media presence of campaign participants. The allocation of funds established under Article 76-d of the Electoral Code and the processed data from the 2025 Local Elections show the following:

- (1) an almost even division between parties in power and parties in opposition,
- (2) an exceptionally high concentration of funds among four entities, and
- (3) a low level of funds allocated to non-parliamentary entities and groups of voters.

4.2. Expenses

Election campaign expenditures encompass all advertising-related means used during the election campaign for the purpose of promoting the programme and ideas of the participant in the elections. Pursuant to Article 84 of the Electoral Code, an election participant may spend a maximum of MKD 110 per registered voter in the electoral district or municipality for which it has submitted a list of candidates, for all rounds of the elections. In the submitted financial reports, participants reported total expenditures in the amount of MKD 311,397,462.

In the processing of data from the final reports and for the purposes of expenditure analysis, coalition appearances are recorded and analysed in accordance with the coalition leader, in order to ensure a consistent and legally precise approach in the interpretation of the data. Although, in the financial documentation and banking records, coalitions appear through several separate accounts, in the text they are treated as an aggregated entity according to the coalition leader. In this respect, the coalition “Your Macedonia”, led by VMRO-DPMNE, appears through a total of eleven (11) recorded accounts, while the coalition led by SDSM appears through four (4), whereas the other coalitions participated with a single election account. This approach enables analytically more consistent comparability of revenues and expenditures, without losing sight of the fact that these are multiple local accounts of the same coalition leader.

In addition, due to the pronounced fragmentation of data relating to the independent lists, that is, groups of voters, the large number of participants, and the predominantly small individual amounts of donations and expenditures, they will be presented in the narrative section as one aggregated total, except in cases where a particular participant stands out due to a higher amount or a specific expenditure structure relevant to the analysis.

The data obtained through the processing of the submitted comprehensive financial reports show a high concentration of expenditures among a limited number of participants. The three largest participants account for 81.7% of the total reported expenditures. The table presents the structure of expenditures incurred through the accounts of participants in the election campaign.

Table 3 Total expenditures by type of expenditure

| Expense type | Amount paid | Participation |
|---|--------------------|---------------|
| Advertising and propaganda expenses | 237.797.200 | 76,4 % |
| Expenses for holding election rallies | 25.030.083 | 8,0 % |
| Intellectual services | 18.906.499 | 6,1 % |
| Transport services | 13.384.339 | 4,3 % |
| Representation expenses | 5.372.576 | 1,7 % |
| Renting space during an election campaign | 4.359.759 | 1,4 % |
| Other expenses | 3.353.926 | 1,1 % |
| Statistical research services | 3.193.080 | 1,0 % |
| TOTAL | 301.346.776 | 100 % |

Source: SCPC administrative data from overall financial statements

The structure of expenditures clearly shows that the largest share of funds was directed towards advertising and promotional activities, amounting to MKD 237,797,200, or 76.4% of all reported expenditures. This category includes costs related to the promotion, production, and distribution of promotional materials, creative and marketing services, as well as other promotional services that support the public visibility of candidates and lists of councillors.

The second most significant category is expenditure on the organisation of pre-election rallies, amounting to MKD 25,030,083 (8.0%). These costs are most commonly associated with the organisation of public events and field activities, rally logistics, technical support, sound system services, security, and similar organisational needs.

The third largest category is intellectual services, amounting to MKD 18,906,499 (6.1%). This group typically includes expert services, consultancy engagements, communication and public relations services, public opinion research, and analytical support for the campaign.

Transport and logistics account for MKD 13,384,339 (4.3%), most commonly related to transport services, logistics for field activities, and operational support. Representation and hospitality expenses were reported at MKD 5,372,576 (1.7%), indicating a certain level of use of catering and protocol-related services, most often in the context of events, meetings, and field organisation.

The rental of premises during the campaign amounted to MKD 4,359,759 (1.4%) and is related to the functioning of campaign headquarters, local offices, and other logistical points that are typical of local elections due to the need for participants to maintain a presence in several municipalities simultaneously. Other categories, such as printing and publishing (MKD 762,461), materials and minor expenses (MKD 607,485), and financial costs and charges (MKD 224,099), account for only a small share and represent administrative and operational expenditures.

The distribution of expenditures by type of participant shows a pronounced dominance of coalitions. Coalitions reported MKD 280,323,653, accounting for 90% of total expenditures. Political parties reported MKD 25,734,671 (8.3%), while groups of voters reported MKD 5,339,138 (1.7%).

Table 4 Total expenditures by participant type

| Participant Type | Amount Paid | Participation |
|--|--------------------|-----------------|
| Coalition | 280.323.653 | 90,0 % |
| Party | 25.734.671 | 8,3 % |
| Independent Candidates Supported by a Group of Voters | 5.339.138 | 1,7 % |
| TOTAL | 311.397.462 | 100.00 % |

Source: SCPC administrative data from overall financial statements

In terms of political position, participants belonging to the opposition reported close to MKD 160 million (53%), while participants belonging to the ruling parties reported more than MKD 128 million (42.5%). Non-parliamentary participants reported MKD 21 million (7.1%), while groups of voters reported MKD 4.5 million (1.5%).

From the perspective of individual participants, the highest expenditures were recorded for the coalition led by VMRO-DPMNE, with a total of MKD 121,108,544 (40.2% of total expenditures). The second highest level of expenditure was recorded for the coalition led by SDSM, with a total of MKD 85,172,170 (28.3% of total expenditures). The National Alliance for Integration (NAI) Coalition reported expenditures in a total amount of MKD 55,908,775 (18.5% of total expenditures).

Table 5 Total expenditures per participant and type of expenditure

| Participant | Expenditure on advertising and promotion | Expenditure on the organisation of pre-election rallies | Intellectual services | Transport services | Representation expenses | Rental of premises during the election campaign | Statistical research services | Other expenditures | TOTAL |
|---|--|---|-----------------------|--------------------|-------------------------|---|-------------------------------|--------------------|-------------------|
| VMRO - People's Party | 268.364 | | 35.625 | | 58.187 | | | 20.379 | 6.717.964 |
| Movement ZNAM FOR OUR MACEDONIA | 10.046.270 | | | | | | | 66.053 | 428.229 |
| Democratic Party of the Serbs in Macedonia – Bratska | | | | | 69.206 | | | 786.314 | 5.339.138 |
| Democratic Party of the Turks in Macedonia | 481.885 | | | | | | | 4.416 | 10.050.686 |
| DEMOCRATIC ALLIANCE | | | | | | | | 41.229 | 110.435 |
| United Macedonia | 1.760.482 | | 32.222 | | | | | 2.289 | 484.174 |
| VLEN Coalition | 5.667.648 | | | 18.237 | | 1.011.700 | | 119.124 | 119.124 |
| Coalition led by VMRO-DPMNE | 95.666.343 | 8.100.366 | 10.454.184 | 6.375.000 | | 31.230 | | 396.307 | 2.189.011 |
| Coalition led by LDP | 7.297.837 | | 4.100.000 | | 7.922 | | | 10.441 | 11.416.200 |
| Coalition led by SDSM | 70.523.022 | 8.014.587 | 1.463.736 | 1.048.213 | 197.600 | 3.184.719 | | 9.149 | 154.241 |
| MAAK Sopishte | 136.596 | | | | | 8.496 | | | 17.582 |
| MACEDONIAN CONCEPT | | | | | 17.582 | | 3.193.080 | 355.644 | 55.908.775 |
| NATIONAL ALLIANCE FOR INTEGRATION – NAI | 34.461.991 | 8.915.130 | | 5.563.880 | 3.419.050 | | | 12.619 | 899.000 |
| PARTY / DEMOCRATIC PARTY OF THE ROMA | 877.741 | | | | 8.640 | | | 32.044 | 142.807 |
| Party of Pensioners | 52.763 | | | 56.000 | | 2.000 | | 21.617 | 1.228.000 |
| POLITICAL PARTY MOVEMENT FOR THE NATIONAL UNITY OF THE TURKS | 1.010.698 | | | 195.685 | | | | 32.073 | 703.516 |
| Political Party DEMOCRATS Skopje | 451.363 | | 185.699 | 25.230 | 9.151 | | | 130 | 89.675 |
| Political Party Desnica | 89.545 | | | | | | | 3.764 | 6.475.819 |
| POLITICAL PARTY LEVICA | 4.903.363 | | 1.418.796 | 102.094 | | 47.802 | | 31.015 | 112.789 |

Source: SCPC administrative data from overall financial statements

Table 5 Total expenditures per participant and type of expenditure

| Participant | Expenditure on advertising and promotion | Expenditure on the organisation of pre-election rallies | Intellectual services | Transport services | Representation expenses | Rental of premises during the election campaign | Statistical research services | Other expenditures | TOTAL |
|--|--|---|-----------------------|--------------------|-------------------------|---|-------------------------------|--------------------|--------------------|
| Political Party RODINA MAKEDONIJA Local Elections 2025 | 81.774 | | | | | | | 102.736 | 1.230.553 |
| Political Party TMRO | 712.201 | | 362.224 | | 40.205 | 13.187 | | 740.293 | 85.172.170 |
| Serbian Party in Macedonia for the 2025 Local Elections | 21.070 | | | | | | | 14.160 | 35.230 |
| Your Party Skopje – Election Campaign for the 2025 Local Elections | 309.256 | | 822.975 | | 60.860 | | | 70.709 | 1.263.800 |
| Independent candidates supported by a group of voters | 2.976.988 | | 31.038 | | 1.484.173 | 60.625 | | 481.421 | 121.108.544 |
| TOTAL | 237.797.200 | 25.030.083 | 18.906.499 | 13.384.339 | 5.372.576 | 4.359.759 | 3.193.080 | 3.353.926 | 311.397.462 |

Source: SCPC administrative data from overall financial statements

In addition to these three participants, which together account for around 87.0% of total expenditures, there are other participants with significantly lower expenditure levels. The coalition led by LDP recorded total expenditures in the amount of MKD 11,416,200 (3.8%), with the largest sums spent on advertising (MKD 7,297,837) and intellectual services (MKD 4,100,000). In its final financial report, the political party “Movement ZNAM – For Our Macedonia” recorded expenditures amounting to MKD 10,050,686, largely allocated to advertising, promotion, and the printing of promotional materials. The VLEN Coalition recorded total expenditures in the amount of MKD 6,717,964 (2.2%), mainly for advertising (MKD 5,667,648) and the rental of premises (MKD 1,011,700). The political party Levica recorded total expenditures amounting to MKD 6,475,819 (2.1%), with advertising (MKD 4,903,363) and intellectual services (MKD 1,418,796) as the main expenditure items. Groups of voters, with MKD 5,339,138 (1.8%), recorded a different expenditure structure, with a higher share of “representation expenses” (MKD 1,484,173) alongside advertising (MKD 2,976,988).

4.2.1. Expenditures for Paid Political Advertising

Paid political advertising (PPA) represents a specific segment of election campaign expenditure, as it is linked to funds provided from the budget and intended exclusively for the media presentation of participants through broadcasters, print media, and electronic media (internet portals).

This section provides an analysis of PPA expenditure for the 2025 local elections, based on the data from the final reports submitted to the State Commission for Prevention of Corruption (SCPC) by participants in the electoral process, presented by participant, and additionally by political status (ruling parties/opposition), as well as by type of participation (party/coalition/independent candidates supported by a group of voters/non-parliamentary entities). In the interpretation, account has also been taken of the practice in local elections whereby campaigns are conducted through multiple transaction accounts and multiple contracts across municipalities.

Pursuant to the Electoral Code, there are two key limitations relevant to this analysis: first, the maximum amount that one participant may pay to a single electronic medium (internet portal) or print medium may not exceed EUR 15,000 in denar equivalent, excluding VAT; and second, the total amount for paid media presentation across all electronic and print media may not exceed 25% of the allocated financial resources for this purpose.

According to the data from the submitted financial reports, the total realised expenditures for PPA by participants in the 2025 Local Elections amount to MKD 284,156,613. The distribution of funds is almost evenly divided: participants belonging to the ruling parties realised MKD 148,985,283, while participants from the opposition realised MKD 133,402,775. The remaining part relates to non-parliamentary entities with MKD 1,493,228. All of these data show that the media campaign relies entirely on budgetary funds.

The structure of expenditures by type of media for the 2025 Local Elections shows a clear dominance of television. For paid political advertising on television, MKD 170,591,902 was disbursed (64.3% of total PPA), MKD 67,553,959 for internet portals (25.5%), MKD 22,230,744 for broadcasters (8.4%), and MKD 4,988,741 for print media (1.9%).

At the participant level, four political entities used 95.5% of the total amount allocated for PPA: the coalition led by VMRO-DPMNE with MKD 99,297,176, the coalition led by SDSM with MKD 64,216,588, the NAI Coalition with MKD 63,238,506, and the VLEN Coalition with MKD 44,694,646.

The SCPC obtained data on the paid PPA expenditures from the State Election Commission, which established that the total amount of funds disbursed for PPA for all 166 participants in the electoral process amounted to MKD 294,075,396.

Chart 4 PPA Revenues by Participant Position

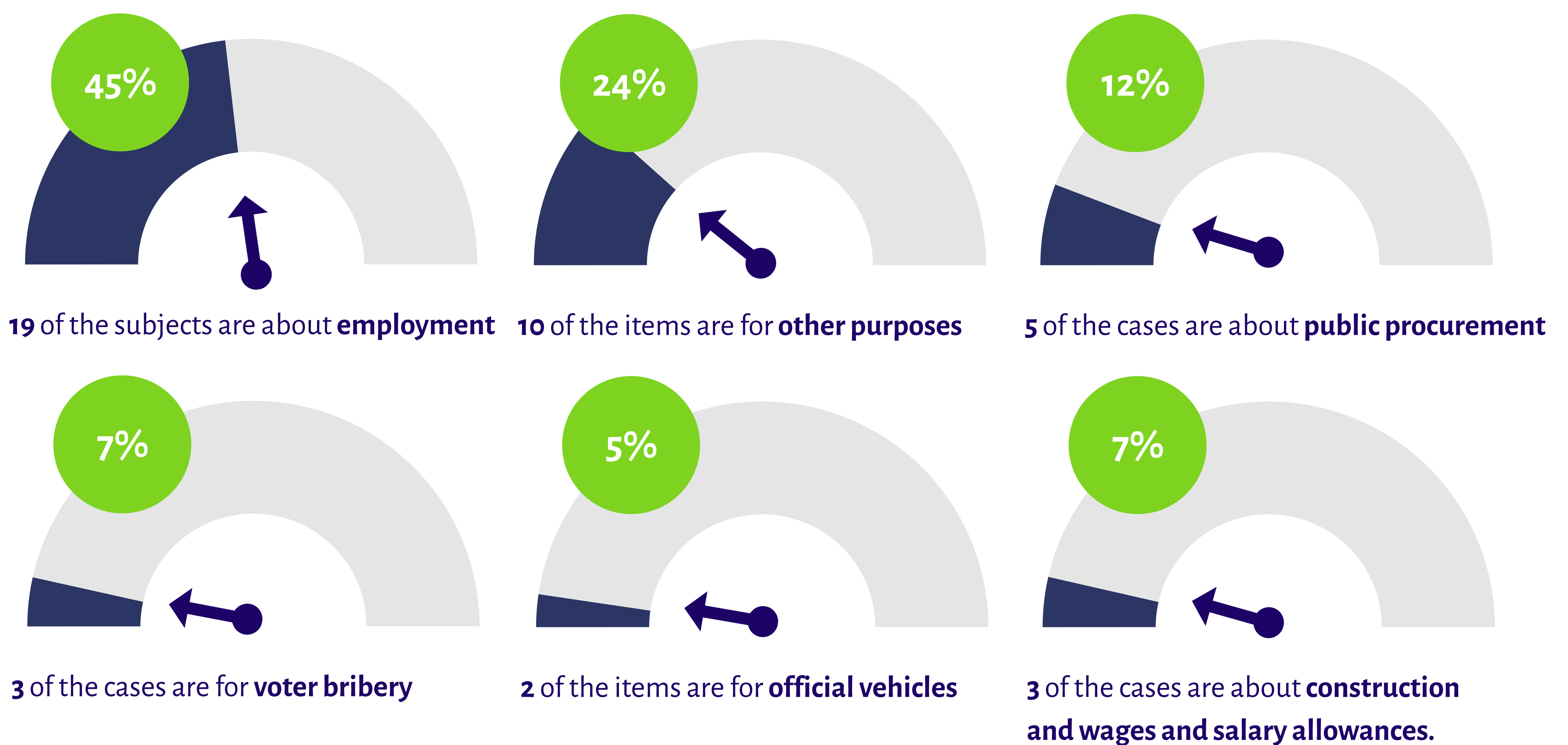


Source: SCPC administrative data from overall financial statements

5. DECISIONS WITHIN THE COMPETENCE OF THE SCPC

During the electoral process, the State Commission for Prevention of Corruption (SCPC) opened a total of 43 (forty-three) cases, arising from reports of suspected violations of the Electoral Code and the Law on the Prevention of Corruption and Conflict of Interest, as well as cases initiated by the Commission on its own initiative.

Chart 7 Number of cases received by basis



Source: SCPC administrative data

5.1. Cases by application

A total of 42 (forty-two) reports alleging violations of the Electoral Code and the Law on the Prevention of Corruption and Conflict of Interest were submitted to the State Commission for Prevention of Corruption (SCPC) during the electoral period. The SCPC acted upon a total of 38 (thirty-eight) cases, of which in 33 (thirty-three) cases it adopted a decision to discontinue the proceedings, while in 3 (three) cases it adopted a decision dismissing the report. In one case, it adopted a conclusion to merge the case with another case containing the same or similar allegations, and in one case it adopted a conclusion for reassignment and further action in accordance with the Law on Whistleblower Protection. Following an analysis of the content of the submitted reports, the following was established:

- The largest number of reports, namely a total of 19 (nineteen), relate to allegations of irregularities in employment procedures or termination of employment during the electoral period, covered by Article 8-a, paragraph 1, indent 3 of the Electoral Code, and Article 34, paragraph 1, indent 3 of the Law on the Prevention of Corruption and Conflict of Interest. For the purpose of verifying the allegations and establishing the factual situation, the SCPC submitted requests for action to the competent inspection services, as well as to the entities covered by the reports. On the basis of the relevant data and information obtained and the established factual situation, the SCPC adopted decisions within its competence in respect of 16 (sixteen) of the said 19 (nineteen) submitted reports alleging irregularities in employment or termination of employment during the electoral period, while one case was merged with another by conclusion.

- The allegations in 5 (five) reports concern violations of Article 8-a, paragraph 2, indent 1 of the Electoral Code, a provision relating to the prohibition on holding public events marking the commencement of construction works or the opening of facilities financed from the budget, public funds, public enterprises, or other legal entities managing state capital. In relation to these reports, the SCPC established that some of the events in question had not taken place during the electoral period, that is, the events had been held before the beginning of the elections, while for some of them it was established that no violation of Article 8-a, paragraph 2, indent 1 of the Electoral Code had been committed. To date, the SCPC has adopted decisions in 4 (four) of the 5 (five) cases opened on this basis, while proceedings in one case are still ongoing.
- In 3 (three) cases, the SCPC established that the reports concerned allegations of voter bribery, regulated under Article 8-b, paragraph 6 of the Electoral Code. It therefore undertook activities in accordance with Article 37 of the Law on the Prevention of Corruption and Conflict of Interest and submitted a Notice on the Reported Case to the competent temporary commission within the Public Prosecutor's Office responsible for monitoring possible electoral irregularities, for action within its competence.
- Two (2) reports contained allegations of violations of Article 8-a, paragraph 1, indent 1 of the Electoral Code, and Article 34, paragraph 1, indent 1 of the Law on the Prevention of Corruption and Conflict of Interest, relating to road construction and construction works in two different municipalities, in respect of which the SCPC adopted decisions at a public session.
- Two (2) reports alleging a violation of Article 8-b, paragraph 1 of the Electoral Code were submitted to the SCPC, concerning the misuse of official vehicles for party activities during the campaign. In one of these two cases a decision was adopted, while in the other proceedings are being conducted in accordance with the Law on Whistleblower Protection.
- A report was also submitted alleging a violation of Article 8-a, paragraph 1, indent 2 of the Electoral Code, and Article 34, paragraph 1, indent 2 of the Law on the Prevention of Corruption and Conflict of Interest, claiming that a decision had been adopted creating conditions for the increase of salaries and salary compensation for part of the municipal administration, in respect of which the SCPC adopted a decision within its competence.
- The remaining 10 (ten) reports contained allegations of irregularities that are not covered by the Electoral Code, or in respect of which the SCPC established that it has no competence to act, and decisions were adopted within the SCPC's competence accordingly.

In the course of acting upon the submitted reports, in one case the SCPC established a violation of Article 36, paragraph 1 of the Law on the Prevention of Corruption and Conflict of Interest and Article 8-b of the Electoral Code, due to a suspicion of abuse of official position by the director of a public enterprise who had enabled the use of buses owned by the enterprise for political advertising, contrary to the cited legal provisions. As a result of this finding, the SCPC submitted an Initiative for Criminal Prosecution to the Public Prosecutor's Office of the Republic of North Macedonia against the director of the public enterprise.

5.2. Cases on own initiative

The SCPC has opened 1 (one) case on its own initiative, following a report from the media, and the proceedings are ongoing.

6. FINANCIAL REPORTING

Financial reporting in the electoral process is regulated by Articles 84-b and 85 of the Electoral Code and constitutes an essential mechanism for ensuring transparency, accountability, and legality in the collection and use of funds for the election campaign. Within the system of election campaign financing, financial reports are not merely a formal obligation, but also a key instrument of public oversight and institutional control, through which the sources of funds, the dynamics of inflows and outflows, compliance with permitted limits, as well as the timeliness and completeness of reporting are monitored.

In local elections, financial reporting acquires additional complexity due to the structure of the electoral process. First, the election campaign is conducted in two rounds, which implies several critical reporting moments and additional deadlines for the submission of data. Second, in local elections there is a different organisational arrangement among participants, particularly in the case of coalitions and political parties participating with different candidacies and lists at municipal level, which in practice results in the opening of multiple transaction accounts for the election campaign. Third, there is a significant presence of independent candidates supported by groups of voters, whose administrative and financial capacities are, by their nature, more limited, and this is reflected in the quality and timeliness of financial reporting.

Pursuant to the legal framework governing election campaign financing, participants in the election campaign are required to open a separate transaction account for the election campaign, through which all inflows and payments related to electoral activities are carried out. In addition, they are obliged to submit financial reports containing data on campaign revenues and expenditures within the prescribed deadlines. These reports are submitted to the competent institutions and are published in the manner regulated by the Electoral Code, thereby ensuring the publicity and verifiability of the data.

6.1. Deadlines and critical points in reporting on local elections

In the electoral process for the local elections, reporting is carried out in several phases corresponding to the dynamics of the campaign and to the two-round electoral model. Table (for example, Table 1) records the fulfilment of the obligations of campaign participants in relation to the following items: a report with a form on donations received in the transaction account for the election campaign on the 11th day of the campaign; a report with a form on donations received in the transaction account for the election campaign one day before the holding of the second round; a report with a form on donations received in the transaction account for the period from one day after the end of the campaign until the closure of the transaction account; a comprehensive financial report with a specification of campaign revenues and expenditures; and a record of the status of account closure. In this model, the distinction between participants who conclude their campaign in the first round and those who proceed to the second round is crucial, since for the latter there is an additional reporting obligation prior to the holding of the second round of voting, as well as the need for continuous updating of financial data.

6.2. Supervisory role and activities of the SCPC

Within the scope of its competences, the State Commission for Prevention of Corruption (SCPC) monitors the fulfilment of financial reporting obligations, including the timeliness of the submission of reports, their completeness, and their

compliance with the legal provisions governing campaign financing. The Commission performs this function through the analysis of submitted reports, comparison of the data with bank statements, identification of inconsistencies, and determination of cases of non-submission or late submission of reports. Where shortcomings are established, the SCPC undertakes appropriate measures in accordance with its legal powers, including notifying the competent authorities and initiating proceedings where the conditions are met.

Due to legal gaps in the statutory framework, the SCPC faces limitations in its actions, as is the case with the absence of misdemeanour sanctions for the failure of participants in the electoral process to submit financial reports pursuant to Articles 84-b and 85 of the Electoral Code. This indicates the need for amendments to the law in order to enable more effective management of procedures and sanctions.

6.3. Findings from the table of submitted reports and closed accounts

According to the submitted records, a total of 166 transaction accounts of participants in the election campaign were identified in the electoral process. This number reflects the specific nature of local elections: a single political party or coalition may have several accounts corresponding to different coalition configurations or different local appearances, while, in addition, a significant share of the accounts are linked to groups of voters.

A particularly important segment is the status of closure of the transaction accounts. The closure of an account has a dual function: it formally closes the financial cycle of the campaign and enables a final verification of whether all obligations have been settled and whether any unused funds remain.

In the context of a two-round electoral process, an additional indicator of the participants' compliance is the submission of the report "one day before the second round" in those cases where a second round is held. Monitoring this column makes it possible to determine whether the participants who continued their campaign into the second round maintained continuous accountability and timely reporting. The data indicate that some participants with active accounts in the period between the two rounds failed to submit a report within the legally prescribed deadline, which is an indicator of a risk of reduced transparency precisely at the stage when the campaign continues and when, as a rule, activities intensify.

7. WEAKNESSES OF THE ELECTION CODE

The State Commission for Prevention of Corruption (SCPC) has established that there are significant shortcomings in the legal framework governing electoral processes, creating a need for its improvement, amendment, supplementation, and harmonisation. Despite certain amendments to the Electoral Code, there are still gaps and unregulated issues that seriously affect the work of the SCPC and the effective monitoring of the conduct of electoral processes.

The systemic weaknesses in the electoral process of the Republic of North Macedonia are the result of various aspects of the legal and institutional framework. These weaknesses reflect both deficiencies in the legal regulation and problems in the implementation and management of electoral processes. Key areas of concern include the lack of public debate, problems relating to transparency and the implementation of new regulations, limited resources and training for the electoral administration, as well as insufficient support for the institutions responsible for elections. These problems lead to unpredictability and uncertainty in the electoral process, which may affect its stability and effectiveness.

The electoral administration, including the State Commission for Prevention of Corruption, has limited human and financial resources, which may affect timely preparation and communication with other electoral bodies and with the public. These weaknesses underline the need to improve the legal and institutional framework governing the electoral process, with a view to ensuring greater stability, transparency, and efficiency of elections in the Republic of North Macedonia.

Key Weaknesses of the Electoral Code

The State Commission for Prevention of Corruption has identified the need to improve the legal framework governing issues in the field of electoral processes, through its amendment, supplementation, and harmonisation. The identified weaknesses are set out below:

- **Precision of the rules on financing:** There is a need to review and further specify the provisions of Article 83, paragraph 2, particularly in the part concerning the financing of the election campaign from the regular account of the political party and from donations. This refers to establishing individual and overall limits on funds financed or donated by natural and legal persons, in order to prevent excessive influence of private interests, while also limiting excessive financing of electoral activities through state funds that are intended for entirely different purposes.
- **Insufficiently regulated criteria for budget financing:** In circumstances where election campaigns are financed with budget funds, Article 76-d should be further regulated by prescribing measurable criteria for the allocation of funds from the Budget of the Republic of North Macedonia for paid political advertising, and by avoiding inconsistencies that have resulted in certain participants being deprived of the possibility of receiving funds for paid political advertising from the budget.
- **Established criteria for the allocation of budget funds for PPA that do not ensure clear and proportionate distribution:** The current rules do not provide for the allocation of funds to parliamentary parties that have formed a parliamentary group in the Assembly but are not among the two largest ruling or opposition parties.

- **Uncertainties regarding the connectedness of donors:** There is a need to regulate the manner in which donors will prove that they are not “connected persons” with broadcasters, print media, and electronic media when financing or donating to political parties. This is essential in order to avoid conflicts of interest and to ensure transparency in financing.
- **Imprecise provisions on surplus funds and outstanding liabilities:** The provisions of Article 85 should be revised so as to define a clear course of action where surplus funds are identified in the election campaign account, or where unpaid liabilities remain after the closure of the election accounts.
- **Support for independent candidates by coalitions and parties:** There is a need to regulate the conditions under which a coalition or political party may support an independent candidate and use funds for paid political advertising for the benefit of such a candidate, and to specify the conditions and manner of such support.
- **Monitoring of media presentation:** It is necessary to further regulate the Electoral Code in order to designate the competent body responsible for monitoring and reporting on the media presentation of internet portals during elections.
- **Application of interoperable systems:** Article 76-d, paragraph 11 should be supplemented through the establishment of an interoperable system for the exchange and control of data on banner activity, in which all relevant stakeholders would be included.
- **Regulation of participation in election campaigns through social networks:** There is a need to regulate the manner of organising, paying for, monitoring, and reporting to the competent authorities on internet presentation carried out by participants in the election campaign through social media.
- **Electronic media – conditions and criteria:** There is a need to further regulate the conditions and criteria that must be fulfilled by electronic media in order to be eligible to apply to the State Election Commission for political advertising.
- **Allocation of budget funds for paid political advertising:** Clear and precise criteria should be prescribed for the allocation of budget funds intended for paid political advertising in electronic media, including internet portals.
- **Deadlines for payment of donations:** The currently established final deadline for the payment of donations should be reconsidered, so as to ensure that donations are paid no later than the day on which the election campaign ends.
- **Further regulation of Article 84-b, paragraph 8:** Article 84-b, paragraph 8 should be further regulated in a manner that would enable the Ministry of Finance, through secondary legislation, to prescribe the method of keeping business records and preparing the financial report or financial reports for the election campaign, taking into account all types and sources of campaign financing, especially in cases where these do not always generate a monetary inflow to the transaction account. At the same time, fully digital reporting and monitoring by the participants and the competent authorities should be introduced.
- **Penal and misdemeanour provisions:** The Electoral Code should be further regulated so that, in the section on penalties and misdemeanour provisions, fines are also envisaged for electronic media, namely electronic portals, in cases of failure to submit a report on the advertising space used by each participant in the election campaign and the funds paid or claimed on that basis.
- **Training and support for financial reporting:** There is a need to designate a body that will conduct training related to financial reporting, in order to improve transparency and the timely informing of the public regarding election campaign financing.

These weaknesses indicate the need for serious improvements to the Electoral Code in order to ensure a fair, transparent, and effective regulatory framework that will enable the State Commission for Prevention of Corruption, as well as all relevant institutions, to exercise their competences effectively and contribute to the integrity of electoral processes in the Republic of North Macedonia.

8. CONCLUSION

Pursuant to Article 36, paragraph 3 of the Law on the Prevention of Corruption and Conflict of Interest, the State Commission for Prevention of Corruption (SCPC) prepared a Special Report on the findings regarding the financing of the election campaign for the election of mayors and members of municipal councils in the Republic of North Macedonia in 2025. This report provides a comprehensive overview of the financial aspects of the electoral process, with particular focus on revenues, expenditures, and the legal framework related to election campaign financing.

The report also provides a detailed analysis of the administrative procedures related to election campaign financing. It offers an in-depth examination of financial flows, identified systemic weaknesses, and proposed measures for improving the transparency and efficiency of electoral activities, as well as for strengthening the role of the State Commission for Prevention of Corruption in combating corruption through the effective handling of cases and the implementation of measures to enhance transparency and accountability towards citizens.

The Commission demonstrated efficiency and determination in addressing cases of irregularities related to the election campaign. This report points to specific cases that were processed, resulting in the imposition of appropriate sanctions and the taking of measures against the responsible persons.

Through its activities, the State Commission for Prevention of Corruption strengthened its role as an oversight body and significantly contributed to increasing trust in the electoral process. Each procedure was conducted transparently, thereby ensuring greater accountability and responsibility on the part of political actors. This highlights the progress made by the SCPC in fostering a fair and integrity-based electoral process by reducing the risks of corrupt activities.

The report covers the activities undertaken by the SCPC prior to the start of the election campaign, including preventive measures through the publication of notices on the legal restrictions concerning the spending of budget funds, with the aim of reducing unlawful activities during the electoral process. Furthermore, through the analysis of all requests for opinions, it was established that these were most frequently related to issues in the area of employment, promotion, disciplinary proceedings, commencement of construction works, disposal of property, and similar activities during the electoral period. It was also established that the most frequent applicants seeking opinions were ministries, municipalities, and state or public institutions, which points to the need for further clarification of the prohibitions laid down in Articles 8-a and 8-b of the Electoral Code and Article 34 of the Law on the Prevention of Corruption and Conflict of Interest during the electoral process, in order to avoid the risk of unlawful conduct and the unlawful use of budget funds. With regard to the legal obligation to submit data on the official motor vehicles available to institutions, we found a low level of compliance with this legal obligation, namely 42%, as well as the absence of a normative solution enabling sanctions by the SCPC, which reduces the possibility of preventing the misuse of official vehicles for the purposes of the election campaign. With a view to increasing transparency, the Commission publicly disclosed all institutions that failed to provide information within the statutory deadline.

Out of the total sources for financing the election campaign, amounting to MKD 595,017,106, 48% consisted of funds directly provided from the state budget for paid political advertising. For this reason, the SCPC points to the need to amend the legal framework with a view to reconsidering this method of financing election campaigns, due to the existence of corruption risks and the influence of political parties on the editorial policies of the media.

With regard to case handling during this electoral process, the SCPC opened a total of 43 cases, of which 42 were based on reports alleging violations of the Electoral Code and the Law on the Prevention of Corruption and Conflict of Interest during the electoral period, and 1 case was initiated ex officio following media reports.

The SCPC acted upon a total of 38 cases, of which in 33 cases it adopted a decision to discontinue the proceedings, while in 3 cases it adopted a decision dismissing the report. In one case, it adopted a conclusion to merge it with another case containing the same or similar allegations, and in one case it adopted a conclusion for reassignment and further action in accordance with the Law on Whistleblower Protection.

In the course of acting upon the submitted reports, in one case the SCPC established a violation of Article 36, paragraph 1 of the Law on the Prevention of Corruption and Conflict of Interest and Article 8-b of the Electoral Code, due to a suspicion of abuse of official position by the director of a public enterprise who enabled the use of buses owned by the enterprise for political advertising, contrary to the aforementioned legal provisions. As a result of this finding, the SCPC submitted an Initiative for Criminal Prosecution to the Public Prosecutor's Office of the Republic of North Macedonia against the director of the public enterprise.

With regard to the legal obligation to submit reports, we found that 54% of participants in the electoral process did not submit a comprehensive financial report, while a significantly small number of legal entities providing paid political advertising submitted reports to the SCPC. This undermines the principle of transparency of the election campaign and reduces trust in the electoral process as a whole, while no sanctions were imposed by the competent institutions.

The SCPC makes a significant contribution to safeguarding the legality, objectivity, and transparency of the electoral process through effective monitoring and control of financing, preventive activities, and the handling of reports of irregularities. There is a need to continue improving the mechanisms for addressing electoral irregularities and to encourage public awareness and participation in detecting corrupt activities, which is essential for maintaining democratic processes and citizens' trust in institutions.


The report details a large number of shortcomings in the legal and administrative framework regulating the electoral process and the financing of election campaigns in the Republic of North Macedonia. Despite the existence of a legal framework, significant implementation problems create a risk of corruption. This is particularly evident in the inadequate application of legal provisions, which leads to an increased risk of misuse of funds. Administrative procedures, such as the reporting of donations and expenditures by political parties, have been assessed as overly complex and inefficient, resulting in increased administrative costs and delays. Reform of these processes is needed in order to achieve greater efficiency and reduce opportunities for corruption.

The report points to the need to strengthen monitoring and oversight systems in order to ensure greater transparency and accountability in election campaign financing. Financial management remains a serious challenge, but the success of the SCPC in combating corruption and addressing irregularities is visible and significant, despite all the challenges.

The State Commission for Prevention of Corruption recommends the introduction of new mechanisms for monitoring revenues and expenditures, as well as the reorganisation of administrative processes in order to ensure more efficient resource management and reduce opportunities for corruption.

This report is an important document that provides a clear picture of the state of election campaign financing in North Macedonia in 2025. Through a detailed examination of revenues, expenditures, and the legal framework, the report underlines the need for reforms and improvements that will ensure a fair and transparent electoral process in the future.

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ANNEX 1: Status of submitted/not submitted reports by submission period

| Ordinal number | Participant Name | Bank Account | Day 11 | 1 day after the end of the first round | 1 day before the second round | 1 day after the account is closed | Total Report | Closed Account |
|----------------|--|-----------------|--------|--|-------------------------------|-----------------------------------|--------------|----------------|
| 1 | Coalition led by SOCIAL DEMOCRATIC UNION OF MACEDONIA - SDSM | 300000005356085 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 2 | Coalition led by SOCIAL DEMOCRATIC UNION OF MACEDONIA - SDSM | 300000005356182 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 3 | Coalition led by SOCIAL DEMOCRATIC UNION OF MACEDONIA - SDSM | 300000005356473 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 4 | Coalition led by SOCIAL DEMOCRATIC UNION OF MACEDONIA - SDSM | 300000005356570 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 5 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004296960021 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 6 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004296956820 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 7 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004296977287 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 8 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004296984077 | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| 9 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004296982040 | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| 10 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004297005514 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 11 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004296953134 | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| 12 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004297006096 | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| 13 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004296962058 | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| 14 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004296976705 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 15 | "YOUR MACEDONIA" coalition led by VMRO-DPMNE | 200004296957305 | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| 16 | NATIONAL ALLIANCE FOR INTEGRATION - NAI | 280101105786966 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 17 | Coalition for a Green Future | 300000005358704 | ✓ | ✓ | ✓ | ✗ | ✓ | no statements |
| 18 | EXPERIENCE FOR SUCCESS Coalition led by the Liberal Democratic Party | 300000005359286 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 19 | VLEN Coalition | 200004295561281 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 20 | POLITICAL PARTY LEVICA | 300000005350944 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

Source: SCPC administrative data from overall financial statements

ANNEX 1: Status of submitted/not submitted reports by submission period

| Ordinal number | Participant Name | Bank Account | Day 11 | 1 day after the end of the first round | 1 day before the second round | 1 day after the account is closed | Total Report | Closed Account |
|----------------|--|------------------|--------|--|-------------------------------|-----------------------------------|--------------|----------------|
| 21 | United Macedonia | 320100033698868 | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| 22 | Political Party TMRO | 280116103763036 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 23 | Political Party DEMOCRATS Skopje | 300000005352787 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 24 | Movement ZNAM For Our Macedonia | 300000005357249 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 25 | Macedonian Action – MAAK | 320100033707404 | ✗ | ✗ | ✗ | ✗ | ✓ | ✓ |
| 26 | Party of Pensioners | 300000005358316 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 27 | Democratic Party of the Turks in Macedonia | 300000005355406 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 28 | Political Party “GRagjanska INicijativa” – GRIN | 270078688550183 | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| 29 | VMRO People’s Party | 200004293435041 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 30 | POLITICAL PARTY MOVEMENT FOR THE NATIONAL UNITY OF THE TURKS | 270078644000120 | ✓ | ✗ | ✓ | ✗ | ✓ | ✓ |
| 31 | Bosniak Democratic Alliance | 270078687820161 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 32 | WORKERS’ PARTY | 300000005357540 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 33 | Macedonian Third Era / Macedonian Independent Lists – Sovereignists – MIRJANA MIRCHEVSKI | 270078656860186 | ✓ | ✓ | ✓ | ✗ | ✗ | ✓ |
| 34 | Party for the Movement of the Turks in Macedonia – PDT Skopje | 210078688980177 | ✓ | ✗ | ✓ | ✗ | ✓ | no statements |
| 35 | Your Party | 300000005356667 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 36 | MACEDONIAN CONCEPT | 30000 0005357928 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 37 | Party of United Democrats – PODEM | 200004296711507 | ✓ | ✓ | ✓ | ✓ | ✗ | ✓ |
| 38 | DEMOCRATIC ALLIANCE | 300000005356958 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 39 | RODINA MAKEDONIJA | 270078691770195 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 40 | PARTY / DEMOCRATIC FORCES OF THE ROMA | 300000005358510 | ✓ | ✗ | ✗ | ✗ | ✗ | ✓ |

Source: SCPC administrative data from overall financial statements

ANNEX 1: Status of submitted/not submitted reports by submission period

| Ordinal number | Participant Name | Bank Account | Day 11 | 1 day after the end of the first round | 1 day before the second round | 1 day after the account is closed | Total Report | Closed Account |
|----------------|--|-----------------|--------|--|-------------------------------|-----------------------------------|--------------|----------------|
| 41 | PARTY / ALLIANCE OF THE ROMA | 300000005357831 | ✗ | ✓ | ✗ | ✗ | ✗ | no statements |
| 42 | PARTY / UNION OF THE ROMA | 300000005351138 | ✗ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 43 | PARTY / DEMOCRATIC PARTY OF THE ROMA | 200004296710052 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 44 | Political Party Desnica | 210078704420152 | ✓ | ✓ | ✗ | ✓ | ✓ | no statements |
| 45 | Democratic Party of the Serbs in Macedonia – Bratska | 300000005352302 | ✓ | ✗ | ✓ | ✓ | ✗ | ✓ |
| 46 | POLITICAL PARTY “SERBIAN PARTY IN MACEDONIA” | 210078701240104 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 47 | POLITICAL PARTY DEMOCRATIC RENEWAL OF MACEDONIA | 300000005357637 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| 48 | Group of Voters Sashe Donev | 200004297437455 | ✓ | ✗ | ✗ | ✗ | ✓ | ✓ |
| 49 | Group of Voters Zoran Todorov | 300050000204364 | ✗ | ✗ | ✗ | ✗ | ✗ | no o balance |
| 50 | Group of Voters Venko Krstevski | 210078663480138 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 51 | Group of Voters Sane Jovanov | 300050000204655 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 52 | Group of Voters Vane Cekov | 290000002784630 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 53 | GROUP OF VOTERS – MIRAN MITREVSKI | 300320000044640 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 54 | GROUP OF VOTERS – SLOBODAN VELINOVSKI | 300320000044834 | ✓ | ✓ | ✓ | ✗ | ✓ | no statements |
| 55 | Group of Voters Gordan Stoshevikj | 270078674500121 | ✗ | ✗ | ✗ | ✗ | ✓ | no statements |
| 56 | Group of Voters Raman Demirov | 320100033708762 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 57 | Group of Voters Enis Demirov | 250000802743496 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 58 | Group of Voters Blagica Sabovljevikj Stoimenova | 200004296939554 | ✗ | ✓ | ✗ | ✗ | ✗ | ✓ |
| 59 | Group of Voters Vlatko Zdravkov | 300050000204461 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 60 | Group of Independent Voters Akji Akiov | 250000802744854 | ✗ | ✗ | ✗ | ✓ | ✓ | ✓ |

Source: SCPC administrative data from overall financial statements

ANNEX 1: Status of submitted/not submitted reports by submission period

| Ordinal number | Participant Name | Bank Account | Day 11 | 1 day after the end of the first round | 1 day before the second round | 1 day after the account is closed | Total Report | Closed Account |
|----------------|--|-----------------|--------|--|-------------------------------|-----------------------------------|--------------|----------------|
| 61 | Group of Voters Grozde Mitrov | 200004295552357 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 62 | Group of Voters Jovica Stoimenov | 200004296712089 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 63 | GROUP OF VOTERS – JAVORKA SOKOLOVSKA | 300320000044737 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 64 | GROUP OF VOTERS – ZLATE ALEKSOVSKI | 300320000044931 | ✓ | ✓ | ✗ | ✓ | ✓ | no statements |
| 65 | Group of Voters Suzana Jovanovska-Ilieva | 240310121271596 | ✓ | ✓ | ✗ | ✓ | ✓ | no statements |
| 66 | Group of Voters Aleksandar Gligorov | 210078662590163 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 67 | Group of Voters Slobodan Danevski | 30018000025344 | ✓ | ✗ | ✗ | ✗ | ✓ | no statements |
| 68 | Group of Voters – GABRIELA ILIEVSKA | 210078653410180 | ✓ | ✓ | ✓ | ✗ | ✗ | ✓ |
| 69 | Group of Voters – VASKO DELOVSKI | 210078672630148 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 70 | Group of Voters – ZORAN NIKOLOVSKI | 270078670850108 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 71 | GROUP OF VOTERS – RAMADAN IMERI | 300170000051195 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 72 | GROUP OF VOTERS DIMCHE ANDRESKI | 280111104138790 | ✗ | ✗ | ✗ | ✗ | ✓ | ✓ |
| 73 | GROUP OF VOTERS – INDEPENDENT CANDIDATE FOR MAYOR OF THE MUNICIPALITY OF DEBRCA, ZORAN NOGACHESKI – 2025 LOCAL ELECTIONS, DEBRCA | 28111104140148 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 74 | Group of Voters DRAGAN SHULEVSKI | 500000001548244 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 75 | Group of Voters Marjanche Stojanovski | 210078682430155 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 76 | Group of Voters Oliver Ivanovski | 300290000002592 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 77 | GROUP OF VOTERS ABDULA BAJRAMOSKI | 210078685960179 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 78 | Group of Voters Milosim Vojneski | 300280000054633 | ✓ | ✗ | ✓ | ✓ | ✓ | no statements |
| 79 | Group of Voters – Lupcho Stojanovski | 270078671230154 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 80 | Group of Voters – Goran Talevski | 200004296328357 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |

Source: SCPC administrative data from overall financial statements

ANNEX 1: Status of submitted/not submitted reports by submission period

| Ordinal number | Participant Name | Bank Account | Day 11 | 1 day after the end of the first round | 1 day before the second round | 1 day after the account is closed | Total Report | Closed Account |
|----------------|--|-----------------|--------|--|-------------------------------|-----------------------------------|--------------|----------------|
| 81 | Group of Voters – Nasto Palioski | 210078666230185 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 82 | Group of Voters – MENDI KJURA | 270078668600193 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 83 | Group of Voters – Igor Maleski | 290000002784242 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 84 | Group of Voters – Mirko Saveski | 240230121233600 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 85 | Group of Voters – Besnik Asani | 270078678240150 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 86 | Group of Voters Ljupcho Dunimagloski | 300020000652360 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 87 | Group of Voters Gjorgjija Igeski | 200004294491468 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 88 | Group of Voters Borche Chupetreski | 300020000652457 | ✓ | ✓ | ✗ | ✗ | ✗ | no statements |
| 89 | Group of Voters Pavlinche Mateska | 300020000652845 | ✗ | ✗ | ✗ | ✗ | ✓ | no statements |
| 90 | GV Goce Cvetkoski | 320100033696443 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 91 | Group of Voters Sasho Pivkovski | 300060000220611 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 92 | Igor Mitrevski | 250000802744078 | ✓ | ✗ | ✗ | ✗ | ✗ | no statements |
| 93 | Group of Voters – Mile Trajkovski | 210078656190103 | ✓ | ✓ | ✓ | ✓ | ✗ | ✓ |
| 94 | Group of Voters – Zoran Lazrovski – Paljo | 290000002780944 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 95 | Group of Voters – PETAR KOTEVSKI | 380071795300114 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 96 | GROUP OF VOTERS – DRGIM KAJA, List Holder | 300170000051098 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 97 | GROUP OF VOTERS JANESKI TANE, LIST HOLDER FOR MEMBERS OF THE COUNCIL OF THE MUNICIPALITY OF DEBRCA – 2025 LOCAL ELECTIONS FOR THE MUNICIPALITY OF DEBRCA | 280111104139760 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 98 | Group of Voters BORO GJOREVSKI | 300290000002689 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 99 | GROUP OF VOTERS RAIM KERA | 210078671580123 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 100 | GROUP OF VOTERS SAFET REDZOSKI | 280110104417214 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |

Source: SCPC administrative data from overall financial statements

ANNEX 1: Status of submitted/not submitted reports by submission period

| Ordinal number | Participant Name | Bank Account | Day 11 | 1 day after the end of the first round | 1 day before the second round | 1 day after the account is closed | Total Report | Closed Account |
|----------------|------------------------------------|-----------------|--------|--|-------------------------------|-----------------------------------|--------------|----------------|
| 101 | GV Nikolina Veljanoska | 300280000054924 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 102 | GV Nenad Mitreski | 300280000054730 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 103 | GV Ivica Avramoski | 300280000054827 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 104 | GV Violeta P. Smileski | 300280000055118 | ✗ | ✗ | ✗ | ✗ | ✓ | ✓ |
| 105 | GV Marjan Alampioski | 300280000055021 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 106 | Group of Voters – Burimi Nasufi | 210078687660104 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 107 | Group of Voters – Alija Kjazimi | 270278678590126 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 108 | Group of Voters – Anela Kjazimoski | 300160000044066 | ✗ | ✗ | ✗ | ✗ | ✗ | no o balance |
| 109 | Group of Voters Strasho Naumoski | 300020000652748 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 110 | Group of Voters Vancho Spirkoski | 270078664290192 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 111 | GV Danijel Stojanovski | 200004297436970 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 112 | GV Arben Dalipi | 270079677940129 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 113 | GV Marija Mladenovska | 200004296519156 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 114 | GV Rushan Hoda | 270078697540143 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 115 | Group of Voters Zlatko Shurbevski | 290000002780459 | ✗ | ✗ | ✗ | ✗ | ✓ | no statements |
| 116 | Group of Voters Kire Avtarovski | 200004295118379 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 117 | Group of Voters Bobi Boshevski | 200004296098467 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 118 | Group of Voters – Vasko Tomulevski | 500000001549020 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 119 | GROUP OF VOTERS – BLAZHE DIMITRIEV | 270078678670151 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 120 | GROUP OF VOTERS – ZORAN PETROV | 200004295841417 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |

Source: SCPC administrative data from overall financial statements

ANNEX 1: Status of submitted/not submitted reports by submission period

| Ordinal number | Participant Name | Bank Account | Day 11 | 1 day after the end of the first round | 1 day before the second round | 1 day after the account is closed | Total Report | Closed Account |
|----------------|--|-----------------|--------|--|-------------------------------|-----------------------------------|--------------|----------------|
| 121 | GROUP OF VOTERS – STIVEN PETKOVSKI | 200004296103026 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 122 | Group of Voters – Independent candidate for Mayor of the Municipality of Strumica, Dragan Koturovikj | 200004295533054 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 123 | Group of Voters GJORGI TANUSHEV | 200004295966450 | ✓ | ✓ | ✓ | ✗ | ✓ | no statements |
| 124 | GROUP OF VOTERS RISTO SAKALIEV | 320100033708665 | ✓ | ✓ | ✗ | ✗ | ✗ | ✓ |
| 125 | GROUP OF VOTERS PANCHO MINOV | 300040000211009 | ✗ | ✗ | ✗ | ✗ | ✗ | no o balance |
| 126 | GROUP OF VOTERS JOVAN ZLATEVSKI | 270078677430103 | ✓ | ✓ | ✗ | ✗ | ✗ | no statements |
| 127 | Group of Voters Stojancho Velkov | 200004295745290 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 128 | Group of Voters Branko Prodanovski | 200004296270933 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 129 | GROUP OF VOTERS IGOR AGOVSKI | 210078673790171 | ✓ | ✓ | ✗ | ✗ | ✓ | no statements |
| 130 | GROUP OF VOTERS DANIELA STOJKOVIKJ | 300000005357734 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 131 | GROUP OF VOTERS NEVENA GEORGIEVSKA | 270078657240135 | ✓ | ✗ | ✗ | ✗ | ✓ | no statements |
| 132 | Group of Voters Ognen Dedikj | 300000005347840 | ✓ | ✓ | ✓ | ✗ | ✓ | no statements |
| 133 | GROUP OF VOTERS TATJANA CHAKULEV | 270078657320160 | ✓ | ✓ | ✗ | ✗ | ✗ | ✓ |
| 134 | Keti Staleska | 270078684720138 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 135 | Marko Tashkov | 200004296321567 | ✓ | ✓ | ✗ | ✗ | ✗ | ✓ |
| 136 | Group of Voters Mitko Jakimovski | 300000005355309 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 137 | Group of Voters Biljana Ivanovska | 300000005361517 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 138 | Group of Voters Goran Gjurovski | 300000005362778 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 139 | Group of Voters Jane Dimeski | 300000005361420 | ✓ | ✓ | ✗ | ✗ | ✗ | ✓ |
| 140 | Group of Voters Dejan Dimitrovski | 210078693710188 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |

Source: SCPC administrative data from overall financial statements

ANNEX 1: Status of submitted/not submitted reports by submission period

| Ordinal number | Participant Name | Bank Account | Day 11 | 1 day after the end of the first round | 1 day before the second round | 1 day after the account is closed | Total Report | Closed Account |
|----------------|--|-----------------|--------|--|-------------------------------|-----------------------------------|--------------|----------------|
| 141 | Group of Voters – independent candidate Azem Sadiki | 270078686420160 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 142 | Group of Voters – holder of an independent list – Ibrahim Jusufovski | 270078684990186 | ✓ | ✗ | ✗ | ✗ | ✗ | no statements |
| 143 | Group of Voters ADNAN OSMANOVIKJ | 300000005361323 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 144 | GROUP OF VOTERS MARJAN KALEVSKI | 300000005363166 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 145 | GROUP OF VOTERS JANA BELCHEVA ANDREEVSKA (INDEPENDENTS TOGETHER) | 300000005362002 | ✓ | ✓ | ✓ | ✗ | ✗ | ✓ |
| 146 | Group of Voters Dragan Nikolovski | 500000001549117 | ✓ | ✓ | ✓ | ✓ | ✗ | no statements |
| 147 | Group of Voters Sasho Manevski | 300000005354921 | ✓ | ✗ | ✗ | ✗ | ✓ | ✓ |
| 148 | GROUP OF VOTERS GORAN MARKOVSKI | 300000005361905 | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| 149 | Group of Voters – Fekri Bakiu | 270078687310135 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 150 | GROUP OF VOTERS VISAR ADEMI | 200004294031203 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 151 | GROUP OF VOTERS SHKODRAN ALILI | 270078672550130 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 152 | Group of Voters – Goran Stojkovski-Diro | 300090000185932 | ✓ | ✓ | ✗ | ✗ | ✓ | ✓ |
| 153 | Group of Voters – Mesut Bajrami – For the Albanians of Kumanovo | 320100033714388 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 154 | Group of Voters – Ivan Petkovski | 300090000186029 | ✓ | ✗ | ✗ | ✗ | ✓ | ✓ |
| 155 | Group of Voters Agron Arifi | 200004296268896 | ✓ | ✓ | ✗ | ✓ | ✓ | no statements |
| 156 | Group of Voters – Kostadin Ristomanov | 200004295969069 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 157 | Group of Voters – David Zlatanov | 300030000297485 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 158 | Group of Voters Strahil Gavritov | 210078694440113 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 159 | Group of Voters Independents – Ile Bachanov | 300020000652651 | ✓ | ✗ | ✗ | ✗ | ✗ | no statements |
| 160 | Group of Voters Kujtim Kasami | 270078673440105 | ✗ | ✓ | ✗ | ✓ | ✗ | no statements |

Source: SCPC administrative data from overall financial statements

ANNEX 1: Status of submitted/not submitted reports by submission period

| Ordinal number | Participant Name | Bank Account | Day 11 | 1 day after the end of the first round | 1 day before the second round | 1 day after the account is closed | Total Report | Closed Account |
|----------------|--|-----------------|--------|--|-------------------------------|-----------------------------------|--------------|-------------------|
| 161 | Group of Voters Petkovski Zoran – Independents for Staro Nagorichane | 300090000185544 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 162 | Group of Voters Dalibor Serafimovikj | 300090000186223 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 163 | GROUP OF VOTERS MAGDALENA KARKALASHEVA | 320100033722730 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 164 | GROUP OF VOTERS – REMZI MAMUTI | 300000005358607 | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ |
| 165 | Vlatko Smokovski | 300000005355018 | ✗ | ✗ | ✗ | ✗ | ✗ | no o balance |
| 166 | Group of Voters Ivan Stanoev | 200004296500823 | ✗ | ✗ | ✗ | ✗ | ✗ | no statements |
| 167 | SUAD ADILOVIKJ | 210078692660260 | ✓ | ✓ | ✗ | ✗ | ✗ | don't have access |
| 168 | Limba Minova Zlateski | 300040000211979 | ✗ | ✗ | ✗ | ✗ | ✓ | ✓ |



РЕПУБЛИКА СЕВЕРНА МАКЕДОНИЈА

Republika e Maqedonisë së Veriut



Pursuant to Article 22 paragraph 1 of the Law on Prevention of Corruption and Conflict of Interest (“Official Gazette of Republic of Macedonia” No. 12/19) and Article 41-a paragraph 8 of the Rules of Procedure No.02-3794/1 dated 08.08.2019, No.03-2198/1 dated 12.06.2020, No.02-8774/1 dated 17.10.2022 and No.02-3087/1 dated 06.12.2024, the State Commission for Prevention of Corruption, at the x session, held on .10.2025, adopted the following:

REPORT

on corruption proofing of the wording of the Electoral Code, Chapter VI. Electoral Campaign, subtitled
“Media Representation” from Article 75 to Article 76- e

Title of the law:

- Electoral Code (“Official Gazette of the Republic of Macedonia” No.40/06, 136/08, 155/08, 163/08, 44/11, 51/11, 142/12, 31/13, 34/13, 14/14, 30/14, 196/15, 35/16, 97/16, 99/16, 136/16, 142/16, 67/17, 125/17, 35/18, 99/18, 140/18, 208/18, 27/19 and “Official Gazette of the Republic of North Macedonia” No. 98/19, 42/20, 74/21, 215/21, 58/24, 76/24).

On its own initiative: Based on Article 17 indent 2 of the Law on Prevention of Corruption and Conflicts of Interest, and in connection with the submitted complaint No.03-2594/1 dated 25.09.2025, which includes comments regarding the draft Guidelines for broadcasters for the 2025 local elections, the State Commission for Prevention of Corruption, at a collegium meeting held on 30.09.2025 decided to proactively conduct a corruption proofing of the wording of the Electoral Code, Chapter VI. Electoral campaign, subtitled “Media Representation” from Article 75 to Article 76-e.

Area: Electoral process

General assessment

1. Overview of the task:

The Electoral Code governs the manner, conditions and procedure for the election of the President, the election of the Members of the Assembly of the Republic of Macedonia, the election of the Members of the Councils of municipalities and the City of Skopje, the election of mayor of municipalities and of the City of Skopje, the method and procedure for registration of the electoral right, maintaining the Voter List, delimitation of electoral districts, as well as determination of polling stations and conditions for their operation.

2. Additional materials reviewed/consulted:

- Constitution of the Republic of North Macedonia;
- Law on Prevention of Corruption and Conflict of Interest (“Official Gazette of the Republic of Macedonia” No.12/2019);

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- Guidelines for Broadcasters for the 2025 Local Elections, No.01-4137/1 dated 26.09.2025;
- Law on Audio and Audiovisual Media Services (“Official Gazette of the Republic of Macedonia” No.184/13, 13/14, 44/14, 101/14, 132/14, 142/16, 132/17, 168/18,248/18 and 27/19 and “Official Gazette of the Republic of North Macedonia” No.42/20, 77/21, 154/23, 55/24 и 193/24).

The State Commission for Prevention of Corruption, pursuant to Article 17 indent 2 of the Law on Prevention of Corruption and Conflicts of Interest, and in accordance with the Methodology on corruption proofing of legislation No.03-4058/1 dated 27.11.2020, carried out the corruption proofing of the stated legal provisions and adopted the following:

CONCLUSION

Based on the conducted analysis of the wording of the Electoral Code, Chapter VI. Electoral campaign, subtitled “Media Representation” from Article 75 to Article 76-e, the State Commission for Prevention of Corruption has identified regulatory risks.

Rationale

The State Commission for Prevention of Corruption decided to proactively conduct corruption proofing of the Electoral Code provisions pertaining to the media representation, specifically: Article 75, 75-a, 75-b, 75-c, 75-d, 75-f, 76, 76-a, 76-b, 76-c, 76-d и 76-e, thereby opened a casefile within the Department for corruption proofing of legislation.

To ensure consistency and comprehensiveness, provisions of the Electoral Code correlated to the provisions of Article 75 to Article 76- e were also considered.

During the corruption proofing of the said provisions, the State Commission for Prevention of Corruption identified corruption risks in Article 75-f of the Electoral Code.

1. **Article 75-f paragraph (1)** of the Electoral Code reads as follows:

“During the electoral campaign, and in the first and second round of voting, broadcasters covering elections may allocate a total of nine minutes and thirty seconds of additional time on a real-time broadcast program intended exclusively for paid political advertising, of which: at most four minutes may be allocated to the two largest political parties in power that received the highest number of votes in the last parliamentary elections in the Assembly of the Republic of Macedonia, distributed according to a prior written agreement; at most four minutes may be allocated to the two largest opposition parties that received the highest number of votes in the last parliamentary elections in the Assembly of the Republic of Macedonia, distributed according to a prior written agreement; one minute may be allocated to political parties represented in the Assembly of the Republic of Macedonia that did not win enough seats in the last parliamentary elections to form a parliamentary group, distributed according to a prior written agreement; and thirty seconds may be allocated to political parties not represented in the Assembly of the Republic of Macedonia or to candidates, distributed according to a prior written agreement.”

From the analysis of the wording of Article 75-f paragraph (1), the State Commission for Prevention of Corruption identified regulatory risks due to ambiguous legal wording and lack of precision in the normative content, which, pursuant to the Methodology on corruption proofing of legislation can create conditions for legal uncertainty and unequal application.

Specifically, within the corruption proofing of the stated provision, which regulates the timing and manner of broadcasting programs intended exclusively for paid political advertising by broadcasters covering elections during the electoral campaign, the following regulatory risks were identified:

1.1) First regulatory risk

In prescribing the provision, the legislator uses words, such as “may” and “at most” which used within the context of other words, leave room for different interpretation. The word “may”, as used in the provision, by its very meaning neither implies nor points to obligatory nature, which means that, in the application of the law, it could be interpreted differently. The wording has no clear imperative nature and may therefore lead to different interpretation in practice, particularly in regard to the equal access of election contestants to media space.

Also, the phrase “at most four minutes” may be differently interpreted in practical application, because its use indicates that the legislator has set an upper limit for paid political advertising that may not be exceeded, but has not prescribed a lower limit for such advertising.

Given the above, the State Commission for Prevention of Corruption found that the choice of words and the way they are connected, i.e. the construed sentence in the said provision includes incoherent legislative-normative technique of drafting and ambiguity, thereby leaving space for certain entities applying the law to interpret it differently and as result, to apply it inconsistently in different situations.

1.2) Second regulatory risk

Furthermore, the above regulatory risk according to the State Commission for Prevention of Corruption, is in direct cause-and-effect relation with another emerging regulatory risk due to incomplete coverage of all aspects in the legislation, i.e. failure to include all electoral campaign participants for whom broadcasters will air program intended exclusively for paid political advertising during the electoral campaign.

Specifically, in the Glossary of the Electoral Code in Article 2 indent 14, 24, 26 and 28, the legislator applied a broad definition regarding the meaning of terms, such as:

“14.”Participant in the electoral campaign” means an authorized person from a political party, coalition or group of voters who organize the electoral campaign:”,

24. “Direct access to voters” refers to forms of free political presentation and paid political advertising, through which participants in the electoral campaign can freely promote their programs, positions, and candidates;

26.”Paid political advertising“ is the direct access of participants in the electoral campaign to voters, through which, for financial compensation, electoral programs, positions and candidates are promoted;,”

28." Electoral media representation" means the promotion (directly or indirectly) of positions, programs, platforms, achievements, activities, etc. of the political parties, coalitions, groups of voters and their representatives. "

On the other hand, in prescribing Article 75-f paragraph (1), the legislator applied a different approach by enumerating the participants in the electoral campaign as follows:

- "the two largest political parties in power that won the highest number of votes in the last parliamentary elections for the Assembly of the Republic of Macedonia"**,
- "the two largest political parties in opposition that won the highest number of votes in the last parliamentary elections for the Assembly of the Republic of Macedonia"**
- "political parties represented in the Assembly of the Republic of Macedonia that did not win sufficient votes in the last parliamentary elections to form a parliamentary group"**, and
- "political parties not represented in the Assembly of the Republic of Macedonia or candidates"**.

The approach of regulation applied in the wording of Article 75-f paragraph (1) leaves space for unforeseen situations to occur in its application, should parties appear in the electoral campaign that are not covered by this provision, even though they meet the legal requirements and have the right to participate in the electoral campaign, in accordance with the Glossary from Article 2 of the Electoral Code.

Therefore, taking into account the first regulatory risk under point 1.1) which concerns the choice of words, the sentence structure and the incoherent legislative-normative technique of drafting, and the second regulatory risk under point 1.2) due to incomplete legal coverage in Article 75-e paragraph (1) of all participants that may appear in the electoral campaign, it turns out that there is legal gap due to incomplete regulation of the provision. Consequently, these two regulatory risks may together create the possibility for subjective interpretation and different application.

1.3) Third regulatory risk

Furthermore, in the provision of Article 75-f paragraph (1) of the Electoral Code, the legislator, in regulating the paid political advertising, among others, has taken into account **"the two largest political parties in power and opposition which won the highest number of votes in the last parliamentary elections for the Assembly of the Republic of Macedonia"**.

At the same time, the Glossary of the Electoral Code, in Article 2 indent 14 stipulates that a participant in the electoral campaign may also be an authorized person from a "coalition" which is an association based on agreement between two or more registered political parties to jointly participate in elections.

If these provisions are considered in correlation, it turns out that the legislator failed to stipulate time for paid political advertising of the coalitions that jointly participated in the last parliamentary elections for the Assembly and won the highest number of votes. Therefore, this legal provision lacks alignment, both terminologically and substantively, with the Glossary laid down in Article 2 of the Electoral Code.

According to the State Commission for Prevention of Corruption, a regulatory risk arises in this provision due to the lack of alignment between Article 75-f paragraph (1) and the Glossary of the Electoral Code.

2. **Article 75-f paragraph (12)** stipulates the following:

“The advertising space of electronic media (internet portals) and printed media intended for paid political advertising shall be allocated using the following criteria:

- a maximum of 45% of the advertising space may be allocated to the two largest political parties in power that won the highest number of votes in the last parliamentary elections for the Assembly of the Republic of Macedonia,
- a maximum of 45% of the advertising space may be allocated to the two largest political parties in opposition that won the highest number of votes in the last parliamentary elections for the Assembly of the Republic of Macedonia,
- at most 7% of the advertising space may be allocated to the political parties in the Assembly of the Republic of Macedonia that in the last parliamentary elections for the Assembly did not win sufficient votes to form a parliamentary group, and
- at most 3% of the advertising space may be allocated to the political parties that are not represented in the Assembly of the Republic of Macedonia or candidates.”

In the corruption proofing of the provision in Article 75-f paragraph (12), which regulates the right to paid political advertising in the advertising space of electronic media (Internet portals) and printed media, the State Commission for Prevention of Corruption identified the same regulatory risks previously explained for paragraph (1) of this Article.

3. **Article 75-f paragraph (13)** stipulates the following:

“Broadcasters, printed media and electronic media (internet portals) in the Republic of Macedonia are required to provide equal access to paid political advertising to all participants in the electoral process.”

After analyzing paragraph (13) of this Article, the State Commission for Prevention of Corruption found the existence of an internal conflict of this paragraph with paragraph (1) and (12) of the same Article, which amounts to regulatory risk of corruption, given that the provisions lack mutual alignment. Specifically, with the provision of paragraph (13) of this Article, the legislator prescribed an obligation for broadcasters, printed media and electronic media (Internet portals) in the Republic of Macedonia to provide all participants in the electoral process with equal access to paid political advertising, which, on the other hand, is not ensured under paragraphs (1) and (12) of this Article.

4. Given the previously identified regulatory risks regarding media representation of participants in the electoral campaign, the State Commission for Prevention of Corruption also examined the remaining provisions of the Electoral Code that correlate with such representation. In doing so, it found that Article 75-f paragraph (1) and (12) have not been aligned also with the provision of **Article 70 paragraph (2)**, in which the legislator stipulates the following:

“Participants in the electoral campaign have the right to equal access and, under same conditions, to use all types of political propaganda, reporting and other forms of propaganda aimed at influencing the voters’ decision in elections”.

From the wording of this provision, an internal conflict was determined, that is, lack of legal alignment of Article 75-f paragraph (1) and (12) with Article 70 paragraph (2) of the Electoral Code.

Conclusions and recommendations

In its analysis and corruption proofing of the above stated provisions of the Electoral Code, the State Commission for Prevention of Corruption concluded that measures need to be taken to address the identified issues through legislative changes and amendments, as follows:

- Use of clear and unambiguous wording in stipulating the timing of paid political advertising by broadcasters, as laid down in Article 75-f paragraph (1);
- Alignment of the provision of Article 75-f paragraph (1) and (12), with Article 2 indent 14) of the Electoral Code;
- Alignment of Article 75-f paragraph (1) and (12), with paragraph (13) of the same Article;
- Alignment of Article 75-f paragraph (1) and (12), with Article 70 paragraph (2) of the Electoral Code.

To minimize regulatory risks of corruption that may arise from the application of the Electoral Code, and in line with the Methodology for corruption proofing of legislation, the State Commission for Prevention of Corruption hereby submits this opinion.

Furthermore, the State Commission for Prevention of Corruption urges the competent Ministry to provide timely report on the activities taken to address the identified regulatory risks, and provide justification for any recommendations that were not accepted.