



Strasbourg, 8 June 2009

Greco (2009) 10E

42nd Plenary Meeting of GRECO
(Strasbourg, 11-15 May 2009)

SUMMARY REPORT

I. Opening of the Plenary Meeting

1. The 42nd Plenary Meeting of GRECO was chaired by Mr Drago KOS (President of GRECO, Slovenia) from Monday to Wednesday, by Mr Marin MRČELA (Vice-President of GRECO, Croatia) on Thursday and by Mr Richard M. ROGERS (Bureau Member, United States of America) on Friday.
2. The President opened the meeting by welcoming all representatives, referring in particular to those who had been newly nominated. The list of participants appears in Appendix I to this report.

II. Adoption of the agenda

3. The agenda was adopted as it appears in Appendix II to this report.

III. Information provided by the President and the Executive Secretary

4. The **President** reported on his exchange of views with the Ministers' Deputies of the Council of Europe (1052nd meeting, 25 March 2009) at which he had presented GRECO's Ninth General Activity Report (2008). Copies of his speech were available (Greco Inf (2009) 3). He wished to thank the numerous Permanent Representatives to the Council of Europe who had made complimentary remarks commending GRECO on its work, for their support. He was particularly pleased to report that San Marino's intention to accede to GRECO as soon as possible was confirmed.
5. He went on to outline the main results of Bureau 48, asking participants to refer to the report of the meeting (Greco (2009) 9E):
 - comments from Azerbaijan on statements made by the Technical Cooperation Department on the Joint First and Second Round Compliance Report on Azerbaijan had been examined by the Bureau which had taken the view that a revision of GRECO's conclusions regarding recommendations i, ii and xxi was not required;
 - the Bureau had agreed that when drafting or adopting recommendations in the context of Theme I of the Third Evaluation Round (Incriminations), evaluators and GRECO sitting in plenary were not to go beyond the scope of the standards set by the Criminal Law Convention on Corruption (ETS 173) and its Additional Protocol (ETS 191) and were to focus on legislation, its application as well as possible problems of application;
 - it had also agreed that in the framework of Third Round (Theme I) evaluations of countries that have not yet ratified the Criminal Law Convention on Corruption (ETS 173), recommendations to ratify the convention and to remedy deficiencies in national legislation could in principle be addressed to the countries concerned;
 - reflecting on the practicalities of the preparation of Third Round Compliance Reports which would cover both themes of the round, it had been decided that in principle they should be prepared and defended by two rapporteurs who might, however, be assisted by a scientific expert in the field of political financing;

- at the forthcoming *tour de table* on corruption in sport to be held during GRECO 44 (6-9 October 2009) GRECO delegations would be invited to comment on:

- i) the legal and institutional framework for fighting corruption in sport, including the role of sports organisations ;
- ii) obstacles to effectively combating corruption in sport and
- iii) examples of good practice ;

participants would also be welcome to raise any other issues of relevance to the topic which was high on the international agenda, as evidenced by the resolution adopted at the 11th Council of Europe Conference of Ministers responsible for Sport (Athens, December 2008) on Ethics in Sport;

- the reflection process on suitable themes for the Fourth Evaluation Round had been initiated and the Bureau had been particularly favourable to the so-called "new approach" option (cf. Bureau 48 Report – Greco (2009) 9E, paragraph b) and related decision);

6. The President had visited Georgia (Tbilisi, 11 March) where he had met with the Minister of Justice and been informed of the efforts being undertaken to implement the recommendations contained in GRECO's Second Round Evaluation Report on Georgia, including consideration of the possibility of establishing a specialised prosecution service; he had also held talks in Greece on anti-corruption legislation (9 April) and had discussed developments since the establishment of a Government Agent for Anti-Corruption Policy with the President and Prime Minister of Ukraine (Kiev, 24 April).

7. The Commission for the Prevention of Corruption of Slovenia would host the ninth Conference of the European Partners against Corruption (EPAC). Participants were invited to contact members of the Delegation of Slovenia regarding arrangements.

8. Finally, the President informed the plenary of recent positive developments as regards the funding allocated to the Commission for the Prevention of Corruption of Slovenia which he hoped would be maintained.

9. The **Executive Secretary** reported on the following developments since GRECO's 41st Plenary Meeting (February 2009) :

- it was likely that a replacement for Tania VAN DIJK who was currently on sabbatical leave would be in place by the beginning of June. Moreover, appointment to the new post in the Secretariat should soon be completed, pending approval by the Secretary General. He thanked his Secretariat for the substantial additional efforts made to carry out the work programme in the interim and apologised to delegations for some unavoidable delays;

- he had participated in the 2nd meeting of the Expert Group on the Omnibus Survey Software to gather information on the implementation of the United Nations Convention against Corruption (UNCAC) and the United Nations Convention against Transnational Organized Crime (UNTOC) and its Protocols (Vienna, 23 - 24 February); the initiative to develop a software package to collect information on implementation of the treaties originated in a decision of the First Conference of States Parties to introduce a self-assessment checklist and a subsequent request from the Second Conference of States Parties that a more comprehensive information-gathering tool be developed. The Executive Secretary had strongly emphasised the need for a system of cross-referencing which would alert users of the tool to pertinent information they had already provided in other contexts, for example in the framework of GRECO procedures;

- further to the contacts with EUROJUST reported on at the last plenary meeting, it had been suggested, in a letter from its President, Mr José Luis LOPES DA MOTA that possibilities for a closer association with GRECO's activities be explored. Similarly, the Secretariat of the Directorate General Justice, Freedom and Security (JLS) of the European Commission had indicated an interest in becoming involved in GRECO's work. These issues would be discussed further on the occasion of exchanges of views with representatives of EUROJUST (timing to be determined by Bureau 49) and the European Commission (43rd Plenary Meeting, 29 June – 2 July 2009);
 - Belarus had recently submitted to the Council of Europe's Directorate of Legal Advice and Public International Law (Jurisconsult) a revised draft agreement between Belarus and the Council of Europe concerning the privileges and immunities of the representatives of the members of GRECO and members of evaluation teams. The finalisation of this agreement would be a pre-requisite for the country's participation in GRECO, due to the fact that, as a non-member State of the Council of Europe, Belarus was not a party to the General Agreement on Privileges and Immunities of the Council of Europe (ETS 002). There was now a realistic expectation that Belarus' membership in GRECO would become effective in due course ;
 - copies were available of the Non-paper on the issue of effective regret, updated to include information provided by Estonia, Finland, Lithuania, the Slovak Republic and Spain; it was also included in the documentation provided to evaluation teams carrying out Third Round evaluations (Theme I - Incriminations);
 - a proposal made by INTERPOL to provide GRECO with information on the Anti-Corruption Academy to be opened in Vienna next year;
 - the Secretariat was providing support (proposals for speakers and participants to ensure that GRECO's work was reflected) to the institute of Social Sciences of Lisbon University, which was organising a conference on "New Trends in Political Financing Regulation: the Role of Monitoring/Enforcement Bodies" which would be held in Lisbon on 29-31 October 2009.
10. With regard to GRECO's next evaluation round, the Executive Secretary informed the plenary that it was foreseen that the last on-site visits of the Third Evaluation Round would be carried out during the beginning of the second half 2011. The **Fourth Evaluation Round** should, therefore, be launched in 2012. Following a similar timetable to the one used to prepare the Third Evaluation Round, the reflection process on suitable themes for GRECO's Fourth Evaluation Round had begun within the Secretariat and the Bureau. Should the usual approach be followed (para. (a) – Bureau 48 Report), anti-corruption measures in the private sector and the Civil Law Convention on Corruption (ETS 174) had as yet never been dealt with. As the President had reported earlier, the Bureau had felt that the so-called "New approach" (para (b) – Bureau 48 Report) was feasible and presented a number of advantages. If such an approach was adopted, it would be possible to consider including in each round a specific additional subject such as public accountability or codes of conduct for elected representatives for example. Discussions within the Bureau would be continued at its next meeting in June and, at a future plenary meeting, a *tour de table* would be held to discuss the options proposed. A feature of the preparatory work carried out for the Third Round which was worth recalling in the run-up to a new evaluation round, as it had been considered very successful by GRECO, was the use of working parties to prepare the draft questionnaires.

11. GRECO representatives had received the draft Programme for GRECO's **10th Anniversary Conference** to be held in Strasbourg on 5 October 2009 (Greco (2009) 8E). The Executive Secretary thanked the authorities of Monaco and Slovenia for the financial support they would be providing for the holding of the event. Ministers of Justice – or in the case of Poland, the Anti-corruption Minister – from nine member States had already indicated their willingness to address the conference. Information from Heads of GRECO delegations concerning ministerial participation (speakers) during Sessions I/II was still awaited from France, the United Kingdom and the United States of America.
12. The Bureau had proposed that the entire conference be made open to the press and the Secretariat would proceed along those lines – making provision for the possibility of organising individual interviews with Ministers – in collaboration with the Council of Europe's Directorate of Communication.
13. As a first stage in the preparations for the conference, the Secretary General of the Council of Europe would invite the Ministers of the countries indicated under Sessions I/II (cf draft Programme) to address the conference for up to 10 minutes. These invitation letters would be sent to Ministers via the Permanent Representations to the Council of Europe of the countries concerned with a copy to the Heads of Delegation in GRECO.
14. All GRECO member States as well as the two Council of Europe member States not yet members of GRECO (Liechtenstein and San Marino) would be invited to participate in the conference. To this effect a general invitation letter would be addressed by the Director General of Human Rights and Legal Affairs to Permanent Representatives to the Council of Europe, inviting States to appoint up to 5 participants (3 in the case of Liechtenstein and San Marino). In order to facilitate proper coordination regarding the composition of delegations to the conference, the invitation letters would ask addressees to consult with the Head of their country's Delegation in GRECO. This latter point was important as it was to be borne in mind that the limit of 5 persons per delegation included GRECO representatives. It would not be possible for GRECO's budget to bear the costs of participation in the conference. However, the costs related to the participation of one GRECO representative per member State would be borne from Monday 5 to Friday 9 October for participation in both the conference and the ensuing GRECO 44 Plenary Meeting under the normal conditions applied to plenary meeting participation. To this effect, the normal format of plenary convocation would be used to invite GRECO representatives to both.

IV. Third Evaluation Round

15. The plenary carried out an in-depth reading, principally of the analytical parts of the draft Third Round Evaluation Reports on **Spain, Belgium and Albania**, with the participation of the Evaluation Teams which had carried out on-site visits to Madrid, Brussels and Tirana. Before adoption, the reports underwent a second reading of drafts which had been revised in the light of the discussions held during the first reading.
16. GRECO adopted the Third Round Evaluation Reports on Spain (Greco Eval III Rep (2008) 3E – Themes I and II), Belgium (Greco Eval III Rep (2008) 8E - Themes I and II) and Albania (Greco Eval III Rep (2008) 7E - Themes I and II). The authorities of the countries concerned were invited to authorise publication of the reports as soon as possible¹. The deadline fixed for submission of Situation Reports on implementation of the recommendations contained in the reports was 30 November 2010 in all three cases.

¹ The Third Round Evaluation Report on Spain was subsequently made public on 28 May 2009.

17. The Plenary noted that Spain was the first member subject to Third Round Evaluations which, at the time of the adoption of the evaluation report, had not yet ratified the Criminal Law Convention on Corruption (ETS 173), nor had it signed/ratified the Additional Protocol (ETS 191) thereto. Notwithstanding this, the evaluation had been carried out in light of the standards set by the Convention and its Protocol, an approach which would be followed in other comparable cases as well. This approach involved the issuing to Spain of a general recommendation "to proceed swiftly with the ratification of the Criminal Law Convention on Corruption (ETS 173) as well as the signature and ratification of its Additional Protocol (ETS 191)" which was complemented by the following comment (to be used henceforth in comparable situations): "In this context, attention is drawn to the formal Appeal by the Committee of Ministers to States, made at its 103rd Ministerial Session on the occasion of the adoption of the text of the Criminal Law Convention on Corruption (4 November 1998), to limit as far as possible the reservations that they declare pursuant to the Convention, when expressing their consent to be bound by the Convention. On the same occasion the Committee of Ministers appealed to States 'which nevertheless find themselves obliged to declare reservations, to use their best endeavours to withdraw them as soon as possible.' The recommendations contained in paragraphs 93, 94, 95, 96 and 98 of this report are without prejudice to the right of Spain to enter declarations and reservations pursuant to Article 37 of the Convention."².

V. Joint First and Second Evaluation Rounds

18. The draft Joint First and Second Round Compliance Report on **Ukraine** had been prepared, on the basis of a Situation Report submitted by the authorities of the country, in consultation with Rapporteurs designated on behalf of Cyprus and the United Kingdom. The Rapporteurs communicated their observations on the draft compliance report to the plenary and a detailed reading of it followed.
19. GRECO adopted the Joint First and Second Round Compliance Report on Ukraine (Greco RC I/II Rep (2009) 1E) and invited Ukraine to authorise its publication as soon as possible. The deadline fixed for the submission of additional information regarding the further implementation of recommendations was 30 November 2010.

VI. Second Evaluation Round

20. The draft Second Round Compliance Report on **Georgia** had been prepared, on the basis of a Situation Report submitted by the authorities of the country, in consultation with Rapporteurs designated on behalf of Latvia and Norway. The Rapporteurs communicated their observations on the draft compliance report to the plenary and a detailed reading of the report followed.
21. GRECO adopted the Second Round Compliance Report on Georgia (Greco RC-II (2008) 9E) and invited the country's authorities to authorise its publication as soon as possible³. The deadline fixed for the submission of additional information regarding the further implementation of recommendations was 30 November 2010.
22. The plenary also examined the draft Addenda to the Second Round Compliance Reports on **Belgium, Denmark, France** and **Slovenia** (second Addendum). The drafts were based on information provided by the authorities of the countries

² Evaluation Report on Spain, Incriminations (ETS 173 and 191, GPC 2) - Greco Eval III Rep (2008) 3E - Theme I, paragraph 87.

³ The Second Round Compliance Report on Georgia was subsequently made public on 27 May 2009.

concerned as required by the conclusions of GRECO's Second Round Compliance Reports. Following a detailed reading, GRECO adopted the Addenda to the Second Round Compliance Reports on Belgium (Greco RC-II (2006) 9E Addendum), Denmark (Greco RC-II (2007) 2E Addendum), France (Greco RC-II (2006) 12E Addendum) and Slovenia (Greco RC-II (2006) 1E Addendum II) and thus concluded the Second Round compliance procedure in respect of all four countries. GRECO noted with satisfaction the authorisation from France to publish the above-mentioned Addendum and the authorities of Belgium, Denmark and Slovenia were invited to do so as soon as possible.

VII. Exchange of views

23. Mr François VINCKE, Chair of the Anti-Corruption Commission of the International Chamber of Commerce (ICC) participated in an exchange of views with GRECO. Mr VINCKE opened by providing a brief history of the establishment of the ICC shortly after the First World War. He then went on to provide an overview of the ICC's objectives and activities in the anti-corruption field. In 1977 the ICC had played a pioneering role in encouraging self-regulation in the anti-corruption field. The ICC became the first international private organisation to propose to the business community to impose a general prohibition on all forms of bribery and the development of codes of conduct was recommended.
24. Later in 1994 the organisation relaunched the movement against corruption. The business community was encouraged not only to have their own codes of conduct but to put into place compliance programmes. The seven components of a compliance programme were the introduction of a code of conduct, designation of compliance officers, implementation of Human Resources policies which allow for the effective implementation of the provisions of the code of conduct, information and training, management control and internal/external audit, making provision for disciplinary sanctions and finally, providing for adaptations to codes of conduct as and when necessary.
25. ICC anti-corruption products available to its members included a set of Rules and Regulations, a Handbook – "Fighting Corruption", Guidelines on Whistleblowing as well as on Intermediaries (an essential and yet potentially problematic element in business relations), the RESIST listing which provided proposals as to how to react when exposed to extortion attempts. The ICC also sometimes took part in sectoral initiatives in specific areas such as defence and aeronautics.
26. Another important component of ICC's anti-corruption efforts was advocacy with international organisations. For example, some 25 Chief Executives of prestigious companies around the world had addressed a letter to the UN Secretary General supporting the United Nations Convention against Corruption (UNCAC) and urging the States Parties to create an effective monitoring mechanism. Having been involved in GRECO evaluation visits on some occasions, he found the format of GRECO monitoring particularly efficient. He also congratulated the Council of Europe for having included in its legal instruments a prohibition of private to private corruption. This form of corruption, defined by ICC as corruption carried out without the consent or knowledge of the board of directors was very detrimental to a company and escaped management review. He felt that it was essential that legal provisions be implemented to counter it.
27. Regarding the focus of the Anti-Corruption Commission in the future, two areas were highlighted. First, the need to envisage some form of 'reward' for compliant companies, i.e. those who successfully implement comprehensive compliance programmes. Such a 'reward', which would aim to encourage companies to continue implementing effective anti-corruption measures could take the form of a mitigation of corporate liability; it would be desirable in this connection to

develop European sentencing guidelines drawing inspiration from those applied by the US Department of Justice. Another potential area for attention, would be to look into the possibility of agreeing (for example with the Council of Europe and/or European Union) on a definition of the breach of professional duties which would be particularly useful when dealing with cases of private to private corruption.

28. In reply to questions from the Plenary, Mr VINCKE highlighted that the aim of the ICC was to support and promote liberalism, free enterprise and sound capitalism while at the same time insisting on the importance of supporting such mechanisms with good ethical values and conduct. The current financial crisis, was to his mind, an opportunity for attaining a 'level playing field' on which enterprises could develop without fear of competition from businesses that might resort to unethical practices. It was not ICC's role to carry out monitoring as it encouraged self-regulation by enterprises. However, feedback was received through its national chapters with which members had close links, and to a certain extent and on a voluntary basis through the Global Reporting Initiative (GRI). There had also been a growing number of incidences of companies seeking certification, stating that they would welcome scrutiny by relevant professional bodies.
29. When further discussing the notion of European sentencing guidelines, the example of Italy was used to show how adherence to a prescribed organisational model could, if a company fell foul of a rogue employee, allow for an alleviation of corporate liability or for exemption from sanctions. The ICC preferred to promote the need for preventive measures and incentives to encourage good practices. He expressed concern at the blacklisting of companies which could hinder competition.
30. The ICC Guidelines on Whistleblowing had been developed in the light of an audit report which had shown that 25% of economic fraud was discovered thanks to whistleblowing. The guidelines aimed to reconcile the different approaches around the world and provided for a system within corporations which allowed managers to be made aware of acts of corruption while at the same time protecting the legitimate interests of workers and co-workers.
31. Finally, the issue of corruption in sport was also mentioned and though the ICC did not deal specifically with sports organisations, its recommendations and guidelines which aim towards a prohibition of any kind of corruption, including private-to-private corruption, could be applied to any sector of activity.

VIII. Adoption of decisions

32. The decisions of the 42nd Plenary Meeting were adopted, as they appear in document Greco (2009) 9E.

IX. Forthcoming meetings

33. GRECO noted that the Bureau would hold its 49th meeting in Strasbourg on 12 June 2009. The 43rd Plenary Meeting would be held in Strasbourg on 29 June – 3 July 2009⁴.

⁴ It was subsequently decided that the meeting would be reduced to 4 days, i.e. 29 June – 2 July 2009.

APPENDIX I

LIST OF PARTICIPANTS

ALBANIA / ALBANIE

Mr Oerd BYLYKBASHI (Head of delegation)
Director, Department of Internal Administrative Control and Anti-Corruption (DIAC)
Council of Ministers

M. Edmond DUNGA
Head of the Office in the Anticorruption Secretariat, Regional Anti-Corruption Initiative (RAI)

Ms Helena PAPA
Inspector, Department of Internal Administrative Control and Anti-Corruption, Council of Ministers

ANDORRA/ANDORRE

Apologised / Excusé

ARMENIA / ARMENIE

Mr Artur OSIKYAN (Head of delegation)
Deputy Chairman of the State Revenue Committee

AUSTRIA / AUTRICHE

Apologised / Excusé

AZERBAIJAN / AZERBAIDJAN

Mr Inam KARIMOV (Head of delegation)
Chief Adviser, Department of Coordination of Law Enforcement Bodies, Executive Office of the
President of the Republic

BELGIUM / BELGIQUE

Mlle Claire HUBERTS (Chef de délégation)
Attachée, Service des principes de droit pénal et de procédure pénale, Direction Générale des
Droits et Libertés fondamentales, Service public fédéral Justice (SPF Justice)

M. Paul MULS
Premier conseiller de direction, Secrétaire de la commission de contrôle des dépenses électorales
Chambre des représentants

M Guido HOSTYN
Premier conseiller de direction, Secrétaire de la Commission de contrôle des dépenses électorales

M Patrick DE WOLF
Coordinateur principal du Réseau d'expertise sur la corruption du Collège des Procureurs généraux,
Parquet Général près la Cour d'Appel

M Patrick VANLEEMPUTTEN
Directeur des service législatifs du Parlement de la Région de Bruxelles-Capitale

M Hubert PONCELET
Conseiller en droit économique et financier, Cellule Stratégique du Ministre de la Justice

BOSNIA AND HERZEGOVINA / BOSNIE-HERZEGOVINE

Mr Sead TEMIM
Prosecutor, Federal Prosecutor's Office of the Federation of Bosnia and Herzegovina

BULGARIA / BULGARIE

Ms Irena BORISOVA
Head of Department of International Cooperation and Legal Assistance in Criminal Matters
Directorate of International Cooperation and European Integration, Ministry of Justice

CROATIA / CROATIE

Mr Marin MRČELA (Head of delegation)

Vice-Président du GRECO – Vice-President of GRECO

Justice of the Supreme Court

CYPRUS / CHYPRE

Mr Philippos KOMODROMOS (Head of delegation)

Counsel of the Republic, Law Office of the Republic of Cyprus

CZECH REPUBLIC / REPUBLIQUE TCHEQUE

Ms Marta LÉBLOVÁ

Public Administration Section, Ministry of the Interior

DENMARK / DANEMARK

Mr Flemming DENKER

Deputy Director, Public Prosecutor for Serious Economic Crime

ESTONIA / ESTONIE

Ms Mari-Liis SÖÖT (Head of delegation)

Head of Criminal Statistics and Analysis Division, Criminal Policy Department

Ministry of Justice

FINLAND / FINLANDE

Mr Kaarle J. LEHMUS (Head of delegation)

Inspector General of the Police, Ministry of the Interior, Police Department

Ms Helinä LEHTINEN

Ministerial Advisor, Ministry of Justice, Crime Policy Department

FRANCE

M Jean ALEGRE (Chef de délégation)

Chargé de mission auprès du directeur des affaires juridiques, Ministère des Affaires étrangères et européennes

M Michel BARRAU

Chef du Service Central de Prévention de la Corruption, Service Interministériel placé auprès du Ministère de la Justice

Mme Solène DUBOIS

Magistrat, Ministère de la Justice, Direction des Affaires Criminelles et des Grâces

M Jean Marc CATHELIN

Sous- directeur au Ministère de la Justice (DACG)

M Yves Marie DOUBLET

Directeur adjoint, Assemblée Nationale, Service des affaires juridiques, Division contrôle et études juridiques

M Richard GHEVONTIAN

Professeur des Universités, Directeur de recherches au Groupe d'Etudes et de Recherches sur la Justice

GEORGIA / GEORGIE

Mr Vakhtang LEJAVA (Head of delegation)

Chief Advisor to the Prime Minister of Georgia on Economic and Governance Affairs

Mr Dimitri DZAGNIDZE

Deputy Justice Minister

Mr Giorgi JOKHADZE

Head of Analytical Department, Ministry of Justice

Ms Lasha JUGELI

Deputy Head, Financial Supervisory Agency

GERMANY / ALLEMAGNE

Ms Nora KAISER

Deputy Head of Division, Economic Crime, Computer Crime, Corruption-related Crime and Environmental Crime, Federal Ministry of Justice

GREECE / GRECE

Ms Maria GAVOUNELI (Head of delegation)

Lecturer in International Law, University of Athens

HUNGARY / HONGRIE

Mr Ákos KARA (Head of delegation)

Deputy Head of Department, Ministry of Justice

ICELAND / ISLANDE

Apologised / Excusé

IRELAND / IRLANDE

Ms Aileen HARRINGTON

Assistant Principal Officer, Criminal Law Reform, Department of Justice, Equality and Law Reform

ITALY / ITALIE

Mr Silvio BONFIGLI

Magistrate, Anticorruption and Transparency Service

Mr Fabrizio GANDINI

Magistrate, Magistrate attached to Office I, Directorate General of Penal Law

LATVIA / LETTONIE

Ms Violeta ZEPPA-PIEDĪTE

Head of Legal Division, Corruption Prevention and Combating Bureau

LITHUANIA / LITUANIE

Ms Elena KONCEVICIUTE

International Relations Officer, International Cooperation Division, Special Investigation Service

LUXEMBOURG

M. Frank ENGEL

Juriste, Secrétaire de la fraction parlementaire du parti chrétien social (CSV)

MALTA / MALTE

Apologised / Excusé

MOLDOVA

Mrs Elena ECHIM

Director of International Law Department, Ministry of Foreign Affairs and European Integration

MONACO

Mme Ariane PICCO-MARGOSSIAN (Chef de délégation)

Directeur, Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN)

M. Frédéric COTTALORDA

Chef de Section, Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN),

M. André MUHLBERGER

Commissaire divisionnaire, Directeur de la Sûreté publique

MONTENEGRO

Ms Vesna RATKOVIC (Head of delegation)

Director, Directorate for Anti-Corruption Initiative

Mr Dusan DRAKIC

Advisor, Directorate for Anti-Corruption Initiative

NETHERLANDS / PAYS-BAS

Ms Anna LODEWEGES
Senior Policy Advisor, Ministry of Justice

NORWAY / NORVEGE

Mr Atle ROALDSØY (Head of delegation)
Senior Adviser, Ministry of Justice, Police Department

POLAND / POLOGNE

Ms Anna WADOWIARZ-PELC
National Prosecutor's Office, Bureau of International Legal Cooperation, Ministry of Justice

PORTUGAL

Mme Adriana BARRERIOS
Direction Générale de la Politique de la Justice, Ministère de la Justice

Mr José TORRES CAMPOS
Former Secretary of State for Industry and Energy

Mr Paulo PINTO DE ALBUQUERQUE
Professor of Law, College of Law of Illinois

ROMANIA / ROUMANIE

Mr Radu BUICA
Counsellor to the Romanian State Secretary of Justice, Ministry of Justice

RUSSIAN FEDERATION / FEDERATION DE RUSSIE

Mr Aleksandr BUKSMAN (Head of delegation)
First Deputy Prosecutor General, Prosecutor General's Office

Mr Oleg PLOKHOI
Deputy Head, Human resources and government awards department, Administration of the President

Mr Aslan YUSUFOV
Deputy Head of Section of supervision over implementation of anti-corruption legislation
Prosecutor General's Office

Mr Andrei ILYIN
Deputy Head of Section, Office of the Representative of the Russian Federation at the European Court of Human Rights, Ministry of Justice

Mr Anton TRONIN
Consultant à l'Administration du Président de la Fédération

Mr Konstantin KOSORUKOV
Deputy to the Permanent Representative of the Russian Federation to the Council of Europe

REPUBLIC OF SERBIA / REPUBLIQUE DE SERBIE

Mr Slobodan BOSKOVIC
Legal Consultant, Ministry of Justice

SLOVAK REPUBLIC / REPUBLIQUE SLOVAQUE

Mr Vladimir TURAN
Head of Department on Fight Organised Crime, Terrorism and International Crime, Special Prosecution Office of the General Prosecution Office

SLOVENIA / SLOVENIE

Mr Drago KOS
President of GRECO / Président du GRECO
Chairman, Commission for the Prevention of Corruption

Ms Sandra A. BLAGOJEVIC
Advisor, Commission for the Prevention of Corruption

SPAIN / ESPAGNE

Mr Francisco Javier SANABRIA (Head of delegation)
Deputy Director General for Justice Affairs in the European Union and International Organisations
Ministry of Justice

Mr Rafael VAILLO
Technical Counsellor, D.G. for International Cooperation , Ministry of Justice

Mr José Santiago TORRES PRIETO

Mr Alejandro LUZÓN

Mr Jose Guillermo CASTRO DE CON

Mr Angel SANZ MERINO

Ms Ana Cristina LOPEZ

Mr Jerónimo HERNÁNDEZ

SWEDEN / SUEDE

Ms Ylva REISNER
Stagiaire, Permanent Representation of Sweden to the Council of Europe

SWITZERLAND / SUISSE

M Ernst GNAEGI (Chef de délégation)
Chef de l'unité du droit pénal international, Office fédéral de la Justice

M Olivier GONIN
Collaborateur scientifique, Unité du droit pénal international, Office fédéral de la justice

"THE FORMER YUGOSLAV REPUBLIC OF MACEDONIA" / "L'EX-RÉPUBLIQUE YOUGOSLAVE DE MACÉDOINE"

Ms Slagjana TASEVA (Head of delegation)
Professor in Criminal Law, Dean of the Faculty of Law, "First Private University, European University - the Republic of Macedonia"

TURKEY / TURQUIE

Mr Mete DEMIRCI
Inspector, Prime Minister's Office

Mr Ahmet ULUTAS
Judge, Ministry of Justice

UKRAINE

Mr Ruslan RIABOSHAPKA (Head of delegation)
Head of the Department of Legal Issues, Law Enforcement Activity and Fight against Crime
Ministry of Justice

Mr Mykhaylo BUROMENSKIY
President of the Institute of Humanitarian Research

Mr Andriy BOHDAN
Deputy Minister of Justice

Mr Yuriy SUHOV
Government Agent on anticorruption policy

Mr Mykhailo KOVAL
Representative of Ministry of Justice

Mr Olexandr PRYHOD'KO
Representative of General Prosecutor's Office

Mr Serhiy YAREMENKO,
Representative of Main Department of Civil Service

UNITED KINGDOM / ROYAUME-UNI

Mr Alastair BROWN
Advocate Depute, Crown Office

Mr Douglas STEWART
Senior Manager, Risk Services, Deloitte LLP

UNITED STATES OF AMERICA / ETATS-UNIS D'AMERIQUE

Mr Richard M. ROGERS (Head of delegation)
Senior Counsel to the Assistant Attorney General, Criminal Division, Department of Justice

**PRESIDENT OF THE STATUTORY COMMITTEE OF GRECO / PRÉSIDENT DU COMITÉ
STATUTAIRE DU GRECO**

Apologised / Excusé

**PARLIAMENTARY ASSEMBLY OF THE COUNCIL OF EUROPE / ASSEMBLEE
PARLEMENTAIRE DU CONSEIL DE L'EUROPE**

Apologised / Excusé

REPRESENTATIVE OF THE CDCJ / REPRÉSENTANT DU CDCJ

Apologised / Excusé

REPRESENTATIVE OF THE CDPC / REPRÉSENTANT DU CDPC

Apologised / Excusé

OBSERVER UNITED NATIONS – UNODC / OBSERVATEUR NATIONS UNIES – ONUDC

Apologised / Excusé

OBSERVER OECD / OBSERVATEUR OCDE

Apologised / Excusé

GRECO EVALUATION TEAMS / EQUIPES D'EVALUATION DU GRECO

**Third Round Evaluation Report on ALBANIA/
Rapport d'Evaluation du Troisième Cycle sur l'ALBANIE**

Theme I – Incriminations

Mrs Maria GAVOUNELI (Greece / Grèce)
Lecturer in International Law, Faculty of Law, University of Athens

Mr Georgi RUPCHEV (Bulgaria / Bulgarie) – **Apologised / Excusé**
Director of International Cooperation and European Integration, State Expert, Ministry of Justice

Theme II – Party Funding / Financement des partis politiques

Mr Nenad ZAKOŠEK (Croatia / Croatie) – **Apologised / Excusé**
Professor, Faculty of Political Science, University of Zagreb

Mr José TORRES CAMPOS (Portugal)
Former Secretary of State for Industry and Energy

M. Frank ENGEL (Luxembourg)
Juriste, Secrétaire de la fraction parlementaire du parti chrétien social (CSV)

**Third Round Evaluation Report on BELGIUM /
Rapport d'Évaluation du Troisième Cycle sur la BELGIQUE**

Theme I – Incriminations

M. André MUHLBERGER (Monaco)
Commissaire divisionnaire, Directeur de la Sûreté publique

Ms Cláudia SANTOS (Portugal) – **Apologised / Excusée**
Professeur Assistant, Faculté de Droit de l'Université de Coimbra

Theme II – Party Funding / Financement des partis politiques

M Richard GHEVONTIAN (France)
Professeur des Universités, Directeur de recherches au Groupe d'Études et de Recherches sur la Justice Constitutionnelle (G.E.R.J.C.), Directeur de l'Institut d'Études françaises pour Etudiants Etrangers

Mr Paulo PINTO DE ALBUQUERQUE (Portugal)
Professor of law, College of Law of Illinois

**Third Round Evaluation Report on SPAIN /
Rapport d'Évaluation du Troisième Cycle sur l'ESPAGNE**

Theme I – Incriminations

Mr Atle ROALDSØY (Norway / Norvège)
Senior Adviser, Ministry of Justice, Police Department

Mr Anton TRONIN (Russian Federation / Fédération de Russie)
Consultant à l'Administration du Président de la Fédération

Theme II – Party Funding / Financement des partis politiques

Mr Pietro RUSSO (Italy / Italie) - **Apologised / Excusé**
Magistrate, Supreme Audit Court

Mr Douglas STEWART (United Kingdom / Royaume-Uni)
Senior Manager, Risk Services, Deloitte LLP

M. Yves Marie DOUBLET (Consultant)
Directeur adjoint, Assemblée Nationale, Service des affaires juridiques

RAPPORTEURS

**Joint First and Second Round Compliance Report /
Rapport de Conformité des Premier et Deuxième Cycles conjoints**

UKRAINE

Mr Philippos KOMODROMOS (Cyprus / Chypre)

Mr Alastair BROWN (United Kingdom / Royaume-Uni)

**Second Round Compliance Report /
Rapport de Conformité du Deuxième Cycle**

GEORGIA / GEORGIE

Mr Atle ROALDSØY (Norway / Norvège)

Ms Violeta ZEPPA-PRIEDITE (Latvia / Lettonie)

EXCHANGE OF VIEWS WITH / ECHANGE DE VUES AVEC

Mr François VINCKE, Chair, Commission on Anti-Corruption, International Chamber of Commerce /
Président, Commission Anti-Corruption, Chambre Internationale de Commerce

COUNCIL OF EUROPE SECRETARIAT / SECRETARIAT DU CONSEIL DE L'EUROPE

Mr Wolfgang RAU, Executive Secretary of GRECO / *Secrétaire Exécutif du GRECO*

Assistant / Assistante

Ms Elspeth REILLY, Personal Assistant to the Executive Secretary / *Assistante Particulière du Secrétaire Exécutif*

Administrative Officers / Administrateurs

Mr Björn JANSON

M. Christophe SPECKBACHER

Ms Laura SANZ-LEVIA

Ms Tania VAN DIJK

Mr Michael JANSSEN, ☎ +33 3 88 41 20 55 - ✉ michael.janssen@coe.int

Central Office / Bureau Central

Ms Penelope PREBENSEN, Administrative Assistant / *Assistante Administrative*

Mme Laure HEIM, Assistant / *Assistante*

Mme Marie-Rose PREVOST, Assistant / *Assistante*

Webmaster

Ms Simona GHITA, Directorate General of Human Rights and Legal Affairs / *Direction générale des droits de l'Homme et des affaires juridiques*

Mme Marie-Rose PREVOST, GRECO

INTERPRETERS / INTERPRETES

Mme Sally BAILEY

Mme Chloé CHENETIER

Mme Marie-Christine FARCOT

Mme Isabelle MARCHINI

APPENDIX II

AGENDA

1. Opening of the meeting / *Ouverture de la réunion* - **09h30**
 2. Adoption of the agenda / *Adoption de l'ordre du jour*
 3. Information from the President, Delegations and the Executive Secretary (including on Bureau 48) / *Information du Président, des Délégations et du Secrétaire Exécutif (y compris sur Bureau 48)*
 4. **First reading** of draft Third Round Evaluation Reports / **Première lecture** de projets de Rapports d'Évaluation du Troisième Cycle:
 - **Spain / Espagne** (Monday / *lundi*)
 - **Belgium / Belgique** (Tuesday / *mardi*)
 - **Albania / Albanie** (Theme II: Wednesday / *mercredi*; Theme I: Thursday / *jeudi*)
 5. Examination and adoption of the Joint First and Second Round Compliance Report on **Ukraine** / *Examen et adoption du Rapport de Conformité des Premier et Deuxième Cycles conjoints sur l'Ukraine*
 6. Examination and adoption of the Second Round Compliance Report on **Georgia** / *Examen et adoption du Rapport de Conformité du Deuxième Cycle sur la Géorgie*
 7. Examination and adoption of the Addenda to the Second Round Compliance Reports on **Belgium, Denmark, France** and **Slovenia** (2nd Addendum) / *Examen et adoption des Addenda aux Rapports de Conformité du Deuxième Cycle sur la Belgique, le Danemark, la France et la Slovénie* (2^{ème} Addendum)
8. Exchange of views with Mr François VINCKE, Chair of the Anti-Corruption Commission, International Chamber of Commerce – **Wednesday**, 13 May, 11h00 / *Echange de vues avec M. François VINCKE, Président de la Commission anti-corruption, Chambre Internationale du Commerce* – **mercredi**, 13 mai, 11h00
9. **Second reading** and adoption of the draft Third Round Evaluation Reports on **Albania, Belgium** and **Spain** (Friday) / **Deuxième lecture** et adoption des projets de Rapport d'Évaluation du Troisième Cycle sur l'**Albanie**, la **Belgique** et l'**Espagne** (Vendredi)
 10. Miscellaneous / *Divers*
 11. Adoption of decisions / *Adoption des décisions*
 12. Dates of next meetings / *Dates des prochaines réunions*