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FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in
central governments (top executive functions) and
law enforcement agencies

SECOND COMPLIANCE REPORT

LITHUANIA



Adopted by GRECO
at its 102nd Plenary meeting (Strasbourg, 23-27 March 2026)

I. INTRODUCTION

1. The Fifth GRECO Evaluation Round concerns “Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies”.
2. This Second Compliance Report assesses the measures taken by the authorities of Lithuania to implement the recommendations made in the [Fifth Round Evaluation Report](#) on Lithuania which was adopted by GRECO at its 89th Plenary meeting (3 December 2021) and made public on 25 April 2022, following authorisation by Lithuania. The corresponding [Compliance Report](#) was adopted by GRECO at its 96th Plenary meeting (22 March 2024) and made public on 14 May 2024, following authorisation by Lithuania.
3. As required by GRECO’s Rules of Procedure,¹ the authorities of Lithuania submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 30 September 2025 and, along with the additional information received on 28 October 2025, served as a basis for this report.
4. GRECO selected Latvia (in respect of top executive functions in central governments) and Bosnia-Herzegovina (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed, Viktors LAIZĀNS on behalf of Latvia and Adnan DLAKIĆ for Bosnia-Herzegovina – were assisted by the GRECO Secretariat in drawing up this report.

II. ANALYSIS

5. GRECO made 17 recommendations to Lithuania in its Evaluation Report. In the Compliance Report, GRECO concluded that recommendations ix, x, xv and xvii had been implemented satisfactorily, or dealt with in a satisfactory manner, recommendations i-iv, vi, xii and xiii had been partly implemented and recommendations v, vii, viii, xi, xiv and xvi had not been implemented. Compliance with these recommendations is dealt with below.

Preventing corruption and promoting integrity in central governments (top executive functions)

Recommendation i

6. *GRECO recommended that the Code of State Politicians’ Conduct be complemented with illustrative guidance for its implementation regarding conflicts of interest and other integrity- related matters (e.g., preventing and managing conflicts of interest, contacts with lobbyists and other third parties, post-employment restrictions, etc.) and (ii) that similar documents and guidance be established in respect of civil servants of political confidence and the President of the Republic.*

¹ The compliance procedure for the Fifth Evaluation Round is governed by GRECO’s Rules of Procedure as amended. See Rule 31 revised bis and Rule 32 revised bis.

7. GRECO recalls that this recommendation was partly implemented in the Compliance Report. With regard to the first part, GRECO noted the adoption of the Methodological Recommendations to assess compliance with the Code of Conduct for State Politicians and additional efforts to raise public officials' awareness of conflicts of interest, gifts and post-employment restrictions. However, the Recommendations were targeted mainly at mayors and municipal counsellors, and no guiding document was put in place for persons entrusted with top executive functions (PTEFs). As to the second part, the adoption of Rules of Anti-Corruption Conduct and Ethics of the Chancellery of the President was welcomed, but a guiding document regarding ethics and integrity applicable to the President was still lacking.
8. The Lithuanian authorities now report that, in relation to the first part of the recommendation, the Chief Official Ethics Commission (COEC) continued expanding the guidance for the implementation of the Code of Conduct for State Politicians. In addition to the Methodological Recommendations and information leaflets, the COEC prepared explanations of the principles of conduct outlined in the Code (impartiality, selflessness, integrity, exemplary behaviour, transparency, and openness). The purpose of this latter document² is providing guidance on the application of the Code in practice and ensuring observance by state politicians in various situations. The authorities specify that the explanations developed by the COEC for the principles contained in the Code of Conduct of State Politicians are suitable for guiding daily professional conduct and may therefore be applied across the public sector to ensure consistent standards of ethical behaviour in the performance of public duties. The document provides concrete examples and can serve as practical instrument to assist public sector institutions in resolving real-life questions concerning ethics, integrity, and conflicts of interest. Civil servants, including those appointed on the basis of political confidence, are required to act in accordance with the codes and rules of anti-corruption that every public institution is expected to adopt as per the Anti-Corruption Law.
9. As to the second part, the authorities note that while the Code of Conduct for State Politicians does not formally apply to the President, the above-mentioned explanatory guidance refers to "state politicians" as defined in law,³ which expressly includes the President. Therefore, the authorities take the view that the standards and expectations of conduct promoted by the guidance also extend to the President. In addition, the authorities indicate that in the course of preparation of this Second Compliance Report, the relevant institutions, including the Office of the President, have been consulted on the relevant recommendations for their review and comments and confirm that the Office of the President has been alerted to the explanatory guidance to the Code of Conduct for State Politicians, published on the COEC's website.

² More information can be found on the [COEC website](https://vtek.lt/kontroliuojantiems-interesu-derinama-ir-deklaravima/savivaldybiu-tarybu-etikos-komisijos/) [in Lithuanian], accessible via the following link: <https://vtek.lt/kontroliuojantiems-interesu-derinama-ir-deklaravima/savivaldybiu-tarybu-etikos-komisijos/>

³ Article 2(1) of the Code of Conduct for State Politicians.

10. In addition, the authorities refer to several online training programmes on integrity related issues,⁴ which complement the COEC's guidance and support the practical implementation of ethical standards for state politicians, civil servants of political confidence, and other public sector employees. The authorities also indicate that the COEC continuously encourages (by official letters) public employees, including ministers, heads of public institutions and civil servants of political confidence, to complete these training courses and recommends that compliance officers adjust and improve training programmes, as necessary, to better meet institutional needs and address evolving institutional requirements effectively. Finally, the authorities report that the COEC has set up a section "Consultation Bank" on its website, which contains anonymised opinions and interpretations of the COEC on issues of integrity, conflicts of interest, lobbying activities, post-employment restrictions etc.
11. GRECO takes note of the information provided by the authorities. It welcomes the expansion of the guidance for the implementation of the Code of Conduct for State Politicians to support its application in practice, and their availability on the COEC website. Further, GRECO notes that dedicated online training courses have been made available on these matters, and that the COEC is taking steps to encourage public employees in ministries and other institutions in the executive to follow these courses. In light of these measures, GRECO is satisfied that the requirements of the first part of this recommendation have been met. As to the second part, GRECO takes note of the authorities' interpretation that the guidance for the implementation of the Code of Conduct is also applicable to the President, as he is defined as "state politician". Recalling that the Rules of Anti-Corruption Conduct and Ethics of the Office of the President already in place, an acknowledgement, or other form of engagement from the President to follow the guidance would demonstrate that the President is indeed aware of the Code and has undertaken to observe it.
12. GRECO concludes that recommendation i has been implemented satisfactorily.

Recommendation ii
13. *GRECO recommended that (i) systematic briefing on integrity issues be imparted to all persons with top executive functions upon taking up their positions and at regular intervals and; (ii) confidential counselling on ethical issues be accessible at government/ministry level and at the President's Office.*
14. GRECO recalls that this recommendation was partly implemented in the Compliance Report. With regard to the first part of the recommendation, GRECO noted new training and awareness raising measures taken by the Chief Official Ethics Commission (COEC), and the authorities' intention to duly inform all newly employed public officials of the

⁴ More specifically, an online training course entitled "Identifying and Managing Conflicts of Interest", which provides practical examples and recommendations on how to recognise conflicts of interest in official duties and how to avoid such situations; an online training course "Lobbying Activities", designed to illustrate the provisions of the Law on Lobbying Activities, containing criteria for identifying lobbying and outlining appropriate actions in this regard; an online training course "Declaration of Private Interests", intended for all employees in the public sector, required to declare their private interests; an online course "Post-Service Restrictions", which discusses the restrictions applicable to public employees upon leaving public service and provides guidelines on how to comply with them.

integrity standards and conduct expected. However, no information had been received on regular briefings on integrity matters for PTEFs already in office. As to the second part, GRECO took note that the Compliance Department had been set up within the COEC to provide methodological guidance and advice on anti-corruption legislation. However, it remained not clear whether the advice provided was confidential.

15. The Lithuanian authorities, with regard to the first part of the recommendation, now report that, in addition to the online training courses implemented by the COEC, the Public Governance Agency prepared online courses for senior-level executives on conflict-of-interest management and lobbying activities.⁵ These courses cover topics such as conflicts of interest, lobbying activities, declaration of private interests, and post-employment restrictions. Training activities for heads of institutions⁶ are organised on the basis of individual development plans, prepared for the entire duration of their office. The Public Governance Agency keeps the heads of institutions informed about updated training opportunities and encourages continuous professional development throughout the entire period of public service. According to the authorities, the COEC has so far provided in-person transparency trainings/discussions to political teams of the ministries, having reached a total of 65 PTEFs. Moreover, the COEC maintains continuous cooperation with compliance officers across ministries and other public sector institutions, ensuring the systematic transfer of the COEC's best practices to their respective institutions.⁷ The authorities take the view that this approach ensures PTEFs to be systematically briefed on integrity issues and supported in applying ethical standards in practice.
16. Further, in 2024, the COEC sent invitations to the Government Office and the institutions accountable to the Government to respond to a compliance test, containing questions designed for leaders and compliance officers in these institutions.⁸ The authorities indicate that all ministries, the Government Office, other public institutions and state-owned enterprises have completed the tests. The test responses informed the assessment of the institutions' compliance with the Law on the Adjustment of Public and Private Interests (hereafter – Law on the Adjustment of Interests) and the Law on Lobbying Activities, and the formulation of recommendations for improving practices

⁵ The training courses developed by the Public Governance Agency (responsible for organising the development of the heads of institutions) are hosted and accessible through the Agency's dedicated e-learning platform. These include a Leadership Academy, a Mentorship Programme, networking activities for the head of the institution, and managers' clubs.

⁶ These include heads of institutions, as well as heads of agencies appointed by Parliament, the President of the Republic, or the Government, who hold the status of state officials, except officials appointed on the basis of political (personal) trust.

⁷ In particular, the COEC regularly organises "Transparency Breakfasts" bringing together compliance officers and other relevant stakeholders to conduct structured discussions on transparency-related challenges. This allows the COEC to effectively disseminate its expertise to the officials who, within their institutions, brief and support political teams in upholding high standards of integrity and transparency. According to the authorities, the COEC conducted meetings and briefings on these matters for a total of 328 public officials from various state institutions.

⁸ The organisational compliance assessment test, consisting of two main parts, aims at gathering information on and assessing the measures taken by public institutions to conform to the requirements of the Law on the Coordination of Public and Private Interests and the Law on Lobbying Activities. In addition, the test includes two additional components, containing questions for the head of the institution, and compliance officer, respectively.

with regard to controls of declarations of interests and lobbying, as well as managing conflicts of interest.⁹

17. As to the second part of the recommendation, the authorities submit that the COEC and its staff continue to provide confidential¹⁰ individual consultations on ethics and integrity matters, as needed. Thus, a total of 23 consultations on ethics and integrity have been provided to PTEFs in the Government.¹¹ The COEC consultations are also available upon request to the Office of the President.
18. GRECO takes note of the information submitted by the authorities. It notes that the COEC continues offering training opportunities on ethics and integrity issues to PTEFs, and that new online training courses have been designed and made available. GRECO also notes with interest the compliance test addressed to the Government Office and ministries as means to raise awareness of integrity and identify any areas where improvements can be recommended. GRECO is also satisfied that PTEFs, including those already in office, appear to have access to consultations on ethics and integrity issues from the COEC. These developments respond to the first part of this recommendation and are therefore to be welcomed. As to the second part, GRECO takes note that consultations on integrity matters, provided by the COEC, are confidential, and all bodies in the executive may request it. This part of the recommendation has therefore been complied with as well.
19. GRECO concludes that recommendation ii has been implemented satisfactorily.

Recommendation iii

20. *GRECO recommended that complementary measures be taken to ensure that adequate timelines for public consultations on government draft legislative initiatives are foreseen and respected in practice.*
21. It is recalled that this recommendation was partly implemented in the Compliance Report. Some steps were taken to provide for adequate timelines for public consultations on government draft legislation (e.g. a requirement to substantiate the urgency of adopting draft laws not included in the Government legislative programme, and not to examine draft laws on which no public consultations have been conducted). Further, the annual monitoring of public consultations carried out by the Office of the Government, the various activities for public officials to promote public consultations, and the draft recommendations of the Ministry of Justice on adequate time limits for

⁹ In addition, in 2024 and 2025, the COEC organised conferences on the topics of interest alignment and lobbying activities, which brought together heads of state and municipal institutions, as well as compliance officers, who shared their experiences in managing conflict-of-interest situations, discussed trends in lobbying activities, and presented insights and good practice examples.

¹⁰ The authorities point out that Article 9 of the Law on the Chief Official Ethics Commission establishes that COEC members and Secretariat employees are obligated to protect state, service-related, and other legally protected secrets, as well as confidential information acquired in the course of their official duties. Additionally, they are required to sign a commitment to safeguard confidential information.

¹¹ Ministry of Agriculture, Ministry of the Economy and Innovation, Ministry of Social Security and Labour, Ministry of National Defence, Ministry of Foreign Affairs, Ministry of Environmental Protection, Ministry of Culture, Ministry of Health, and Ministry of the Interior.

public consultations were welcomed. However, the rules on these matters, expected to be approved by the Government, as well as the Ministry of Justice recommendations, had not been finalised at the time, and no examples of their application in practice were available.

22. The Lithuanian authorities now submit that on 3 May 2024, the Government approved the Rules for the coordination of projects of normative legal acts of ministers, institutions, and other bodies subordinate to the Government. These Rules introduce uniform terms and conditions for legislative and public consultation for all entities concerned. In particular, they establish a mandatory public consultation for the coordination of draft legal acts and the duty to evaluate comments received, and set out deadlines¹² for all stages of public consultation. Similar provisions have been introduced through the amendments of 3 May 2024 to the Government Rules of Procedure.¹³ By way of example, the authorities refer to 15 different legal acts adopted/initiated by the line ministries in the course of February 2026, which have been accessible for public consultation for the duration of 10 to 13 days.
23. Furthermore, the Ministry of Justice prepared the Methodological Recommendations for legislation, emphasising the importance of public consultations. The Recommendations require providing sufficient deadlines for all stages of consultation with the public, including preparation for consultations, introducing proposed legislation to the public, discussing consultation results, etc. The Ministry also has a role in the preparation of draft Government legal acts through providing legal assessment of such drafts. The assessment includes evaluating whether the draft legislation provides for sufficient coordination deadlines.
24. In addition, in September 2023 the Government approved the Open Government Plan for 2024–2025, which includes among the planned actions *“Enabling and ensuring the development of the co-creation process”*. To meet this objective, the public consultation methodology has been updated and expanded with the introduction of additional public engagement phases (informing, consulting, co-creating, and empowering), a public engagement training platform entitled *“Learning Openness”* has been created,¹⁴ and a database of good public engagement practices is being developed on the same platform.
25. Finally, the authorities submit that a training module for civil servants entitled *“The Code of Democracy”* is being implemented with the aim to introduce the benefits of public engagement and improve practical knowledge in this area. Four training sessions were planned under this module for 2025, three of which, *“The Code of Democracy: Lessons*

¹² As per paragraph 17 of the Rules, *“a coordination period of no shorter than 10 working days shall be provided for the submission of conclusions of interested institutions and comments and proposals of interested persons on draft legal acts, and when large (10 or more pages) and (or) complex draft legal acts (establishing new legal regulation or substantially amending it) are submitted, a coordination period of no shorter than 12 working days shall be provided, <...> The specific coordination period (no shorter than the minimum coordination period) shall be determined after assessing the actual scope and complexity of the project”*.

¹³ Notably, the amendments now establish harmonised deadlines for coordination of draft legislation emanating from the Government accountable institutions, while ensuring a reasonable and consistent period for relevant bodies and the public to review draft legislation and provide comments.

¹⁴ Accessible via the following link (in Lithuanian): <https://epilietis.lrv.lt/lt/mokomes-atvirumo/>

in Public Engagement” and *“Asking the Public: How to Properly Collect and Easily Analyse Data?”* and *“Design Thinking and Public Engagement in Public Governance Processes”* have already taken place (on 14 March, 31 July and 15 October 2025, respectively). The authorities also report other awareness-raising activities¹⁵ which took place in the course of 2024-2025, and indicate that further three training sessions under this module will be conducted in the course of 2026.

26. GRECO takes note of the information provided. It welcomes the adoption of harmonised rules applicable to ministries, government bodies and institutions regarding timelines for public consultations and inter-agency coordination in the process of adoption of draft legislation. GRECO also notes that the Methodological Recommendations, adopted by the Ministry of Justice, underline the importance of sufficient time limits at different stages of public consultations on draft legislation, which appears to be followed in practice. Therefore, GRECO considers that requirements of this recommendation have therefore been complied with and encourages the authorities to continue applying these provisions in practice.

27. GRECO concludes that recommendation iii has been implemented satisfactorily.

Recommendation iv

28. *GRECO recommended (i) making more information publicly available regarding meetings (formal and informal) held by ministers and civil servants of political confidence with third parties, including lobbyists, and that such entries contain a sufficient amount of detail on the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion and (ii) that an independent assessment of the implementation of the Law on Lobbying Activities be conducted and the law is amended as appropriate in view of the results of this assessment.*

29. GRECO recalls that this recommendation was partly implemented in the Compliance Report. In respect of the first part, GRECO noted the steps taken to include the necessary information in the reports on lobbying activity, received by the COEC, acknowledged the information leaflet as a valuable instrument to raise awareness on the matter, and considered the increasing number reports on lobbying activity as encouraging. However, the examples provided by the authorities were limited to general information, not indicating details of meetings, or participants. As to the second part, GRECO pointed out that an independent assessment of the implementation of the Law on Lobbying Activities could also evaluate practical steps taken for its implementation and called upon the authorities to carry out this assessment, as required by the recommendation.

¹⁵ More specifically, in May 2024, recommendations were provided to ministries following the assessment of consultation maturity; in September 2024, guidelines were prepared for ministries regarding the requirements for publishing public consultations on the updated e.Citizen online platform; in November 2024 training was organised in cooperation with the Ministry of Justice for public sector representatives on inclusive law-making and public consultations; in January 2025, recommendations on public engagement in the preparation of the Plan for the Implementation of the Provisions of the Nineteenth Programme of the Government were developed and presented to ministries; innovative methods of participatory and deliberative democracy were introduced to representatives from various ministries.

30. The Lithuanian authorities reiterate the relevant provisions¹⁶ of the Law on Lobbying Activities setting out rules on disclosure of contacts of high-level politicians and officials with lobbyists, which do not specify the level of detail of information to be disclosed. Further, they again refer to Government Resolution No. 480 of 18 April 2003 “*On the Approval of General Requirements for the Websites and Mobile Applications of State and Municipal Institutions and Agencies*”, which requires that agendas include the purpose, time and participants of meetings. The authorities provide several examples of recent declarations submitted by PTEFs about lobbying in the context of government decision-making, which indicate the official approached, the event/activity where lobbying took place, the person engaged in lobbying, as well as subject matters. In addition, the authorities report that a dedicated working group has been established by the order of the Chair of the COEC to prepare proposals for the improvement of the Law on Lobbying Activities.¹⁷
31. With regard to the second part of the recommendation, the authorities report that in 2025, the COEC released a comprehensive study¹⁸ entitled “*Trends in the Development of Lobbying Activities in Lithuania 2021–2024*”. Key insights from the analysis suggest that since the entry into force of the revised Law on Lobbying (1 January 2021), the number of registered lobbyists tripled, but the proportion of those actively engaged in lobbying (on the basis of declarations submitted) has been steadily decreasing. The study attributes this trend to more accurate reporting and a higher awareness of what constitutes lobbying. The study also suggests that lobbying activities are most often carried out by legal entities (business associations, confederations) acting in the interests of their members, and the primary target of lobbying is Parliament (78%), followed by the Government¹⁹ and ministries.
32. The authorities take the view that while this study does not constitute a formal ex-post evaluation, it does provide a comprehensive, data-driven overview, which could inform future amendments to the Law on Lobbying. Further, the information collected during the preparation of the study has been transferred to the Special Investigation Service which, in 2025, carried out an analytical anti-corruption investigation of lobbying regulation and practice in Lithuania. This analytical document formed the basis of proposals submitted by the Special Investigation Service to the Ministry of Justice and the COEC for legislative and practical improvements with regard to transparency of lobbying activity in Lithuania. Notably, these proposals include establishing an obligation for public institutions to disclose meetings with lobbyists and influencers and any proposals made, ensuring that proposals submitted by registered lobbyists and influencers for legislation are linked to specific legislative changes in state information resources, reflecting the obligation to publish the agendas of state politicians and civil

¹⁶ Namely, they refer to Article 5(5) of the Law on Lobbying, requiring high officials to publicly disclose their agendas on the websites of their respective institutions.

¹⁷ The composition of the working group includes representatives of the COEC, registered lobbyists, and representatives of non-governmental organisations. The working group currently discusses the implementation in Lithuania of the European Union Directive on the Defence of Democracy, as the COEC has been assigned a new function under this Directive.

¹⁸ Accessible via the following link (in Lithuanian): <https://vtek.lt/veiklos-sritys/veiklos-ataskaitos/>

¹⁹ The study reveals that, with regards to the Government, lobbying is mainly directed at legislation regulating the general activities of the Government, as well as healthcare, land use, taxation, and construction.

servants in the Code of Conduct for State Politicians, and providing for an appropriate supervisory mechanism. Finally, the authorities refer to the Constitutional Court ruling No. KT34-N9/2025 of 3 July 2025,²⁰ where the Court concluded that the provisions of the Law on Lobbying, stipulating that the expression of an opinion on lawmaking by a legal person does not constitute lobbying activity,²¹ except where such an opinion is expressed by a legal person representing or uniting legal persons pursuing business objectives, or by associations uniting such legal persons, would be in line with the Constitution.²²

33. GRECO takes note of the information submitted by the authorities. Regarding the first part of the recommendation, no new legislative measures have been taken to require a more detailed reporting of lobbying. However, GRECO notes with satisfaction the recent practical examples of lobbying declarations of PTEFs, which demonstrate that such declarations now contain a greater level of detail of contacts with lobbyists, including subject matters, and PTEFs who were approached for lobbying. GRECO encourages the authorities to continue improving the legislative and institutional framework to strengthen transparency of lobbying with regard to PTEFs. Based on the recent examples and developments, GRECO considers the first part of the recommendation to have been dealt with in a satisfactory manner. As to the second part, GRECO notes with interest the findings of the study, carried out by the COEC, and the outcomes of the analysis carried out by the Special Investigation Service. In particular, GRECO points to one of the conclusions that state politicians and civil servants should be required to provide more details of their contacts with persons engaged in lobbying, with goes in line with this recommendation. Both the study, as well as the analysis, provide valuable insights into the matter and could inform any necessary amendments to the Law on Lobbying. Therefore, GRECO considers this part of the recommendation has been dealt with in a satisfactory manner.

34. GRECO concludes that recommendation iv has been dealt with in a satisfactory manner.

Recommendation v

35. *GRECO recommended establishing a more robust set of rules together with appropriate practical guidance on gifts and other benefits for persons entrusted with top executive functions, including the obligation of reporting them and informing the public.*

²⁰ A news article regarding the ruling is accessible via the following link: <https://lrkt.lt/en/about-the-court/news/1342/the-provision-of-the-law-on-lobbying-activities-under-which-an-opinion-on-lawmaking-expressed-by-legal-persons-representing-the-business-interests-of-other-legal-persons-is-considered-lobbying-activity-is-not-in-conflict-with-the-constitution:782>

²¹ In this ruling, the Constitutional Court also stated that legal persons have the right to publicly express their own opinion on lawmaking (but not that of persons they represent), without this being considered as lobbying. Finally, the Constitutional Court justified the exception accorded to non-governmental organisations under the Law on Lobbying, according to which the activities of public legal persons directly specified in special laws, which satisfy the public interest, are not considered lobbying activities.

²² In particular, the Court held that the impugned legal regulation pursues constitutionally important objectives – to ensure open and transparent law-making procedure, to prevent corruption, and, inter alia, to avoid possible abuse of lobbying activities, also that such a legal regulation does not impose a disproportionate restriction on constitutional freedoms, such as freedom of information, freedom to have convictions and freely express them, and freedom of association, as well as that such a legal regulation complies with the constitutional principle of a state under the rule of law.

36. It is recalled that this recommendation was not implemented in the Compliance Report. GRECO noted that the restrictions and acceptance of gifts and services were still mainly governed by the COEC Guidance of 2020, already in place at the time of the adoption of the Evaluation Report. Nonetheless, the authorities acknowledged the need for further improvements, and some initiatives were in the pipeline to clarify the legislative provisions regarding gifts.
37. The Lithuanian authorities now report that on 18 June 2025, the COEC integrated the gift registration function into the Register of Private Interests. This tool provides a centralised, digital platform accessible to both compliance officers and individuals working in the public sector, ensuring a uniform standard, traceability, and effective oversight of the reporting obligation. Further, the authorities submit that the Special Investigation Service adopted the Procedure for the transfer, evaluation, registration, storage and exhibition of gifts²³ received by the institution under international protocol or tradition, as well as representation gifts, which also provides the form of the Gift Valuation Act. Along with these measures, e-learning tools have also been prepared on conflicts of interest and gift policy.²⁴ Finally, it is reported that the Special Investigation Service approved the procedure for taking action in the event of receiving illegal remuneration²⁵, which has aims at identifying, managing and controlling cases of illegal remuneration received, and preventing possible active or passive bribery, or other illegal behaviour.
38. The authorities conclude that a multi-layered, integrated gift management system is being implemented in Lithuania, containing rules, practical guidelines, a reporting obligation on gifts, and measures to promote public awareness. The reporting system is implemented through two levels: on the one hand, a general prohibition on the acceptance of gifts related to official duties is in place with respect to all officials and civil servants (Article 6.470 (5) of the Civil Code); on the other hand, limited exceptions are allowed under the Law on the Adjustment of Interests, such as gifts received under protocol, cultural traditions, or for representational purposes, with a value limit of €150. The authorities indicate that any gifts exceeding this amount become state property. On the basis of these legal acts, a uniform practice has been established across the public sector, with many institutions applying a “zero gift policy”, requiring all received gifts to be registered and assessed. To harmonise practices, in 2020, the Special Investigation Service approved model descriptions for the Registers of Received Gifts and Unlawful Remuneration, which now ensure that all institutions follow consistent procedures in this regard.
39. GRECO takes note of the information submitted by the authorities. It notes that harmonised rules and procedures have been put in place to register gifts received by officials in the public sector, including PTEFs. GRECO also welcomes the guidance

²³ Accessible, in Lithuanian, via the following link (fifth document from the section “Rekomendacijos ir pavyzdiniai teisės aktai”): <https://stt.lt/korupcijos-prevencija/metodine-ir-mokomoji-medziaga/7750>

²⁴ Accessible on the e-learning platform via the following link: <https://emokymai.stt.lt/>

²⁵ Accessible, in Lithuanian, via the following link (sixth document, section “Rekomendacijos ir pavyzdiniai teisės aktai”): <https://stt.lt/korupcijos-prevencija/metodine-ir-mokomoji-medziaga/7750>

documents, adopted by the Special Investigation Service, to facilitate declaring, valuating, registering and handling of gifts received.

40. GRECO concludes that recommendation v has been implemented satisfactorily.

Recommendation vi

41. *GRECO recommended that the declarations of private interests of persons entrusted with top executive functions be subject to regular substantive control and that the Chief Official Ethics Commission be provided with adequate resources for this task.*
42. GRECO recalls that this recommendation was partly implemented in the Compliance Report. GRECO welcomed the formalisation of periodic verifications by the COEC of declarations of private interests by most PTEFs, which were to be carried out in the course of 2024. However, no information was provided as regards the number of PTEFs whose declarations had already been verified, or whether such verifications would be carried out annually. GRECO was also not informed at that time of any additional resources allocated to the COEC to perform this new task in an efficient manner.
43. The Lithuanian authorities now report that the COEC conducts checks²⁶ of private interest declarations submitted by high-level officials (ministers, vice-ministers, heads of agencies, etc.) when they assume office, for example, during the formation of a new Government. During their term of office, regular verifications of PTEFs' private interest declarations are carried out by compliance officers in respective public institutions. In addition, the COEC also conducts verifications if it becomes known (through reports provided to the COEC, or information in the media) that not all data may have been disclosed. In such cases, the COEC may request rectifying the declaration and, should the individual fail to comply with this request, may subsequently initiate an investigation. Further, the authorities submit that in 2025, owing to its limited human resources, the COEC opted for a new, decentralised model, based on cooperation agreements already concluded with 93 public sector institutions (including with 9 out of 14 ministries, and 26 other institutions subordinate to Government or respective ministries).²⁷ This decentralised model of checks is implemented through compliance officers²⁸ appointed by public institutions, which must also meet minimum maturity criteria.²⁹ The authorities indicate that this arrangement ensures checks of private

²⁶ On the basis of the Order No. T-24, issued by the Chair of the COEC on 13 September 2023.

²⁷ In the process of implementation of the decentralised model of verification of declarations, the role of the COEC consists of concluding cooperation agreements with institutions, providing methodological guidance on how such verifications should be conducted, granting necessary access rights, and offering other forms of support for ensuring lawful, effective and consistent implementation of the verification process.

²⁸ Compliance officers have access to the internal portal of the Register of Private Interests and are therefore to independently verify declarations of their respective officials (employees), compare them with data from other registers, and manage risks of conflicts of interest. The purposes of the Register of Private Interests include the submission of private interest declarations, monitoring and management of conflict-of-interest risks, as well as the prevention of conflicts of interest. The functionalities of this Register are continuously reviewed to maintain its effective functioning for these purposes.

²⁹ The minimum maturity criteria require that the institution has formally designated a compliance officer, authorised to access and operate the Private Interests Register to ensure the institution's capacity to verify, process, and manage private interest declaration data in accordance with the applicable legal framework.

interest declarations at the institutional level, while reducing the administrative burden on the COEC, allowing it to focus on systemic and high-risk cases.

44. GRECO takes note of the information provided by the authorities. It notes with interest that the system of verifications of declarations of private interests, covering senior officials in the executive, has been expanded, and that primary responsibility for these verifications has been delegated to compliance officers in ministries and other public bodies. While this solution appears efficient, the COEC only assumes responsibility with regard to ensuring accuracy of PTEFs' private interest declarations, detecting breaches and taking action only when it becomes aware that incomplete information has been submitted, or declaratory obligations may have been breached otherwise. GRECO notes that the resources allocated to the COEC remain not sufficient to carry out regular substantive control of declarations of private interests of PTEFs. In view of the above, this recommendation can be seen as complied with only partly.
45. GRECO concludes that recommendation vi remains partly implemented.

Recommendation vii

46. *GRECO recommended (i) that the respective roles of the Chief Official Ethics Commission and of the heads of institutions charged with ensuring compliance of persons entrusted with top executive functions with the provisions of the Law on the Adjustment of Public and Private Interests be clarified and (ii) that the investigation of possible violations of the provisions of the Law by persons entrusted with top executive functions be carried out by an independent authority following a clear procedure*
47. GRECO recalls that this recommendation was not implemented in the Compliance Report. The Lithuanian authorities had recognised the need for a clear delimitation of competences of the COEC to investigate possible integrity violations by PTEFs, and relevant legislative amendments were under preparation. GRECO called upon the authorities to provide in law that any such potential violations are investigated by an independent body, and to establish clear investigative procedures in that regard.
48. The Lithuanian authorities now submit that, with regard to the first part of this recommendation, no legislative amendments have been enacted. They maintain that, in practice, the respective roles of the COEC and of the heads of institutions are applied in a uniform and consistent manner, and procedures and responsibilities in ensuring compliance with the provisions of the Law on the Adjustment of Interests and the Law on Corruption Prevention are well defined. The authorities reiterate that the COEC serves as the main investigative body with regard possible integrity-related violations by high-level officials, while the heads of institutions are responsible for prevention and primary oversight of employees through internal control and compliance mechanisms within their respective bodies,³⁰ in which case the COEC acts as an external oversight body. The authorities further maintain that the COEC's independence is guaranteed by

³⁰ When a potential violation of the Law on the Adjustment of Interests is identified, the institution conducts an investigation into the possible misconduct or breach of duties. Institutions are then required to submit their decisions and all investigation materials to the COEC within five working days.

the fact that it is accountable to Parliament and is free from the influence of other branches of government.

49. According to the statistical information received from the authorities, in 2024, the COEC conducted 28 investigations, and violations were confirmed in 25 cases, including with respect to the President of Lithuania, an ambassador, and three mayors. In the same year, acting as an appellate body for decisions made by municipal ethics commissions, the COEC reviewed 22 complaints and overturned 19 decisions made by municipal ethics commissions, most due to procedural violations. Also in 2024, in 13 investigations carried out by municipal ethics commissions, the COEC decided to initiate independent investigations in four cases on the grounds of possible improper application of the provisions of the Law on the Adjustment of Interests.
50. Finally, the authorities submit that, to enhance the effectiveness of investigations by the COEC, on 26 June 2025, Parliament adopted amendments to the Law on the COEC, making it mandatory for natural persons, institutions, agencies and other legal entities to submit, at the request of the COEC and within the specified time limit, the information, explanations and documents necessary for the COEC to exercise its powers, or to fulfil other legitimate demands of the COEC (Article 29, paragraph 1 of the Law). The amendments also stipulate that failure to provide the requested information within the time limit, or refusal to provide it, may be appealed before the administrative court and subsequently before the Supreme Administrative Court (Article 18, paragraphs 1 and 3 of the Law). The authorities submit that the COEC may, in cases where doubts arise regarding investigations conducted by other institutions under the provisions of the Law on the Adjustment of Public and Private Interests, is authorised to initiate its own investigation (Article 24(4) of the Law on the Chief Official Ethics Commission). The authorities sustain that this mechanism ensures the independence of investigations related to PTEFs and that the COEC effectively exercises in practice its role as an independent body for such investigations.
51. GRECO takes note of the information submitted by the authorities. It regrets that the previously envisaged amendments to the Law on the COEC to define more clearly the rights and duties of compliance officers and to specify that investigations on these matters with respect to PTEFs are to be conducted by COEC have not been pursued. That said, GRECO notes some examples from practice, where breaches of certain restrictions by senior public officials, including the President, have led to investigations by the COEC. These cases, however, cannot substitute the need for clarifying the legal framework, previously acknowledged by the authorities. Further, GRECO recognises the added value of providing the COEC, through legal amendments adopted on 26 June 2025, with additional tools to obtain the necessary information for its investigations. Overall, as the responsibility for investigating possible integrity-related violations by PTEFs has not been clearly reserved to the COEC as an independent body, GRECO's concerns expressed at the time of the adoption of the Evaluation Report (paragraphs 157 and 158 of the Evaluation Report) remain valid. Therefore, GRECO cannot consider this recommendation to be complied with more than partly.
52. GRECO concludes that recommendation vii has been partly implemented.

Recommendation viii

53. *GRECO recommended that the sanctions for violations of the Law on the Adjustment of Public and Private Interests be reinforced in order to ensure that they are effective, proportionate and dissuasive.*
54. It is recalled that this recommendation was not implemented in the Compliance Report. No new measures were reported by the authorities, and the concern expressed in the Evaluation Report regarding the absence of tangible sanctions for violations established by the COEC in respect of the President, members of Parliament and ministers had not been addressed.
55. The Lithuanian authorities report again that no new measures were introduced in response to this recommendation. They reiterate that the Law on the Adjustment of Interests establishes a multi-layered system of accountability, which includes career restrictions,³¹ defines serious violations,³² and has a reputational impact.³³ The authorities also refer to the Code of Administrative Offences, which provides for financial sanctions in cases of serious violations of the Law on the Adjustment of Interests, including a fine ranging from €600 to €1,600 for the first violation, and a fine ranging from €1,600 to €2,600 for a repeated violation. The authorities maintain that these amounts are significant and proportionate, especially when applied alongside other measures such as public disclosure and internal investigations.
56. GRECO takes note of the information provided. It regrets that the authorities have not substantially addressed this recommendation. While GRECO recognises that integrity framework cannot rely on sanctions alone, possible violations of integrity rules by PTEFs, which may not always trigger criminal investigations, require effective, proportionate and dissuasive sanctions.
57. GRECO concludes that recommendation viii remains not implemented.

Preventing corruption and promoting integrity in law enforcement agencies

Recommendation xi

58. *GRECO recommended that a system of co-ordination be established in order to provide for more consistency between the policies and decisions of the various ethics commissions of the Lithuanian Police.*
59. GRECO recalls that this recommendation was not implemented in the Compliance Report. GRECO considered that the planned establishment of a Central Ethics Commission, alongside police ethics commissions major districts, could address the

³¹ A person found to have violated the Law on the Adjustment of Interests cannot be promoted or appointed to a higher position for 1 year (or for 3 years if the violation is considered serious or the person was dismissed from office).

³² Criteria for serious violations are clearly defined in Article 23 of the Law on the Adjustment of Interests: repeated violations, disregard of prior written recommendations, or the actual realisation of a private interest.

³³ Even if the person remains in office, the inability to advance in their career constitutes a tangible consequence, particularly for high-level officials.

concerns underlying this recommendation, but this process had not yet commenced. Similarly, planned steps to centralise police institutions, potentially improving the consistency of ethics commissions decisions, were still pending.

60. The Lithuanian authorities now report that, as per the amended Order of the Police Commissioner General “*On the Approval of the Implementation Plan for the Recommendations of the Group of States against Corruption (GRECO)*” (hereinafter - the Implementation Plan, as amended on 27 February 2025) the Regulations for Police Ethics Commissions have been amended (on 10 October 2025) to establish a revised framework requiring police ethics commissions to submit their decisions to the Central Ethics Commission,³⁴ which is empowered to review cases, hear appeals, issue recommendations, and promote consistent ethical standards across police institutions.
61. GRECO takes note of the information provided by the authorities. It welcomes the regulatory and practical steps taken to ensure consistency in the decisions of ethics commissions in all police institutions, and to provide the Central Ethics Commission of the Police with competence to assess the decisions of police institution commissions and provide recommendations to support uniform application of the Police Code of Ethics. GRECO therefore considers that this recommendation has been complied with.
62. GRECO concludes that recommendation xi has been implemented satisfactorily.

Recommendation xii

63. *GRECO recommended that a centralised mechanism be introduced for providing confidential advice to members of the Police and the State Border Guard Service on ethical and integrity matters.*
64. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO noted enhanced possibilities for reporting wrongdoing and requesting consultation, including anonymously, with the Immunity Board of the Police. While these measures enabled staff seeking advice, their primary objective was to facilitate the reporting of violations, and the role of the Immunity Board in providing ethics and integrity advice had not been clearly communicated to law enforcement personnel. Furthermore, a centralised mechanism for confidential advice on ethics and integrity for members of the Police and the SBGS was still not in place.
65. The Lithuanian authorities now report that among the new objectives under the amended Implementation Plan (paragraph 60 above) is enhancing the competences of the Control Division of the Immunity Board of the Police by assigning it the function of providing confidential consultation to police officers on ethics and integrity matters. The authorities indicate that, on 14 May 2025, the Police Commissioner General approved amendments to the Regulations of the Immunity Board, whereby the functions of its Control Division were supplemented with the following provision: [the Control Division of the Immunity Board] “*provides confidential consultations to police employees on*

³⁴ The decisions made by the police institutions commissions are submitted to the Central Commission for review by email etika@lists.policija.lt

issues of ethics, integrity, and resistance to corruption regarding the provisions of the Law on the Protection of Whistleblowers of the Republic of Lithuania”.

66. Further, on 3 March 2025, the Regulations of the Immunity Board of the State Border Guard Service (hereafter – SBGS) were amended by the Order of the Head of the Service, adding a provision to the effect that the SBGS Immunity Board *“shall monitor the compliance of the staff of the SBGS with the standards of anti-corruption conduct, advise them on anti-corruption conduct, on the coordination of public and private interests, on lobbying, on ethics and on the conduct of the SBGS, and shall advise them on possible threats from foreign intelligence and security services when travelling abroad on personal and official business purposes; where necessary, apply preventive and/or impact measures to create a corruption-proof environment and other measures provided for in legislation”*. In addition, the Regulations of the Immunity Board have also been amended to read as follows: [First Section of the Immunity Board] *“monitors the compliance of the staff of the Office with the standards of anti-corruption behaviour, advises them on anti-corruption behaviour, on the coordination of public and private interests, on lobbying, on ethics and conduct, and, where necessary, applies measures to create a corruption-proof environment and other measures provided for in legislation to create a corruption-proof environment and other preventive and/or impact measures”*.
67. Further, the authorities also refer to a section entitled “Ethics and Conduct Consultations” on the SBGS intranet, which provides contact details of Immunity Board staff and allows consultations with them directly on ethics and integrity issues, including anonymously. Finally, the SBGS continues operating a consultation channel under the heading “Ethics and Corruption Resilience Advice” on its website.
68. GRECO takes note of the information provided. It notes with satisfaction that confidential counselling functions have been introduced within the Police and SBGS Immunity Boards and that additional consultation channels on ethics and integrity remain operational. It follows that the requirements of this recommendation have been complied with.
69. GRECO concludes that recommendation xii has been implemented satisfactorily.

Recommendation xiii

70. *GRECO recommended carrying out integrity checks of employees in the Police and the State Border Guard Service at regular intervals depending on their exposure to corruption risks and on the required security levels.*
71. GRECO recalls that this recommendation was partly implemented in the Compliance Report. GRECO took note of the adoption of new rules requiring inspections of the Police and the SBGS employees at regular intervals, and defining procedures for these inspections, notably with regard to resistance to corruption. Nonetheless, the new procedures did not envisage integrity checks for positions particularly exposed to corruption risks, and therefore did not meet the recommendation in full.

72. The Lithuanian authorities now report that, in accordance with the Implementation Plan, on 7 April 2025 the Police Commissioner General approved the list of positions in the Police (heads and deputy heads), which would require a written request of information from the Special Investigation Service to ensure that appointees to these positions are trustworthy persons, loyal to the Lithuanian state, with an impeccable reputation. The list includes 426 positions in the central structures of the Police, as well as county police headquarters. Integrity checks of heads and deputy heads of the Police are also carried out at regular intervals while in office, on rotation, or other grounds. The authorities submit that, as corruption is considered among risk factors in the police work, integrity inspections are envisaged for every police employee who has not been inspected in the last three years on any other grounds.³⁵ According to the authorities, in the course of 2025, some 12 912 such inspections have been conducted. In addition, as required by the anti-corruption action plans of the Ministry of the Interior, the Police, and the order of 24 April 2023 *“On the approval of the report form on trends in criminal acts, official misconduct and corruption in the Lithuanian Police”*, the Police General Commissioner and the Ministry of the Interior are informed every six months of police employees’ outside activities, convictions, administrative offences, misconduct, and other breaches. Finally, internal control measures, non-public inspections and other controls are regularly carried out to monitor the performance of police officers. The authorities conclude that these measures provide for complete and regular checks of ethics and integrity of police employees.
73. Further, the authorities reiterate that, in accordance with the procedure approved on 15 May 2023 by the Head of the SBGS,³⁶ all employees of the SBGS to are subject to checks regarding corruption risk factors (“corruption resistance” checks) every three years. The authorities also refer to the order of the Head of the SBGS of 8 April 2022 on the discreet performance screening of senior employees³⁷ of the SBGS to assess their readiness to carry out their functions properly, and the order of 19 December 2020 of the Head of the SBGS regarding the screening of candidates to be sent for training in educational establishments, as well as those to be recruited by, or returning to the SBGS.³⁸ According to the authorities, the SBGS conducted 1026 ethics and integrity checks of its employees in 2023, 934 in 2024 and 1346 in 2025, which included both those carried out at the time of appointment or return to service, and those conducted with respect to employees already in office. As to the discreet screening of the SBGS employees,³⁹ the authorities submit that 85 were conducted in 2023, 90 in 2024 and 65 in 2025.

³⁵ The specific grounds for integrity inspection are set out in the Description of the procedure for the screening of persons (paragraph 5.7 of the Police Commissioner’s Order of 29 December 2022 *“On approval of description of the procedure for the screening of persons”*).

³⁶ Entitled: *“On the conduct of corruption proofing of the employees of the State Border Guard Service under the Ministry of the Interior of the Republic of the Lithuania”*.

³⁷ Deputy Commanders of the SBGS, Commanders of Vilnius, Varėna and Pagėgiai border teams, Heads of Boards of Immunity, Criminal Investigations and Border Control Organisation of the SBGS.

³⁸ They point out that Annex III of the Order of 19 December 2020 contains a list of posts in the SBGS with higher corruption risks subject to additional checks by the Special Investigation Service, including heads of boards, heads of divisions, commanders and deputy commanders of detachments, senior advisers, principal advisers etc.

³⁹ Cases when discreet screening is to be conducted include the following:

1. Deficiencies and risks identified during an inspection of the activities of a structural unit of the SBGS or during an internal audit are assessed;

74. GRECO takes note of the information provided by the authorities. It takes note of a list of selected senior positions in the Police, requiring additional checks during the vetting of candidates for appointment to these positions.⁴⁰ Further, GRECO welcomes that, in addition to the vetting of senior Police officials (heads and deputy heads) at the time of their appointment, introduced in April 2025, regular integrity checks are also being carried out with regard to these officials. Overall, GRECO recognises the substantial efforts of the Police and the SBGS to conduct various checks of ethics and integrity of their employees on different positions at regular intervals, which appear to cover a considerable number of staff. Therefore, GRECO considers that the concerns underlying this recommendation have been adequately addressed.
75. GRECO concludes that recommendation xiii has been implemented satisfactorily.
- Recommendation xiv
76. *GRECO recommended that measures be taken to ensure consistency between the police institutions in respect of the policy and decisions to authorise outside activities.*
77. It is recalled that this recommendation was not implemented in the Compliance Report. GRECO took note of the ongoing reform in the Police and expected further information on its impact on the implementation of this recommendation regarding outside activities.
78. The Lithuanian authorities now report that, in accordance with the Implementation Plan (paragraph 60 above), on 28 May 2025, Advisory Guidelines have been adopted for members of commissions for the examination, decision-making, and revocation of requests for permissions to engage in outside employment, submitted by employees to respective police institutions. The Guidelines apply across all 13 police institutions and aim to ensure uniform examination of outside employment permission requests by the commissions set up within these institutions, offering interpretation of relevant legal and regulatory provisions (Law on the Adjustment of Interests, Police Code of Ethics, Statute of the Internal Service etc.), clarifying responsibilities of the commissions, and providing specific examples of different aspects to be considered, depending on types of outside employment. The authorities indicate that since the entry into force of these Guidelines (up to 18 August 2025), the Commission received 242 permission requests for outside employment, of which 239 were granted and 3 were refused.

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2. After analysing the content of complaints, reports, statements, or other information received about the possible inappropriate behaviour, activities, or performance of tasks or functions of the SBGS employee ;
 3. In other cases, there is a justified and reasonable need to assess the loyalty of SBGS employees, ensure compliance with SBGS operating principles, and ensure the effective use of human and material resources.

⁴⁰ Vetting of candidates by the SBGS prior to their admission into training institutions has been acknowledged by GRECO at the time of the evaluation (paragraph 213 of the Evaluation Report), and regular screening of employees on corruption resistance (once in three years) was taken note of in the Compliance Report of 2024 (paragraph 73 of the Compliance Report).

79. GRECO takes note of the information provided and welcomes the adoption of Advisory Guidelines on permissions for police employees' outside employment, which clarify the relevant legal and regulatory provisions and promote their uniform interpretation across all 13 police institutions, including through specific examples. GRECO encourages the authorities to ensure consistent application of the Advisory Guidelines in practice by all police institutions.
80. GRECO concludes that recommendation xiv has been implemented satisfactorily.

Recommendation xvi

81. *GRECO recommended developing specific policy mechanisms for preventing and managing conflicts of interest after officers leave the Police and the State Border Guard Service to work in the private sector.*
82. GRECO recalls that this recommendation was not implemented in the Compliance Report. GRECO noted that no new measures had been taken to introduce preventive mechanisms regarding employees leaving the Police and the SBGS to take up employment in the private sector. Therefore, potential conflicts of interest and challenges to safeguarding the confidentiality of information arising in this context had not been remedied.
83. The Lithuanian authorities refer to the provisions of the Law on the Adjustment of Interest, setting out restrictions⁴¹ applicable to former public employees taking up jobs in the private sector. They further indicate that the Implementation Plan envisages cooperation of the Police with the COEC on the application of relevant mechanisms in this area.⁴² In addition, the authorities indicate that, upon leaving service, Police employees are now required to sign a Memorandum of Recommendations for Police staff terminating their service and taking up employment in the private sector. According to statistical information provided, by 18 August 2025, some 128 police staff members had received the said Memorandum.⁴³
84. With regard to post-employment rules in the SBGS, the authorities refer to the Order of the Head of the SBGS adopted on 31 July 2020 on the *"Description of the procedure for reconciling public and private interests in the State Border Guard Service under the*

⁴¹ In particular, reference is made to Article 15 of the Law on the Adjustment of Interests, which provides that "a person who, while performing the duties referred to in Article 2(5) of this Law during the last year of his employment in that capacity, has directly drawn up, considered or adopted decisions relating to the supervision or control of the activities of a legal person (regardless of its legal form and ownership), or decisions by which funds from the State or municipal budgets and monetary funds of the Republic of Lithuania have been allocated to that legal person, or other decisions relating to property, may not, after leaving the post referred to in Article 2(5) of this Law, perform duties in the legal person referred to in this Article for a period of one year, unless otherwise provided for in other laws".

⁴² More specifically, the Police and the SBGS aim to contribute, within the scope of their competences, to the development of mechanisms for the prevention and management of conflicts of interest when employees leave the police service and start working in the private sector, and to inform all police staff of potential conflicts of interest after leaving the service and to take up employment in the private sector.

⁴³ According to the authorities, all police employees must review and confirm receipt of memoranda of recommendations on the prevention of conflicts of interest upon termination of service in the police.

Ministry of the Interior of the Republic of Lithuania".⁴⁴ In addition, training programmes for the SBGS staff include the topic of balancing public and private interests, covering the legal and regulatory acts establishing the "cooling-off period" after leaving service.⁴⁵

85. Finally, the authorities report that to manage the highest risks, the COEC conducts checks with regard to the most senior public sector officials. The authorities also refer to an online training course developed by the COEC, entitled "*Restrictions After Leaving Public Office*", with practical examples and recommendations to help assess employment opportunities in relevant institutions. According to statistical information provided by the authorities, a total of 1 115 police employees have completed these training modules. Further, in 2025, some 67 employees of the SBGS took part in the online training course "*Restrictions after leaving public service*", also conducted by the COEC. In addition, in the same year, the SBGS organised four training courses on corruption prevention (covering the "cooling-off period") on the "Moodle" training platform, with the participation of 200 officers and 58 civil servants.
86. GRECO takes note of the information submitted. It notes that concrete practical measures are taken to ensure that the staff of the Police and the SBGS, leaving public service, are systematically informed of the restrictions on their employment in the private sector, and that Police employees are now required to sign the Memorandum of Recommendations in that regard. Post-employment restrictions also seem to be addressed through various trainings, which are widely attended by the Police and the SBGS employees. These are steps in the right direction and should be welcomed. Nonetheless, the onus of the observance of post-employment restrictions remains on the law enforcement employees leaving their jobs for private sector. No pro-active verifications of potential risks of conflicts of interest are carried out by the Police or the SBGS. In this regard, inspiration could be drawn from the system of management of conflicts of interest in the context of outside employment, already introduced in the Police and the SBGS (see paragraphs 79-80 above). Conflicts of interest could be avoided more efficiently through, for instance, systematic so-called "exit interviews" and other pro-active steps, allowing to identify and prevent any risks of conflicts of interest when moving to the private sector. As this is not the case for the time being, this recommendation can be considered as implemented only partly.
87. GRECO concludes that recommendation xvi has been partly implemented.

III. CONCLUSIONS

88. In view of the foregoing, GRECO concludes that Lithuania has satisfactorily implemented thirteen of the seventeen recommendations contained in the Fifth

⁴⁴ This Order provides for a one-year "cooling-off period" for employees after their service. During this period, former employees may not represent natural or legal persons in the SBGS, except for cases listed by law, determined by the COEC on a case-by-case basis.

⁴⁵ As per Article 14 of the Law on Adjustment of Public and Private interests, a public institution can assess the risks of a possible conflict of interest and take measures to manage such risks if the employee has a close working relationship with the prospective employer in the private sector.

Round Evaluation Report. Of the remaining four recommendations, three have been partly implemented and one has not been implemented.

89. More specifically, recommendations i-v, ix-xv and xvii have been implemented satisfactorily, or dealt with in a satisfactory manner, recommendations vi, vii and xvi have been partly implemented and recommendation viii has not been implemented.
90. With regard to top executive functions, positive results have been achieved in a number of areas. New rules have been adopted to harmonise timelines for public consultations regarding draft legislation emanating from government, and inter-agency coordination has been strengthened in this respect. Guidance on the implementation of the Code of Conduct for State Politicians, containing practical examples, has been expanded further and is now addressed to all state politicians, including the President. Diverse training possibilities on this topic continue being offered by the Chief Official Ethics Commission. Further, harmonised rules and procedures to register gifts received by public officials have become operational, and guidance to facilitate declaring, valuating, registering and handling of gifts has also been issued. The system of verification of public officials' declarations of private interests has evolved further, the functions of verifying them has been delegated to compliance officers in ministries and other public bodies, and the practice of more detailed reporting of lobbying activities by persons entrusted with top executive functions has been increasing. Along these positive steps, more tangible results are yet to be demonstrated in some areas, such as defining the responsibility of the Chief Official Ethics Commission over verifying private interest declarations of PTEFs, investigating possible integrity-related violations, and introducing effective, proportionate and dissuasive sanctions for infringements of ethics and integrity rules by PTEFs.
91. With regard to the law enforcement agencies, further notable progress has been made in several areas. In particular, regulatory and practical measures have been introduced to support uniform application of the Police Code of Ethics and ensure consistency in the decisions of police ethics commissions, with a supervisory role of the Central Ethics Commission. The adoption of Advisory Guidelines for examining requests for outside employment, providing concrete examples of possible risks, is another welcome development. Additional integrity checks were introduced as part of pre-appointment vetting process for selected senior positions in the Police, and integrity checks appear to be conducted regularly with respect of the Police and the SBGS employees already in office. Further practical measures have been taken to inform the staff of the Police and the SBGS, leaving public service, of the post-employment restrictions and possible risks of conflicts of interest, but pro-active verifications of such risks are still lacking both in the Police and the SBGS. Finally, a new function of confidential counselling has been assigned to immunity boards of the law enforcement agencies under review, and additional consultation tools remain available in this regard.
92. In accordance with Rule 31 revised bis, paragraph 10 of GRECO's Rules of Procedure, the adoption of this Second Compliance Report terminates the Fifth Round compliance procedure with respect to Lithuania. The Lithuanian authorities may, however, wish to inform GRECO of the developments concerning the implementation of recommendations vi, vii, viii and xvi, which remains incomplete.

93. GRECO invites the authorities of Lithuania to authorise, as soon as possible, the publication of this report, to translate it into the national language and to make the translation public.