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# FIFTH EVALUATION ROUND

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

## COMPLIANCE REPORT

# ARMENIA



Adopted by GRECO  
at its 103<sup>rd</sup> Plenary meeting (Strasbourg, 8-12 June 2026)



Group of States against Corruption  
Groupe d'États contre la corruption

COUNCIL OF EUROPE



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## 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 Compliance Report assesses the measures taken by the authorities of Armenia to implement the recommendations made in the [Fifth Round Evaluation Report on Armenia](#) which was adopted by GRECO at its 96<sup>th</sup> plenary meeting (18-22 March 2024) and made public on 18 April 2024.
3. As required by GRECO’s Rules of Procedure,<sup>1</sup> the authorities of Armenia submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 13 January 2026 and served as a basis for this Compliance Report.
4. GRECO selected North Macedonia (in respect of top executive functions in central governments) and Denmark (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Mr Vladimir GEORGIEV, on behalf of North Macedonia, and Mr Jonathan GASSEHOLM on behalf of Denmark. They were assisted by GRECO’s Secretariat in drawing up this report.
5. The Compliance Report assesses the implementation of each individual recommendation contained in the Evaluation Report and gives an overall appraisal of the level of the member’s compliance with these recommendations. The implementation of any outstanding recommendations (partly or not implemented) will be assessed on the basis of a further Situation Report to be submitted by the authorities 18 months after this Compliance Report is adopted.

## II. ANALYSIS

6. GRECO addressed 22 recommendations to Armenia in its Evaluation Report. Compliance with these recommendations is dealt with below.

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

### Recommendation i

7. *GRECO recommended that the legal status and obligations of advisors who act on a voluntary basis (unpaid advisors) be clarified and regulated to subject them to the highest standards of transparency, accountability, and integrity (in particular, as regards rules of conduct, the prevention of conflicts of interest, the use of confidential information and financial disclosure).*

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<sup>1</sup> 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.

8. The authorities report that the Law on Public Service (LPS) has been amended to extend core elements of the integrity system to unpaid advisors, making them subject to rules of conduct, restrictions on the acceptance of gifts, post-employment restrictions (cooling-off period), conflict of interest provisions, as well as obligations to submit declarations of assets, interests, and expenditures. The amendments also align the liability for breaches of integrity rules by voluntary advisors with the liability regime applicable to other persons holding public positions. The Armenian authorities also note that incompatibility measures are not included in the amended legislation due to the nature of the functions performed by unpaid advisors.
9. GRECO notes the steps taken by Armenia to strengthen the integrity measures applicable to unpaid advisors and to clarify their legal status, notably through the amendments to the LPS, which extend the application of Chapters 5 (Integrity System) and 6 (Declaration of property, income, interests and expenditure) of the LPS to advisors appointed on a voluntary basis.
10. GRECO concludes that recommendation i has been implemented satisfactorily.

#### Recommendation ii

11. *GRECO recommended that (i) a risk analysis covering persons entrusted with top executive functions' specific integrity risks be carried out on a regular basis and that remedial measures be included in the anti-corruption strategies and action plans; and (ii) that persons entrusted with top executive functions undergo an integrity check ahead of or right upon their appointment in order to identify and manage possible conflicts of interest .*
12. The authorities note that an amendment to the Law on the Corruption Prevention Commission was adopted. The Law, as amended, envisages the establishment of a unified system for corruption risk assessment applicable to (1) public authorities; (2) state and community non-commercial organisations operating in the fields of healthcare, social affairs, environmental protection, expertise, construction, or investment programmes, as well as those that have received subsidies or grants from the state budget within the last three years; (3) foundations established by the State; and (4) commercial organisations with fifty percent or more state and/or community participation. Under the law, the Corruption Prevention Commission (CPC) is to develop and approve the methodology for corruption risk assessments by 19 August 2026 (six months after the entry into force of the law), conduct risk assessments, publish their results, submit recommendations to the competent authorities on addressing identified risks, and provide professional guidance to the entities subject to assessment. Moreover, the Armenian authorities note that, while the methodology is not intended for the direct assessment of personal integrity risks of persons entrusted with top executive functions, the regular assessment of processes within their scope of responsibility—including the analysis of relevant legislation, governance and decision-making mechanisms— will allow the identification of corruption risks associated with the exercise of discretionary powers, regulatory gaps, and other integrity or accountability vulnerabilities related to executive functions. A pilot corruption risk assessment was conducted in five companies with state participation.

13. Furthermore, the authorities report that a forthcoming sectoral strategy envisages the specific requirement to ensure that risk assessments explicitly cover the integrity risks of persons with top executive functions (hereinafter “PTEFs”) on a regular basis, and that corresponding remedial measures are incorporated into anti-corruption strategies and action plans.
14. Regarding the conduct of integrity checks for PTEFs, as an interim measure, the CPC approved a monitoring plan of incompatibility requirements in 2025 for monitoring the current appointed PTEFs, covering the Prime Minister, Deputy Prime Ministers, Ministers and their Deputies, as well as Advisers to the Prime Minister, Deputy Prime Ministers, and Ministers. The Armenian authorities also indicate that, based on the discrepancies identified during the conducted assessments, relevant proceedings have already been initiated.<sup>2</sup>
15. The authorities also report that the Law on the Corruption Prevention Commission was amended to introduce a new article on integrity checks. Under new provision, the CPC is to carry out, within one month following the submission of declarations upon taking office by the Prime Minister, Deputy Prime Ministers, Ministers, their advisors (including those appointed on a voluntary basis) and Deputy Ministers, an integrity check and to issue a non-binding advisory opinion on any potential integrity risks identified. The assessment also covers the declarations of family members, in accordance with the existing declaration system.
16. GRECO welcomes the inclusion of the topic of risk assessments related to PTEFs in the forthcoming sectoral strategy and takes note of the amendments to the Law on the Corruption Prevention Commission which vests the CPC with the authority to ensure the uniformity of corruption risk assessments in public institutions. It also tasks the CPC to develop and approve the risk assessment methodology, conduct the assessments, publish their results, submit recommendations on addressing identified risks to the competent authorities, and provide professional guidance to the entities subject to assessment. However, GRECO notes that the subjects of these risk assessments would be certain public bodies and organisations, including public authorities. In principle, these assessments would not specifically address PTEFs. Given that the CPC has not yet adopted the methodology for corruption risk assessments and, therefore, no risk assessment has been conducted, GRECO cannot ensure that PTEFs’ specific risks will be sufficiently covered, that risk assessments will be performed on a regular basis and that remedial measures will be included in the anti-corruption strategies and action plans, as required by part (i) of this recommendation. In light of this, and pending examples of risk assessments covering PTEFs, this part of the recommendation has been partly implemented.
17. Regarding part (ii) of this recommendation, GRECO welcomes the monitoring plan for incompatibility requirements approved by the CPC as an interim measure and the amendment to the Law on the Corruption Prevention Commission. This part of the recommendation is considered implemented.

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<sup>2</sup> The results of monitoring compliance with incompatibility requirements for PTEFs are published on the CPC’s website at the following link: <https://shorturl.at/vdRvT>. The report also outlines the main violations identified and provides details of their examination.

18. GRECO concludes that recommendation ii has been partly implemented.

Recommendation iii

19. *GRECO recommended (i) that a Code of Conduct for persons entrusted with top executive functions be adopted, made public, and coupled with a credible and effective mechanism of supervision and enforcement and (ii) that it be subject to systematic awareness raising in respect of persons entrusted with top executive functions via training (at the start of the term and at regular intervals), dedicated guidance and counselling.*
20. The authorities report that, regarding part (i) of the recommendation, the CPC adopted the Code of Conduct for Persons Holding a State Position on 6 February 2024. The Code entered into force on 1 April 2024 and applies to all PTEFs. They further note that, as a consequence of the amendment to the LPS that extends certain integrity provisions to unpaid advisors (see recommendation i above), the Code of Conduct for Persons Holding a State Position also applies to them.
21. Regarding the enforcement of the Code of Conduct, the CPC has carried out 70 examinations and has initiated proceedings in around 20 cases on the basis of apparent violations, the majority of which have already been concluded. With regard to supervision, although disciplinary liability is not applicable to political office holders under the current regulations prescribed by the LPS, the CPC duly exercises the tools available to it under its mandate. In accordance with the legal framework governing the CPC, where a violation of the rules of conduct by a political office holder is established by the CPC's conclusion, the public official concerned is required to issue a public explanation, which should be published on the website of the relevant authority.<sup>3</sup> The CPC's conclusions on violations of the rules of conduct are also publicly accessible on its website.
22. Regarding part (ii) of the recommendation, authorities report that the CPC conducted awareness-raising activities among PTEFs, both prior to the entry into force of the Code of Conduct for Persons Holding a State Position and throughout its implementation period. More specifically, the authorities mention official communications concerning the adoption of the Code and the norms established therein and the dissemination of printed versions of the Code of Conduct and explanatory materials among state bodies. In addition, the CPC has developed and introduced, on its electronic platform, a course entitled "Ethical Governance and Corruption Prevention for Public Office Holders", which has been specifically designed for PTEFs and includes a dedicated, targeted module on the rules of conduct applicable to them and their interpretation. In total, the CPC's platform hosts five separate courses related to integrity. Furthermore, official communications have been sent to the relevant individuals, including PTEFs,

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<sup>3</sup> The Armenian authorities informed GRECO during the course of its 103rd Plenary Meeting that during 2024 and 2025, the Commission had adopted six conclusions establishing violations of the Code of Conduct (including the Prime Minister in two cases and a Deputy Minister in one case). In five of these cases, the public officials that were found to have violated the Code of Conduct issued public explanations. Only in one case there was no public explanation issued, as the public official concerned challenged the Commission's conclusion before court. One of the five officials concerned was the Prime Minister, who issued public explanations in respect of two separate violations established by the Commission. The public explanation is available at the following link: <https://shorturl.at/TtyhP>.

encouraging their participation in this course. In addition, a dedicated methodological guide on the management of conflicts of interest situations for PTEFs (see paragraph 55 below), as well as for other persons holding public position and public servants, has been developed and adopted by the CPC. The number of users of the [e-learning platform](#) is around 10 000, of which 6 892 have taken the course on "Ethical Governance and Corruption Prevention for Public Office Holders", including also PTEFs.

23. Authorities also report other activities organised with high-level staff, including PTEFs, such as a training on integrity and codes of conduct or an awareness-raising meeting during which the Acting Chairperson of the CPC presented the integrity system to the members of the Government and other subjects of the Code, with particular emphasis on the rules of conduct and the practice of their application.
24. GRECO welcomes the adoption and entry into force of the Code of Conduct for Persons Holding a State Position, which interprets the principles of conduct outlined in the LPS and includes 55 mandatory rules of conduct for relevant officials. The Code of Conduct was made public and is available online. It is worth noting that, following the amendment of the LPS (see recommendation i), the Code of Conduct also covers unpaid advisors.
25. Regarding the establishment of credible and effective supervision and enforcement mechanisms, GRECO takes note of the practice by the CPC to request public explanations to persons holding political positions when a violation of the codes of conduct is committed (see paragraph 73 on draft legal amendments on this topic). However, in accordance with the current LPS, the provisions on disciplinary action do not apply to persons holding political positions. While GRECO acknowledges the existence of a draft amendment of the LPS to solve this issue (see paragraphs 71 to 75 below), no disciplinary action can be taken against PTEFs that contravene the Code of Conduct for Persons Holding a State Position at the time of drafting.
26. In summary, regarding part (i) of this recommendation, GRECO welcomes the adoption of a code of conduct applicable to PTEFs. However, there are still gaps in the supervision and enforcement mechanism applicable to PTEFs. GRECO, therefore, can only consider this part of the recommendation partly implemented.
27. Regarding part (ii) of this recommendation, GRECO welcomes the efforts made by Armenia in raising PTEFs' awareness on the existence and content of the Code of Conduct, notably the development of an online course on Ethical Governance and Corruption Prevention for Public Office Holders which contains modules on the applicable rules of conduct. GRECO trusts that these courses will be updated regularly to reflect any changes in the rules on integrity and conduct applicable to PTEFs. Despite these positive developments, GRECO notes that the online training does not seem to be mandatory and provided at regular intervals. Moreover, Armenia has not provided information on the dedicated guidance and counselling available to PTEFs. Therefore, this part of the recommendation is considered partly implemented.
28. GRECO concludes that recommendation iii has been partly implemented.

#### Recommendation iv

29. *GRECO recommended (i) carrying out an independent impact assessment of the implementation of the legislation regarding access to information, with a particular focus on the use of exceptions, the timeliness of responses, the practice of proactive disclosure, and effective enforcement, followed up with the necessary legislative and practical measures to improve public access to information; (ii) compiling and publishing official statistics on enquiries and complaints related to refusals, delayed or incomplete responses, and providing information to the public on steps taken for corrective action; and (iii) considering the establishment of a dedicated independent oversight body which would ensure systematic review, monitoring and the promotion of a unified implementation practice of the freedom of information legislation.*
30. The authorities report that the government adopted, on 4 December 2025, a package of three laws: the Law on Public Information, the Law on Cybersecurity and the Law on Regulation of Information Systems. Authorities also note the establishment of the Commission for the Regulation of Information Systems, which is required to publish an annual report on violations of the Law on Public Information, information holders who committed these violations, complaints received, proceedings initiated, sanctions applied, and other circumstances related to the law's implementation. In addition, authorities report that a Freedom of Information self-assessment mechanism for state bodies and a unified statistical reporting format have been developed and introduced. By 2025 all executive bodies and regional governors' (Staffs of Marzpets) offices have already published their 2024 Freedom of Information statistics, which include information on the number of enquiries received, rejected and satisfied, as well as the reasons for rejection where applicable. The data were collected and consolidated by the Prime Minister's Office.
31. Moreover, the authorities note that the Ministry of Justice has developed a concept paper for the establishment of a new, independent Personal Data Protection body to be vested with investigative, intervention and advisory powers. A draft law is being prepared in this regard. The authorities also note that Armenia is currently discussing the possibility of entrusting this body with the task of ensuring the systematic review, monitoring and promotion of a unified implementation practice of freedom of information legislation.
32. GRECO takes note of the information provided by Armenia regarding part (i) of this recommendation and welcomes the adoption of a legislative package, including the Law on Public Information, the Law on Cybersecurity and the Law on Regulation of Information Systems which are reportedly aimed to advance public information management and digital services. That said, GRECO recalls that the Evaluation Report identified a number of gaps in relation to access to information in Armenia (see paragraphs 81 to 86), including in relation to the scope of the Law on Freedom of Information (hereinafter FoIA), the exceptions to access to information, the proactive publication of information and the existence of effective recourses to appeal decisions on the FoIA. GRECO regrets that Armenia did not provide information on the conduct of any independent impact assessment on these issues, as required by part (i) of this recommendation.

33. Regarding part (ii) of this recommendation, GRECO takes note of the establishment of the Commission for the Regulation of Information Systems which is responsible for ensuring the implementation of information and cybersecurity legislation, as well as developing and implementing security measures for information systems. The Commission is also mandated to publish an annual report on the implementation of the Law on Public Information. However, such law does not directly address matters related to access to information by the public. Therefore, statistics provided on the implementation of that legal instrument would not fully meet the requirements of this recommendation. GRECO also takes note of the Freedom of Information self-assessment mechanism, whereby authorities have compiled and published information on received, granted and refused requests for information. This is a positive step towards greater transparency, but GRECO considers that more can be done to provide the public with a holistic view of the implementation of access to information requirements, including steps taken for corrective action, as called for by the recommendation. The establishment of a dedicated oversight body could further support this (see next paragraph).
34. GRECO, with regard to part (iii) of this recommendation, takes notes of the existence of a concept note developed by the Ministry of Justice of Armenia to establish a Personal Data Protection body and the fact that Armenia is currently discussing mandating this body to ensure the systematic review, monitoring and promotion of a unified implementation practice of freedom of information legislation. Nevertheless, it is worth noting that the conceptual development of this body is still in very early stages and no draft law has been finalised yet. GRECO looks forward to further developments in this regard.
35. GRECO therefore concludes that recommendation iv has been partly implemented.

#### Recommendation v

36. *GRECO recommended reviewing the current closed public procurement processes relating to ceremonial expenses of the President, the Prime Minister, the candidate for Prime Minister and the President of the National Assembly with a view to restricting their use exclusively when sufficiently justified on national security grounds.*
37. The authorities report that interagency consultations were initiated to explore appropriate approaches for enhancing transparency in the review of closed public procurement procedures related to the ceremonial expenses of the President, the Prime Minister, the candidate for Prime Minister and the President of the National Assembly, while safeguarding national security interests. Such consultations involved the Ministry of Justice, the Ministry of Finance, the State Protection Services, the Prime Minister's Office and the National Security Service. Relevant materials on international experiences and good practices, which are currently under review, were circulated to the relevant stakeholders with a view to their possible implementation and incorporation into national legislation. In order to establish the legislative basis for reviewing closed procurement procedures, the Ministry of Finance circulated a draft law on Making Amendments and Supplements to the Law on Procurements on 4 November 2025 which includes amendments to article 15 of the Law on Procurements regulating the scope of procurements containing state secrets. By Decision No. 589-A of 30 April 2026, the

Government approved the draft laws “On Amending the Law on Procurement” and “On Making Supplements to the Law on the Budgetary System” and submitted them to the National Assembly for adoption under an accelerated procedure. The authorities note that the proposed amendments provide that procurement plans containing secrets shall include only those goods, works, and services that contain state secrets in accordance with the procedure established by law. Accordingly, the proposed framework no longer automatically classifies ceremonial expenses as part of procurement plans containing state secrets. Instead, only information protected under the Law on State Secrets may be included in such plans. They further explain that, under the Law on State Secrets, information constituting a state secret is limited to information, products, or materials relating to the military sphere, foreign relations, economy, science and technology, intelligence, counterintelligence, or operational-investigative activities, the disclosure of which could harm the national security or interests of the Republic of Armenia.

38. GRECO notes with appreciation the efforts of Armenia in addressing this recommendation, notably the interagency consultations held and the draft amendment to the Procurement Law, which removes the obligation to include ceremonial expenses in procurement plans containing state secrets.
39. Pending adoption of the proposed amendments, GRECO concludes that recommendation v has been partly implemented.

#### Recommendation vi

40. *GRECO recommended ensuring meaningful participation of civil society, including through its engagement in the early stages of decision-making, allowing sufficient time for consultations, organising more frequent face-to-face consultations and public hearings, and sharing public suggestions to the maximum possible extent.*
41. The authorities note that public participation and engagement was as a priority pillar in the 2022-2025 Roadmap of the “Public Administration Reform” Strategy. Moreover, the Prime Minister’s Office established the Department for Participatory and Open Governance Issues (DPOGI) which is tasked with ensuring meaningful public engagement in the development and implementation of policies, reviewing and improving digital participation tools, supporting public administration bodies in building the necessary capacities, and mobilising the resources and expertise of international partners to institutionalise participatory governance. The Department also serves as the main contact point for cooperation with civil society organisations (CSOs), academia, private sector and for safeguarding Civic Space.
42. Authorities also report that the DPOGI developed, and the Prime Minister approved, the Procedure and Rules of Operation for Public Councils Adjacent to Ministers and Heads of Government Subordinate Bodies, which aim to ensure meaningful and continuous participation of civil society in decision-making processes. It stipulates that each council must convene at least four meetings per year, enabling regular, structured, and results-oriented discussions. The meetings are subject to live streaming or video recording, and the summaries and recommendations must be made publicly accessible. The authorities also report that Public Councils have already been established under all 12 ministries and three bodies subordinate to the Government of the Republic of Armenia, namely

the Cadastre Committee, the Urban Development Committee, and the State Revenue Committee. Moreover, it has been established that new initiatives are first discussed within the relevant Public Council prior to being submitted for inter-agency circulation and public consultation via the e-draft platform. Amendments to the Law on Normative Legal Acts aimed at, *inter alia*, introducing minimum consultation periods and providing additional measures to enhance the quality and effectiveness of public consultations are being prepared.

43. According to the information provided by the authorities, a Strategic Management Procedure was also adopted by the Government whereby each strategic document is accompanied by a working group, chaired by a Deputy Prime Minister, that is responsible for, *inter alia*, ensuring multi-stakeholder participation. Moreover, the Prime Minister adopted the Decision of 10 December 2025 on “approving the composition and rules of procedure of the working groups” and tasked said groups with coordinating the development of strategies and discussing their implementation.
44. Finally, the authorities note that an updated version of the Unified Website for the Publication of Legal Acts was launched on 22 October 2025 and includes a number of improvements such as the possibility to submit proposals through email or using the website, and the mandatory requirement to provide responses to all submitted proposals.
45. GRECO welcomes the measures taken by Armenia to improve the participation of civil society, notably the establishment of the Department for Participatory and Open Governance Issues aimed at institutionalising public participation in public affairs, as well as the adoption of the Procedure and Rules of Operation for Public Councils Adjacent to Ministers and Heads of Government Subordinate Bodies. These developments are expected to provide civil society a more structured and frequent interaction on law-making processes. GRECO also welcomes the roll out of new features in the Unified Website for the Publication of Legal Acts, including the requirement to provide responses to all submitted proposals.
46. However, despite these positive developments, some key changes are still necessary. Amendments to the Law on Normative Legal Acts (especially regarding to minimum consultation periods) and the implementation of measures aimed at shortening the times to provide feedback to proposals are some of the measures still needed to assess this recommendation to be fully implemented. GRECO would also welcome data and statistics on the impact that the foreseen measures have on the meaningful participation of civil society in public affairs and decision-making processes.
47. GRECO concludes that recommendation vi has been partly implemented.

#### Recommendation vii

48. *GRECO recommended that (i) detailed rules and guidance be introduced on how persons with top executive functions engage in contacts with lobbyists and other third parties who seek to influence the government’s legislative and other activities; and (ii) sufficient information about the purpose of these contacts be disclosed, such as 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.*

49. The authorities report that the Anti-Corruption Strategy and its 2023-2026 Action plan included the introduction of regulations on lobbying activities (to prevent undue influence). Within this framework, the Ministry of Justice developed a draft law amending the LPS aimed at introducing regulations on the transparency of communications involving PTEFs. The draft law, after interagency and public consultations, was published on the Unified Platform for the Publication of Draft Legal Acts for public discussion. The Ministry of Justice is in the process of finalising the received opinions and will further submit it for the Government approval.
50. The draft amendment to the LPS proposes the introduction of a new provision mandating PTEFs to inform, within a three-day period, of any oral or written, direct or indirect communication with natural or legal persons that relates to activities on the drafting of legislative or strategic documents or is aimed at influencing activities on the drafting of legislative or strategic documents. In general, information that shall be communicated includes the date of the communication, the surname, name, patronymic and position held by the official and the person who communicated with the official, the form of communication and a brief description of the issues discussed. The information is to be published in the official website of the relevant public authority within three days after receipt of the notification, unless the data constitute a secret protected by law.
51. GRECO welcomes the draft law amending the LPS, which seeks to address the requirements of the recommendation regarding contacts between PTEFs and lobbyists and other third parties, and is currently undergoing public consultation. However, pending its adoption and implementation, in particular as regards the effective disclosure of such contacts, as well as the development of guidance in this area, as necessary, this recommendation is partly implemented.
52. GRECO concludes that recommendation vii has been partly implemented.

#### Recommendation viii

53. *GRECO recommended (i) that the responsibility for providing advice and making decisions on conflicts of interest of all persons entrusted with top executive functions, thus including advisors, be held by the Corruption Prevention Commission; and (ii) raising the awareness on the practical management of such situations, notably by developing detailed guidelines/manual for managing conflicts of interests of persons entrusted with top executive functions and by collecting statistics on conflicts of interest situations and measures taken.*
54. The authorities note that, while the CPC is mandated to provide advisory opinions on the topic of conflicts of interest to political officials and officials without a hierarchical superior, they are not prevented from also providing guidance to other public officials and has done so in practice. The authorities also mention that a draft law was circulated, revised and submitted to the Prime Minister's Office on 18 December 2025. The draft law includes a mandate for the CPC to provide professional advice on incompatibility

requirements, other restrictions, rules of conduct and conflict-of-interest matters for a range of officials, including persons holding public positions (which also encompass PTEFs). The CPC has also prepared and submitted to the Ministry of Justice draft decisions aimed at increasing its human resources.

55. The authorities also report that the CPC developed and adopted a guide on the management of conflict-of-interest situations on 11 March 2026.<sup>4</sup> The guide was circulated to relevant bodies and sent to PTEFs. It is intended for public officials and public servants and aims to assist them in identifying, preventing and resolving conflict-of-interest situations, thereby ensuring the primacy of the public interest over private interests. It presents possible manifestations of conflicts of interest, as well as approaches taken by international organisations and other countries to address such situations. It further outlines the relevant domestic legal framework and the CPC's practice in examining conflicts of interest cases, including brief descriptions of the most frequently identified or similar types of cases, and provides illustrative examples. The CPC has also sent written circulars to public bodies regarding conflicts of interest situations frequently encountered in its practice, informing them about possible conflict of interest scenarios, ways to resolve them, the procedure for applying to the CPC, and the requirements for submitting a declaration on conflict of interest. Moreover, the authorities reported that a targeted online course dedicated to conflict of interest has been developed and launched on the CPC's e-learning platform and the Prime Minister has issued an instruction to PTEFs to ensure their participation, to the extent possible.
56. GRECO, regarding part (i) of this recommendation, takes note of the draft law regarding the functions of the CPC that was submitted to the Prime Minister's Office. The draft law, as examined by GRECO, aims at amending the Law on the Corruption Prevention Commission to allow the CPC to provide advisory opinions on integrity risks concerning PTEFs, including advisors. This would legally regulate the current unofficial practice carried out by the CPC and cover the first element of part (i) of this recommendation, namely that the CPC provides advice to all PTEFs (including advisors). GRECO notes, however, that the draft amendment does not address the second element of part (i) of the recommendation, which aims at ensuring that the CPC is also the sole authority tasked with making decisions on conflicts of interest matters regarding all PTEFs (including advisors). In this regard, GRECO recalls that advisors must still turn to their superiors for decisions on these matters and encourages Armenia to amend the relevant provisions of the LPS.
57. Regarding part (ii) of this recommendation, GRECO welcomes the measures implemented by Armenia to enhance the awareness of public officials, including PTEFs, on conflicts of interests, notably through the development of methodological guidelines on conflicts of interests for public office holders, as well as through training initiatives. Despite this, while GRECO welcomes the Prime Minister's instruction to PTEFs to ensure their participation in integrity training sessions, no details have been provided on their actual attendance.<sup>5</sup> The authorities have also not provided statistics on conflicts of interest situations and measures taken, as called for in the last part of the recommendation.

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<sup>4</sup> The guide can be accessed here <https://cpcarmenia.am/wp-content/uploads/2026/03/123.pdf>.

<sup>5</sup> The Armenian authorities informed GRECO during the course of its 103rd Plenary Meeting that one minister, three advisors and nine deputy ministers had participated in training sessions.

58. GRECO concludes that recommendation viii has been partly implemented.

Recommendation ix

59. *GRECO recommended (i) that post-employment restrictions be broadened in time and scope in respect of persons with top executive functions; and (ii) that an effective reporting, monitoring and enforcement mechanism regarding these rules be established.*
60. The authorities report that the Ministry of Justice developed draft legislative amendments aimed at significantly strengthening the cooling-off regime applicable to PTEFs and establishing an institutional mechanism for monitoring compliance. In September 2025, the Ministry of Justice prepared draft laws on making supplements to the LPS, which substantially broadened the scope of post-employment restrictions for PTEFs. Under the draft amendments, PTEFs are subject to an 18-month cooling-off period following the termination of their official duties during which they are prohibited from engaging in paid representation for the protection of third-party rights or interests in relations with any public body that was directly subordinated to them, or in relation to matters that fell within the scope of their official responsibilities. The authorities note that this restriction is not limited to formal hierarchical control but is linked to the substance of the matters handled by the PTEF. The draft law also introduces a prohibition on employment with, or becoming an employee of, any organisation over which the PTEF exercised direct supervision or control during the final 18 months of their tenure. PTEFs are also barred from engaging in private-sector activities, including entrepreneurial activities, where the use of official information obtained during public service could provide an undue advantage to a private organisation.
61. Regarding the establishment of a reporting and monitoring mechanisms, the authorities note that, under the draft amendment, PTEFs are granted the right, prior to taking up new employment or engaging in a new activity, to notify the CPC in writing in order to verify the compatibility of the intended activity with the statutory post-employment restrictions. Correspondingly, the CPC is granted an explicit legal mandate to examine such notifications, assess compliance with the cooling-off requirements, and issue a reasoned conclusion. Regarding liability mechanism, the amendments propose to establish fines varying from 300 to 500 times the minimum for the violation of the post-employment restrictions, and fines in the amount of 50 to 100 times the minimum salary in case of failure to terminate the performance of the employment within a 60-day period.
62. The draft laws were submitted for interagency review and published for public consultation on the e-draft platform. Following the receipt and consideration of stakeholders' opinions, the draft laws were revised accordingly and submitted to the Prime Minister's Office on 18 December 2025. The draft laws were further revised by the Ministry of Justice on the basis of instructions issued by the Deputy Prime Minister during the session of the State-Legal Ministerial Committee. The revised draft laws were subsequently submitted to the Government in March 2026.
63. GRECO, with regard to part (i) of the recommendation, welcomes the draft amendments to the LPS and the Law on the Corruption Prevention Commission. While GRECO notes that the new proposed cooling-off period falls somewhat below the most common

timeframe among GRECO members, which stands at two years, it acknowledges that the draft amendment expands the previous cooling-off period from one year to 18 months. With regard to the scope of the restriction, it has also been substantially broadened, in line with the recommendation.

64. Regarding part (ii) of this recommendation, GRECO notes that the draft amendment to the Law on the Corruption Prevention Commission empowers the CPC to study requests for verification received from PTEFs relating to future employment, and that the amendment to the Code of Administrative Offences proposes specific fines for violations of post-employment restriction rules. If finally adopted, these two measures would form an important part of the reporting and enforcement mechanisms.
65. GRECO encourages Armenia to continue its efforts to implement this recommendation, most notably the legislative amendment which is pending adoption.
66. GRECO concludes that recommendation ix has been partly implemented.

#### Recommendation x

67. *GRECO recommended that the Corruption Prevention Commission be provided with adequate financial and personnel resources to effectively perform its tasks with respect to persons entrusted with top executive functions.*
68. The authorities recognise that there is a significant increase in the mandate of the CPC resulting from recent and forthcoming legislative amendments and that there is a need to ensure commensurate financial and human resources to enable the effective discharge of these mandates and responsibilities, including with respect to PTEFs. In this regard, as a result of a functional and workload assessment, the CPC elaborated a draft proposal to increase its staff positions across several structural units, notably those responsible for integrity assessments, monitoring of conduct, and preventive functions. On 25 December 2025, this draft proposal was formally submitted to the Ministry of Justice in order to ensure further procedural follow-up, including initiation of the necessary governmental process and submission to the Government for consideration. As a result, on 30 April 2026, the Government adopted Decision No. 1500-A which provides for a revised staffing structure of the CPC and the increase in staffing numbers by eight.
69. GRECO welcomes the increase in CPC's staffing. This is a very positive development in view of its current and anticipated increased responsibilities (including regarding PTEFs). This positive trend should be sustained and further strengthened in accordance with the CPC's operational needs. However, no information was provided on the corresponding increase of financial resources.
70. GRECO concludes that recommendation x has been partly implemented.

## Recommendation xi

71. *GRECO recommended that the enforcement regime regarding ethics, conflicts of interest and integrity of all persons with top executive functions be substantially stepped-up, including by ensuring that all violations are subject to proper consequences.*
72. The authorities report that a package of draft laws proposing amendments and supplements to the LPS have been developed and published for public consultation. The draft laws aim at introducing and clarifying the disciplinary liability regime for persons holding political positions in cases of violations of conduct rules to address the legal gap whereby persons holding political positions were excluded from the general mechanisms of disciplinary liability for breaches of conduct rules. In March 2026, the draft laws were further discussed within the Ministry of Justice and subsequently amended.
73. The authorities note that the draft legislation establishes a procedural framework whereby, upon detection of apparent signs of a violation of the code of conduct, within a ten-day period, the Prime Minister (or in the case of advisers, the person authorised to appoint them) may impose one of the following disciplinary sanctions: 1) warning; 2) reprimand; 3) severe reprimand; 4) dismissal from office. In addition, it is provided that the person authorised to appoint to the position may apply the above-mentioned disciplinary sanctions either on their own initiative or on the basis of a recommendation received in accordance with Article 33(4) of the Law on the Corruption Prevention Commission. The amendments also introduce corresponding changes to the Law on the Corruption Prevention Commission. In particular, the CPC will not publish its conclusions on whether a political office holder has committed a breach of the code of conduct, and the official concerned will not be obliged to provide a public explanation. Instead, the conclusion may be transmitted to the relevant official (the Prime Minister or, in the case of advisers, the appointing authority), who will assess the need to impose disciplinary sanctions on that basis.
74. The authorities also report that the draft introduces time-limit safeguards, stipulating that no disciplinary penalty may be imposed if more than 12 months have elapsed since the commission of the violation, and that a disciplinary penalty expires if no new violation is committed within one year. The independence of disciplinary liability from civil, administrative, and criminal liability is also expressly reaffirmed.
75. The authorities further note that, pursuant to the Law on Amending and Supplementing the Law on Procurement, adopted on 6 May 2026, a comprehensive set of amendments was introduced to strengthen conflict of interest safeguards in public procurement. In particular, the legislation establishes a three-level system of influence, under which participation in procurement procedures is prohibited for bidders affiliated with persons holding public office. Furthermore, where on the basis of a conclusion of the Corruption Prevention Commission it is established that a participant has violated the prohibition on participation prior to the conclusion of the contract, the contracting authority is explicitly empowered to unilaterally terminate the contract.
76. GRECO welcomes the strengthening of conflicts of interest safeguards in public procurement and takes note of the draft law amending the LPS, which would insert a

provision on the disciplinary liability of persons holding political positions. It regrets, however, that the measures contained in the draft legislation do not cover the Prime Minister. Moreover, GRECO has misgivings regarding the fact that the power to impose disciplinary sanctions would lie with the official's superior, instead of with an independent body. In addition, GRECO would like to encourage the authorities to reconsider how the proposed time limits for disciplinary breaches and sanctions could affect the overall effectiveness of the compliance mechanism.

77. GRECO also recalls that loopholes in law regarding sanctions were identified in the Evaluation Report. More specifically, it was noted that the law did not consistently specify the applicable penalties regarding certain types of infringements and just referred to the possibility to impose disciplinary/administrative liability (see paragraph 180). The proposed draft legislation does not address this gap.
78. GRECO concludes that recommendation xi has been partly implemented.

#### *Preventing corruption and promoting integrity in law enforcement agencies*

##### Recommendation xii

79. *GRECO recommended that additional dedicated measures be taken to strengthen the representation of women at all levels in the police, including senior management.*
80. The authorities report that targeted actions aimed at increasing the involvement of women in the police are enshrined in the Police Reform Implementation Strategy and its 2024–2026 Action Plan. The authorities also note that, beginning in 2023, numerous measures and large-scale information and awareness-raising campaigns have been undertaken to attract a greater number of women to relevant police units and to enhance the visibility of women within the police system. To encourage the recruitment of female patrol officers, a large-scale awareness campaign titled “Be a Force for Our Country” was implemented. Focus group discussions were conducted to identify factors hindering entry into service, an action plan was developed, and a pre-registration process for applicants was introduced. Moreover, authorities reiterate that height and weight requirements to access the service were removed and mention that an awareness-raising campaign has been launched in support of the ongoing recruitment process for the Patrol Service under the slogan “Trust Yourself, Join Us”. Throughout all campaign activities, particular emphasis is placed on the importance of women's participation for the Ministry of Internal Affairs (hereinafter MoIA). Previously established age restrictions for entry into the police have been abolished in order to promote the involvement of individuals with diverse social and gender-age backgrounds, as well as varied knowledge and skills, in the police system.
81. Authorities further provide the following tables of allocation of position to women in Police Recruitment Competitions during 2024 and 2025 (Table 1), on women's representation within the MoIA, the Police and Patrol Police for 2024-2025 (Table 2) and on women in managerial and civil service positions within the MoIA (Table 3).

Table 1. Women in police recruitment competitions during 2024 and 2025.

| Service          | Year | Total Positions Announced | Positions Allocated to Women | Percentage Allocated to Women (%) | Notes                                                  |
|------------------|------|---------------------------|------------------------------|-----------------------------------|--------------------------------------------------------|
| Patrol Police    | 2025 | 239                       | 190                          | 80%                               | Majority of positions reserved for female applicants   |
|                  | 2024 | 250                       | 75                           | 30%                               | Recruitment ongoing; 90 women applied                  |
| Criminal Police  | 2025 | 700                       | 140                          | 20%                               | Targeted allocation to promote women's participation   |
|                  | 2024 | 80                        | -                            | -                                 | Recruitment announced; gender allocation not specified |
| Community Police | 2025 | 478                       | 145                          | 30.3%                             | Strong emphasis on attracting female candidates        |

Table 2. Women's representation within the MoIA, the Police and Patrol Police for 2024-2025

| Category         | Year | Total Positions | Women | Percentage of Women (%) |
|------------------|------|-----------------|-------|-------------------------|
| MoIA             | 2025 | 17 831          | 3 560 | 19.9%                   |
|                  | 2024 | 16 975          | 3 013 | 17.7%                   |
| Police           | 2025 | 11 130          | 974   | 8.7%                    |
|                  | 2024 | -               | -     | 7%                      |
| Patrol Police    | 2025 | 2 287           | 131   | 5.7%                    |
| Community Police | 2025 | 2 870           | 376   | 13.1%                   |

Table 3. Women in managerial and civil service positions within the MoIA

| Category                       | Year | Total Positions | Women | Percentage of Women (%) |
|--------------------------------|------|-----------------|-------|-------------------------|
| Managerial positions – MoIA    | 2025 | 1 054           | 171   | 16.2%                   |
|                                | 2024 | 1 329           | 210   | 15.8%                   |
| Managerial positions – Police  | 2025 | 464             | 27    | 5.8%                    |
| Civil service positions – MoIA | 2025 | 1 363           | 989   | 72.6%                   |

82. GRECO notes that the statistical information provided by Armenia shows that the percentage of women in the Police, Patrol Police and Community Police in 2025 (9.2% on average), as well as in managerial positions (5.8%) remain very low, but acknowledges the presence of some limited improvement with regard to the representation of women in the Police. In this regard, it welcomes the continuation and implementation of new measures targeted at strengthening the representation of women at all levels in the police, including the awareness raising campaigns conducted and the changes in legal requirements to allow for more inclusive recruitment processes. However, GRECO notes that no information was shared with regard to measures taken to increase the representation of women in managerial positions. In light of the data provided and the limited improvement mentioned above, GRECO can only consider this recommendation partly implemented and encourages Armenia to continue implementing measures to achieve the objective of this recommendation.
83. GRECO concludes that recommendation xii has been partly implemented.

#### Recommendation xiii

84. *GRECO recommended that (i) a review be carried out of internal and external media messaging, response times to public queries, and proactive messaging on internal and external matters (rather than reactive messaging) by the police, and that, as a result of it, dedicated measures are designed and implemented; (ii) publishing information on complaints received, action taken, and sanctions applied against police officers, while respecting the anonymity of the persons concerned; (iii) strengthening the capacity of the staff responsible for communicating to the press and the general public all the relevant information concerning the police, with the aim of enhancing transparency and public confidence in the police force.*
85. The authorities note, regarding part (i) of this recommendation, that an extensive review was conducted covering both the structural and functional aspects of the unit responsible for communications within the MoIA, as well as broader internal and external communication processes. As a result, the Strategic Communication Programme for Police Reforms was approved on 9 June 2025. The Programme contains

key conclusions, along with the future steps identified to further strengthen and improve activities in this field.

86. The responsible department of the MoIA conducts continuous, 24/7 monitoring of publications related to the activities of the MoIA and its subordinate bodies in the mass media and on social media platforms to ensure timely responses to issues raised, to analyse the content and trends of publications, and to assess compliance with legally established requirements regarding the timeliness and quality of responses to public inquiries. Authorities also note that a total of 467 and 452 inquiries were received in 2024 and 2025 (as of 20<sup>th</sup> December), respectively. All of these inquiries received a response.
87. Regarding part (ii) of this recommendation, the authorities indicate that the following information is regularly published: (1) disciplinary proceedings conducted by the Internal Security and Anti-Corruption Department, including the types and number of disciplinary sanctions imposed, disaggregated by subordinate bodies, structural units, offices, and subordinate organisations of the MoIA; (2) disciplinary proceedings initiated in cases of serious disciplinary violations committed by police officers and the decisions adopted as a result thereof; (3) high-profile cases, while ensuring public awareness and simultaneously safeguarding the confidentiality of personal data of the individuals concerned. At the same time, in implementation of the measures stated in the Police Reform Action Plan for 2024–2026, the annual Anti-corruption Action Plan of the MoIA was published on the official website of the MoIA.
88. Regarding part (iii) of this recommendation, the authorities note that a number of training courses have been conducted to enhance communication skills and to deepen knowledge related to the proper processing, presentation, and public dissemination of information among staff of the Public Communication Department. These sessions included: a training for mass media representatives aimed at improving cooperation between law enforcement agencies and the media; discussions on how to develop communication capabilities and opportunities; a five-day strategic crisis communication training, with the participation of staff from the Public Communication and Awareness Department, as well as territorial units of the Police and the Rescue Service; and a strategic communication training for the territorial subdivisions of the Police and the Rescue Service of the MoIA. Moreover, similar training sessions for the personnel of the Ministry subdivisions were held in all the regions in 2025 with the objective of strengthening the capacities of the territorial units of the Police and the Rescue Service, enabling them to ensure clear, timely, and professional communication with the public and representatives of the media during incidents, emergencies, and other crisis situations.
89. GRECO welcomes the targeted measures taken to address the various components of recommendation xiii. More particularly, it welcomes the adoption of the 2024-2026 Strategic Communication Programme for Police Reforms. The Programme analyses the importance of communication by the Police and the different avenues to enhance it *vis à vis* different stakeholders such as citizens, mass media and public and private sector partners. It also contains an action plan with clear deadlines, outcomes and responsible bodies for their implementation. This is a positive development to ensure that the Police shares information proactively and that it reaches a wide range of stakeholders.

GRECO also welcomes the training and discussion sessions organised to enhance communication skills and information handling within the Public Communication Department. Finally, GRECO notes that statistics on disciplinary proceedings are publicly available.

90. GRECO concludes that recommendation xiii has been implemented satisfactorily.

Recommendation xiv

91. *GRECO recommended adopting a dedicated and operational anti-corruption action plan based on systematic and comprehensive review of risk prone areas, accompanied by targeted mitigating and control measures and structures, which are subject to regular evaluation and impact assessment.*
92. The authorities report that a comprehensive integrity risk assessment process was carried out within the MoIA, covering several strategic and methodological dimensions, including 1) analysis of the legal framework related to integrity within the MoIA; 2) development of a tailor-made integrity (corruption) risk assessment methodology, providing tools for identifying and managing risks at both the institutional level and the level of individual units; 3) definition of assessment areas, development of criteria, and creation and pilot application of an appropriate digital data collection tool; and 4) development of an integrity roadmap and targeted action plan aimed at risk mitigation and the introduction of preventive mechanisms. The integrity (corruption) risk assessment methodology has been developed and is currently being piloted in a real working environment.
93. Based on the results of the risk assessment and taking into account the MoIA's priorities in the field, the Annual Anti-Corruption Action Plan of the MoIA for 2026 was developed and approved by the order of the MoIA. The objective of the Plan is to establish a systematic and comprehensive process for the identification, analysis, prevention, and effective management of corruption risks. It also aims to enhance transparency and accountability within the MoIA and to foster an environment based on integrity, honesty, and public trust. The Annual Anti-Corruption Action Plan was also approved for 2025, and it is envisaged that anti-corruption action plans will be adopted in advance for each subsequent year.
94. GRECO welcomes the integrity risk assessment and the Annual Anti-Corruption Action Plan of the MoIA for 2026 developed as a result of it. The Plan contains actions related to, *inter alia*, the identification and prevention of integrity- and corruption-related risk factors during and after service examinations and the improvement of the system for early detection, prevention and prompt response to corrupt behaviour as well as planned and thematic inspections to prevent and control corruption risks in the MoIA. GRECO trusts that the authorities keep these strategic tools under regular review and refinement, as appropriate.
95. GRECO concludes that recommendation xiv has been implemented satisfactorily.

96. *GRECO recommended that (i) a Code of Conduct for the police be adopted in order to address modern challenges of policing and cover in detail all relevant integrity matters, as well as to offer practical guidance through clear hands-on examples; and (ii) that it be published and accompanied by effective awareness-raising and confidential advisory measures.*
97. The authorities report that the Law on the Police Conduct and Disciplinary Code was adopted, establishing unified principles governing integrity, professional conduct, accountability, and disciplinary procedures for police service members. The Law constitutes the fundamental legal basis for introducing new standards of integrity and service ethics within the police system. Based on the Law and deriving directly from its provisions, the Police Code of Conduct was developed. It establishes professional conduct standards, mandatory integrity requirements, and a framework for honest and accountable conduct. It also outlines the principles for ethical communication with the public. The Code establishes core principles, provides specific regulations for managerial staff, explains how to manage and navigate conflict-of-interest situations, sets out clear prohibitions on the acceptance of gifts, and introduces a range of other important regulatory provisions. The Code of Conduct has been published in the official website of the Ministry of Internal Affairs and other relevant platforms. In addition, its adoption, scope, and key provisions have been widely communicated and discussed through various public and internal channels.
98. Regarding training and awareness-raising, the authorities note that, at the beginning of 2026, a curriculum for a dedicated subject titled “Code of Conduct” was finalised and approved. This course is delivered as a standalone subject, rather than as a component within broader training modules, and is included in the training programs of the Community Police, Criminal Police, Patrol Service, and the Police Guard. Since the beginning of 2026, a total of 1 984 officers has completed this subject. The training includes both theoretical components and scenario-based exercises, demonstrating conduct that complies with or violates integrity standards in concrete situations. They explain that the course is mandatory for all police personnel. Moreover, it was established under the relevant order of the Minister of Internal Affairs of the Republic of Armenia on the organization of annual mandatory trainings and is delivered in accordance with subject-specific thematic plans tailored to the respective groups, over a period of five days. In accordance with the aforementioned order, it is planned that an additional 5 500 officers approximately will undergo training in this course by the end of 2026.
99. With regard to confidential advisory measures, the authorities note that relevant functions related to integrity and ethics are assigned within the Ministry of Internal Affairs, including the provision of guidance on such matters, where necessary, on a confidential basis. In practice, integrity-related issues are addressed through designated officials responsible for ethics and integrity matters, who are involved in the relevant areas of work within the Ministry and provide guidance to staff as needed.
100. GRECO takes note of the adoption of the Police Code of Conduct. The Code regulates several integrity and ethics-related matters such as transparency and accountability,

conflict of interest management or the prohibition of accepting gifts. GRECO trust that the Code will take into account the constantly evolving challenges of the modern world concerning policing, as highlighted in the Evaluation Report (paragraphs 232 and 233).

101. Regarding part (ii) of this recommendation, GRECO welcomes the publication of the Police Code of Conduct. Armenia's efforts to raise awareness among the Police of the content and obligations contained in the Code of Conduct, notably through the development and implementation of a mandatory course on the topic, are also welcomed developments. GRECO trusts that the course will include practical guidance through clear hands-on examples on the implementation of the code.
102. GRECO concludes that recommendation xv has been implemented satisfactorily.

#### Recommendation xvi

103. *GRECO recommended developing an advanced training programme for all police officers focusing on proactive testing of ethics and values, awareness of new challenges, and legislative updates.*
104. The authorities report the establishment of a new unified Educational Complex of the MoIA, which introduced a fundamentally new approach to the initial training and continuous professional development of Police and Rescue Service personnel. The educational and teaching methodology has been comprehensively revised, placing a strong emphasis on practical training, the analysis of frequently encountered and challenging real-life cases and situations, and the use of interactive learning methods.
105. The authorities also note that a training program on police officers' ethics and integrity has been developed at the Educational Complex of the MoIA and covers key topics, including the importance of integrity in police service; corruption as a source of the erosion of integrity; the application of ethical rules during and outside of service; the assessment and identification of corruption risks, as well as the steps to be taken in response; and the disciplinary investigation process, its grounds, types of liability, and procedures for reporting. The objective of the program is to ensure that officers' knowledge corresponds to contemporary challenges, to strengthen the culture of integrity and the capacities for identifying and countering risks, as well as to enhance each officer's professional responsibility in the fight against corruption. The program is included in the overall training process for all police officers.
106. The authorities also report that, in 2024, a separate, in-depth professional educational program was developed for the newly established Criminal Police for the first time. The program includes sector-specific, professional, and integrity-related topics and represents an important step toward strengthening the professional capacities of criminal police officers and ensuring integrity in high-risk areas. In parallel, a series of training courses have been conducted specifically for the Police leadership. The aim of these courses was to strengthen awareness of integrity and to improve managerial, communication, and decision-making skills. In addition to the above-mentioned core educational program, additional training sessions are regularly organised in this field to enhance capacities for conducting proactive and preventive checks at both managerial

and staff levels, and particularly for officers of the Internal Security and Anti-Corruption Department.

107. Regarding the attendance of officers to relevant training courses, the authorities report that the Ministry of Internal Affairs attaches primary importance to the continuity and regularity of education and training of police officers. For this reason, annual training programs are mandatory for all police personnel without exception. In 2025, the attendance rate for training programs reached approximately 99%, as confirmed by official attendance records. Participation is strictly monitored, and completion of the training is not possible without proper attendance.
108. GRECO takes note of the establishment of the new, unified MoIA Educational Complex and welcomes the revision of the educational and teaching methodology used, notably the increased focus on practical training and the analysis of common cases and situations, including regarding integrity-related matters in basic and advanced (targeted at high-risk and senior positions) training modules. The high level of attendance of police officers to training is also a very positive development. GRECO trusts that Armenia will continue to ensure such wide participation.
109. GRECO concludes that recommendation xvi has been implemented satisfactorily.

#### Recommendation xvii

110. *GRECO recommended (i) strengthening integrity checks during staff recruitment and (ii) systematically carrying out routine vetting during an officers' police career, based on proactive checks, rather than reactive intelligence checks.*
111. The authorities report that the Law on the Police Conduct and Disciplinary Code introduces new and more effective mechanisms for monitoring the integrity of police officers. Specifically, the law stipulates that the Internal Security and Anti-Corruption Department of the MoIA is responsible for conducting regular integrity checks on police officers, both prior to their entry into service and during their tenure. Integrity checks can be conducted both on a planned basis (carried out at established intervals throughout an officer's career) and on an unplanned, surprise basis (when necessary, in cases of identified risks, behavioural deviations, or other grounds, as well as on a random basis among a certain group of officers for preventive purposes). In implementation of this regulation, the Minister of Internal Affairs adopted an order on "On Approving the Procedure for Conducting Integrity Checks of Police Officers". This regulation defines the key provisions related to integrity checks, the purpose and grounds for conducting such checks, the types of integrity checks and their procedures, as well as the analysis and use of the results of integrity checks, among other matters.
112. The authorities further explain that the grounds for initiating an integrity check are based on information indicating the existence of certain risks. Notably, the trigger for such measures is the presence of risk, rather than an established violation. In this context, even preliminary indications or concerns may be taken into account in assessing potential risks. At the same time, the authorities underline that integrity testing in this framework is designed as a preventive mechanism. Moreover, the concept of "risk" is interpreted broadly and allows for the initiation of integrity checks not only in relation

to specific situations, but also on a regular and, where appropriate, random basis for preventive purposes.

113. GRECO welcomes the upgrades made to the integrity vetting system. The Law on the Police Conduct and Disciplinary Code provides for the conduct of integrity checks on police officers, upon recruitment and during service, by the Internal Security and Anti-Corruption Department of the MoIA. However, GRECO believes that it is too early to assess whether proactive integrity checks are systematically carried out in practice. GRECO looks forward to receiving statistics on the number of integrity checks carried out under the current framework, as well as information on their nature.

114. GRECO concludes that recommendation xvii has been partly implemented.

Recommendation xviii

115. *GRECO recommended that a study be conducted concerning the activities of police staff after they leave the police and that, if necessary, in the light of the findings of this study, rules be established to ensure transparency and mitigate the risks of potential conflicts of interest in this respect.*

116. The authorities note that the Law on Police Service and the Law on Police Conduct and Disciplinary Code, provide for post-employment restrictions. In accordance with these provisions, police officers are prohibited from being employed by or becoming an employee of an organisation over which they exercised direct supervision during the final year of their service for a period of one year after leaving office. Authorities also recognised that, as the existing regulations alone were not sufficient, within the framework of the Police Reforms Action Plan for 2024–2026, an in-depth study was conducted on post-employment restrictions. The study was carried out on the basis of international standards, including the GRECO recommendations and a comparative analysis of best practices from six member states of the Council of Europe. Based on the results of the study, the MoIA has developed and circulated a draft package of legislative amendments aimed at improving the institution of post-employment restrictions, ensuring its full applicability, and introducing more effective oversight mechanisms in line with international best standards. The draft regulates issues related to conflicts of interest arising from employment after leaving the police service, establishes more extensive restrictions on accepting other employment, introduces cooling-off periods in specific cases, and provides for a number of other detailed regulatory measures.

117. GRECO takes note of the information provided by the authorities. GRECO welcomes the development of a comparative study on post-employment in the police and the identification of several areas for improvement. These include, in particular, introducing a personalised cooling-off period for senior police officials with substantial decision-making powers, amending the LPS to clearly define the scope and duration of post-service obligations, and requiring senior officers to submit a declaration of financial interests during the cooling-off period. GRECO awaits further information on the actual adoption and implementation of the proposed measures, particularly as tailored to the situation in the country.

118. GRECO concludes that recommendation xviii has been partly implemented.

#### Recommendation xix

119. *GRECO recommended that the Internal Security and Anti-Corruption Department of the police be provided with adequate material, financial and personnel resources to perform its tasks proactively and efficiently.*
120. The authorities note that, in 2023, the MoIA established the Internal Security and Anti-Corruption Department, which is the primary structural unit responsible for the anti-corruption sector and operates under the direct authority of the Minister of Internal Affairs. As a department that conducts studies, inspections, disciplinary investigations, and operational-investigative activities within the Ministry, its subordinate state bodies, and affiliated organisations, the Department pursues the core objectives of strengthening public trust in the MoIA and the Police, preventing potential violations of disciplinary, ethical, and integrity rules by personnel, identifying every instance of disciplinary, ethical, and integrity violations, and eliminating the underlying causes and contributing conditions of such violations. As a result of structural changes, the Department's staffing levels have been significantly increased, with the aim of ensuring adequate human resources for the proper performance of its functions. The staffing level of the Internal Security and Anti-Corruption Department has increased from 64% in the previous year to 67%. Efforts are underway to ensure the Department is fully equipped with the necessary property, technical equipment, and tools.
121. GRECO takes note of the information provided and the strengthening of the human resources of the Internal Security and Anti-Corruption Department. Even so, 33% of the posts remain vacant, which is a significant proportion. No information has been received on the enhancement of the Department's material and financial resources. GRECO considers that more needs to be done to meet the recommendation and looks forward to further developments in this respect.<sup>6</sup>
122. GRECO concludes that recommendation xix has been partly implemented.

#### Recommendation xx

123. *GRECO recommended (i) disabling the ability of the whistleblower to report matters to his/her first line supervisor to better protect whistleblower anonymity; (ii) further developing internal reporting channels, including by adopting procedures for receiving and processing reports that guarantee whistleblowers' confidentiality; and (iii) raising awareness on both internal and public facing whistleblowing channels and protection mechanisms to promote and incentivise whistleblowing in the police.*
124. The authorities report that the Ministry of Justice has developed a draft amendment to the Law on the Whistleblowing System. This draft was circulated among relevant stakeholders, refined on the basis of comments received and submitted to the Office of

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<sup>6</sup> The Armenian authorities informed GRECO during the course of its 103rd Plenary Meeting that significant additional resources, including financial, material and personnel, had been provided to the Internal Security and Anti-Corruption Department. This development, together with additional information to be provided by Armenia, will be reflected in the next compliance report.

the Prime Minister, where its finalisation is ongoing. The authorities also refer to a discussion held on 16 September 2025 with representatives of relevant state bodies and civil society organisations on improving the whistleblowing system and implementing the relevant measures under the Anti-Corruption Strategy and its 2023–2026 Action Plan.

125. Regarding part (i) of the recommendation, the authorities state that the draft amendments would remove the obligation for internal whistleblowing to be carried out through the direct line supervisor, thereby reducing the risk of identification and strengthening the protection of whistleblower anonymity. Moreover, the authorities note that the framework provides for multiple reporting avenues, including mechanisms that ensure full anonymity, allowing whistleblowers to submit reports without any involvement of their direct supervisor or any other hierarchical level.
126. Regarding part (ii) of the recommendation, the authorities indicate that the draft amendments would oblige internal reporting bodies to establish internal reporting channels and procedures guaranteeing the confidentiality of whistleblowers and the proper, objective handling of reports. They further report that, pursuant to the existing Law on the Whistleblowing System, responsible persons have been designated within the MoIA and its subordinate bodies to ensure the proper registration and formalisation of internal and external whistleblowing reports.
127. Regarding part (iii) of the recommendation, the authorities report that the annual statistical report on whistleblowing reports for 2025 has been published on the website of the Ministry of Internal Affairs. The same website provides access to the unified electronic whistleblowing platform and information on the whistleblowing procedure and available reporting mechanisms is regularly published. They also note that the handbook *Your Digital Right to Whistleblow* has been disseminated to heads of structural units of the Ministry and its subordinate bodies, and that explanatory letters containing assurances about the confidentiality of whistleblowing reports are regularly circulated. The authorities add that the Internal Security and Anti-Corruption Department received 11 whistleblowing reports in 2024 and 18 in 2025 (of which 9 qualified as whistleblowing reports). During the first trimester of 2026, the Ministry of Internal Affairs received five whistleblowing reports, of which one was forwarded to Anti-corruption Committee, in one case a review is being conducted and three did not lead to further action.
128. GRECO takes note of the information provided. Regarding part (i) of the recommendation, GRECO notes that the draft amendments to the Law on the Whistleblowing System would remove the possibility for whistleblowers to report to their immediate superior. Instead, they would be required to report to their immediate superior's supervisor, to another person supervising the superior's supervisor, or to a person authorised by the head of a competent authority. Pending the adoption of the draft amendments, this part of the recommendation is partly implemented.
129. Regarding part (ii) of the recommendation, GRECO notes that the draft provided by the authorities contains a general obligation for the relevant bodies to establish internal whistleblowing procedures, ensuring the confidentiality and the proper examination of reports. This is a relevant step in the right direction. GRECO observes, however, that the

draft amendments have not yet been adopted and no concrete internal procedures for receiving and processing reports were provided for review beyond the general legislative proposal. Therefore, GRECO cannot consider part (ii) of the recommendation implemented.

130. Regarding part (iii) of the recommendation, GRECO welcomes the awareness-raising and information measures reported by the authorities. It notes in particular that the handbook *Your Digital Right to Whistleblow* explains the use of the unified electronic whistleblowing platform and the anonymity safeguards attached to it. The increase in the number of whistleblowing reports received is also an encouraging sign, pointing at greater trust in the system. GRECO encourages the authorities to keep police officers aware of the anticipated upgrades to the system, once adopted, including through training and awareness-raising initiatives. This part of the recommendation can be considered to have been dealt with in a satisfactory manner.
131. GRECO concludes that recommendation xx has been partly implemented.

Recommendation xxi

132. *GRECO recommended ensuring that the role of the Ombudsperson on whistleblower protection be made fully operational in practice.*
133. The authorities report that the legislation in force vests the Human Rights Defender with powers relating to whistleblower protection, including the provision of confidential consultations and legal assistance to whistleblowers. In addition, the draft amendment to the Law on the Whistleblowing System would enhance legal clarity by clearly designating the Human Rights Defender as the responsible authority for whistleblower protection. The authorities further acknowledge that the allocation of at least three staff members to the Office, and consequently the establishment of a dedicated unit, is deemed essential as it would enable the Office to provide full protection to whistleblowers as envisaged under domestic and international legal instruments. They also explain that, following the adoption and entry into force of the legislation, the necessary institutional, human and financial resources will be allocated to the Human Rights Defender's Office to ensure the effective implementation of its mandate.
134. The authorities further indicate that coordination of activities relating to the protection of whistleblowers' rights within the Human Rights Defenders' Office is carried out by a designated representatives and that the Defender summarises and publishes whistleblowing-related information and statistics in the annual report. Moreover, the Office has undertaken various awareness-raising activities, including visits, discussions, a video published in November 2025 and a public radio programme in December 2025.
135. GRECO takes note of these developments. Regarding the legal amendment noted by the authorities, GRECO recalls that the Evaluation Report did not express concerns regarding the functions of the Human Rights Defender's (Ombudsperson) Office, but rather on whether the arrangements in place, in particular the human resources allocated to this authority (at the time of the visit, one staff member) were sufficient to enable the effective discharge of its functions (see paragraph 292). In this regard, GRECO notes that the authorities acknowledged that the current resources of the Ombudsperson's Office

are still insufficient for the effective and full implementation of its whistleblower-protection mandate and that additional staff positions and a dedicated unit are considered necessary. This acknowledged lack of resources has yet to be addressed.

136. GRECO concludes that recommendation xxi has not been implemented.

Recommendation xxii

137. *GRECO recommended ensuring independent and effective investigation of serious police misconduct incidents, regardless of their initial legal classification (criminal/non-criminal).*
138. The authorities report that, following the establishment of the MoIA, the Police no longer have a structural unit vested with the function of conducting internal or disciplinary investigations. These functions are now exercised by the Internal Security and Anti-Corruption Department of the MoIA, which is institutionally separate from Police subdivisions and includes specialised units responsible, *inter alia*, for investigations concerning Police officers. The authorities add that internal or disciplinary investigations may be initiated whenever information regarding an alleged violation becomes known, regardless of the source of such information, including inspections, media publications, anonymously submitted whistleblowing reports and other sources. The determination of violations and the imposition of disciplinary sanctions are not carried out by the Department or any other structural unit of the Ministry but are entrusted to an independent Disciplinary Commission. The Commission operates on the basis of the relevant legal framework and includes both representatives of the Ministry and civil society members, acting autonomously and adopting decisions through open voting, which are binding on the Minister. Where the facts disclosed appear to give rise to criminal liability, the relevant materials are transmitted to the Investigative Committee.
139. Regarding the practice followed by the Internal Security and Anti-Corruption Department upon receipt of information, the authorities explain that the system operates on the principle of immediate response. Whenever information is received indicating potential elements of a violation, the competent unit promptly initiates an examination/investigation, regardless of whether initial indications of criminal conduct are already evident. At this stage, all necessary procedural steps are undertaken without delay, including the collection of evidence, interviews with relevant persons, and, where appropriate, the initiation of forensic examinations, with the aim of determining the nature of the alleged violation. If it is established that the conduct constitutes a criminal offence, the materials are immediately transferred to the competent investigative authorities in accordance with the law.
140. The authorities further indicate that, in 2024, 1 911 internal investigations and reviews were conducted within the Department, of which 1 784 concerned Police officers, resulting in 632 disciplinary sanctions, including 561 against Police officers. During the first eleven months of 2025, 1 628 internal investigations and reviews were reportedly conducted, of which 1 488 concerned Police officers, resulting in 552 disciplinary sanctions, including 497 against Police officers. During the first quarter of 2026, the Department carried out a total of 531 disciplinary/internal investigations and reviews,

including 499 disciplinary/internal investigations. Of these, 458 concerned police officers.

141. GRECO welcomes the explanations provided by Armenia on the practice followed by the Internal Security and Anti-Corruption Department upon the receipt of information on potential rules violations. GRECO believes the application of the principle of immediate response is vital to ensure the effective investigation of serious police misconduct incidents and trusts that it will be applied to all cases, irrespective of their final legal classification. In addition, GRECO notes positively that investigative functions are no longer exercised within the Police itself, but by a specialised department situated outside the Police structure. This addresses the concern that the Police should not investigate themselves.
142. GRECO concludes that recommendation xxii has been implemented satisfactorily.

### III. CONCLUSIONS

143. In the light of the foregoing, GRECO concludes that Armenia has implemented satisfactorily six of the 22 recommendations set out in the Fifth Round Evaluation Report. Of the outstanding 16 recommendations, 15 recommendations have been partly implemented and one has not been implemented.
144. More specifically, recommendations i, xiii-xvi and xxii have been implemented satisfactorily, recommendations ii-xii and xvii-xx have been partly implemented and recommendation xxi has not been implemented.
145. With regard to top executive functions, GRECO welcomes the fact that Armenia has given due consideration to all recommendation and has taken positive steps to implement them, including those related to the regulation of the conduct of PTEFs, transparency in the procurement of ceremonial expenses, participation of civil society, lobbying, raising awareness among PTEFs of conflict of interest and the provision of adequate personnel resources to the Corruption Prevention Commission. In general, although more work is needed to fully implement almost all recommendations relating to top executive functions, GRECO encourages Armenia to continue its efforts and trusts that implementing planned measures will strengthen its anti-corruption framework.
146. With regard to law enforcement agencies, GRECO acknowledges with satisfaction the meaningful progress that Armenia has achieved in this area overall, particularly with regard to Police's transparency and communication, the adoption of an anti-corruption action plan, the training of police officers and the investigation of police misconduct. The recommendations related to those topics have been duly implemented. Furthermore, positive steps have been identified in relation to almost all recommendations, including on topics such as women's representation within the police force, integrity checks, post-employment restrictions and whistleblower protection. Despite these developments, additional measures and efforts are required to fully implement the recommendations. In this regard, GRECO notes that Armenia must pay particular attention to the recommendation regarding to the Ombudsperson's role in protecting whistleblowers, as this is the only recommendation that has not been

implemented, even partially. GRECO encourages Armenia to continue with its positive developments and efforts and looks forward to seeing further progress.

147. In the light of the foregoing, GRECO notes that further progress will need to be made within the next 18 months to achieve an adequate level of compliance with the recommendations. In accordance with Rule 31 revised bis, paragraph 8.2, of its Rules of Procedure, GRECO calls on the head of the delegation of Armenia to submit additional information with regard to the implementation of outstanding recommendations, namely recommendations ii-xii and xvii-xxi, by 31 December 2027.
148. GRECO invites the authorities of Armenia to authorise, at their earliest convenience, the publication of this report, and to make a translation of it into the national language available to the public.