

FIFTH EVALUATION ROUND

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

SECOND COMPLIANCE REPORT

SERBIA



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

I. INTRODUCTION

1. The fifth GRECO evaluation round concerns “Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies”.
2. This Second Compliance Report assesses the measures taken by the Serbian authorities to implement the recommendations made in the [Fifth Round Evaluation Report on Serbia](#) which was adopted by GRECO at its 90th plenary meeting (21-25 March 2022) and made public on 5 July 2022, following authorisation by Serbia. The corresponding [Compliance Report](#) was adopted by GRECO at its 97th Plenary meeting (21 June 2024) and made public on 4 July 2024, following authorisation by Serbia.
3. As required by GRECO’s Rules of Procedure,¹ the Serbian authorities submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 31 December 2025 and, along with additional information submitted on 12 May 2026, served as a basis for this Compliance Report.
4. GRECO selected San Marino (in respect of top executive functions in central governments) and Türkiye (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Ms Giovanna CRESCENTINI, on behalf of San Marino, and Ms Zehra Cansu ORHAN on behalf of Türkiye. They were assisted by GRECO’s Secretariat in drawing up this report.

II. ANALYSIS

5. GRECO addressed 24 recommendations to Serbia in its Evaluation Report. In the Compliance Report, GRECO concluded that recommendation xxii had been implemented satisfactorily, recommendations ii-vi, x, xiii, xvi, xvii and xxiv had been partly implemented and recommendations i, vii-ix, xi, xii, xiv, xv, xviii-xxi and xxiii had not been implemented. Compliance with these recommendations is dealt with below.

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

Recommendation i

6. *GRECO recommended laying down rules requiring that integrity checks take place prior to the appointment of ministers in order to identify and manage possible risks of conflicts of interest before joining government.*
7. GRECO recalls that this recommendation was not implemented in the Compliance Report, as no measures had been taken or planned at the time to comply with it.

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

8. The Serbian authorities now report that the Secretary General of the Government established a working group, composed of representatives of the Ministry of Justice, the Ministry of the Interior, the Ministry of Finance, the Ministry of Public Administration and Local Self-Government, the Republic Secretariat for Legislation, and the Agency for the Prevention of Corruption (APC), with the task of preparing an analysis of possible modalities for the prior verification of the integrity of public officials.²
9. GRECO takes note that a working group has been set up with the purpose of analysing possible ways to conduct integrity verification of public officials prior to their appointment. It notes that the specific actions of the draft 2026-2028 Action Plan³ for the implementation of the National Anti-Corruption Strategy for 2024-2028 include the “*preparation of an analysis on the modalities for introducing a preliminary integrity check for candidates applying for public office*” (Activity 4.4.1), which is intended to also cover candidates for ministerial positions in the government. While these developments go in the right direction, and the recently established working group has already held its first two meetings, no concrete results have been produced so far. It follows that GRECO cannot consider this recommendation as implemented, even partly.
10. GRECO concludes that recommendation i remains not implemented.

Recommendation ii

11. *GRECO recommended that (i) chiefs of cabinet and advisers (including of the President) undergo integrity checks as part of their recruitment in order to avoid and manage conflicts of interests; (ii) the names and area of competence of all advisers in Government and in the President’s cabinet be made public and easily accessible.*
12. GRECO recalls that this recommendation was partly implemented in the Compliance Report. No integrity checks had been put in place for chiefs of cabinets and advisers. As to the publication of information, the President’s website indicated the names and description of general tasks of the Secretary General, Chief of Staff, and the six advisors of the President. However, with regard to the Government, only the name of the Secretary General had been made public, while no names or areas of competence were indicated with respect to chiefs of staff and advisers of the Prime Minister, Deputy Prime Minister and ministers.
13. The Serbian authorities refer to the working group set up by the Secretary General of the Government (see paragraph 8 above), with the task of examining modalities for

² At first, in October 2025, an informal working group has been set up with participation of representatives of the General Secretariat of the Government, the Secretariat for Legislation, the Ministry of Justice, and the APC to examine possible legislative and practical solutions for integrity checks. Further, on 26 April 2026, the Secretariat General of the Government formally established a special Working Group, which held two meetings on 30 April and 8 May 2026. The APC prepared for the Working Group a draft analysis on pre-appointment integrity screening of candidates for public office, also drawing on the OECD Anti-Corruption and Integrity Outlook 2024 in its deliberations.

³ On 11 June 2026, the Serbian authorities informed GRECO that the Action Plan for the Implementation of the National Strategy for Fight against Corruption for the period 2026–2028 has been adopted on 4 June 2026. GRECO will assess this development with respect to relevant recommendations during the next reporting exercise.

introducing verification of the integrity of public officials. In addition, the Secretary General initiated amendments to the Decision on Special Advisers to Ministers (including the Prime Minister), stipulating that decisions on the appointment of special advisers or advisers are to be published in the Official Gazette, specifying areas of responsibilities of appointed persons. However, the adoption of the amendments of the Decision is contingent on adopting amendments to the Law on the Prevention of Corruption, which is yet to materialise.

14. GRECO takes note of the information provided. It notes the setting up of a working group, which intends to analyse possible steps towards ensuring verification of integrity of public officials prior to their appointment. GRECO also points to the *“adoption of rules for conducting integrity checks on chiefs of staff and advisors prior to their appointment”* (Activity 4.4.3) and the *“publication of the names and areas of competence of chiefs of staff and advisors on official websites of Government bodies”* (Activity 4.4.4), featuring among the specific measures in the draft 2026-2028 Action Plan for the implementation of the National Anti-Corruption Strategy. These intentions go in the right direction but still need to materialise in practice.
15. GRECO therefore concludes that recommendation ii remains partly implemented.

Recommendation iii

16. *GRECO recommended that (i) strategic documents for preventing corruption amongst all persons with top executive functions be adopted for the Government and the Presidential administration, on the basis of risk assessments, and made public; (ii) the role of the Agency for the Prevention of Corruption be strengthened by making public its recommendations and the response of the Government and Presidential administration.*
17. It is recalled that this recommendation was partly implemented in the Compliance Report. The adoption of the Integrity Plan for the Office of the President was the only tangible step reported with regard to the first part of this recommendation. The draft National Anti-Corruption Strategy was at a very early stage and had not, at that time, addressed integrity and corruption prevention amongst PTEFs. No other measures had been taken to adopt strategic documents covering PTEFs in the Government for preventing corruption, or to carry out risk assessments in this regard. Regarding the second part, although the Office of the President followed recommendations of the APC, no information was provided about the Government's response to such recommendations.
18. The authorities now submit that that the National Anti-Corruption Strategy for 2024-2028 (National Strategy)⁴ and its accompanying Action Plan for 2024-2025 have been adopted, and adoption of the draft 2026-2028 Action Plan is pending (see paragraph 9 above). Further, following the previously reported adoption of the Integrity Plan for the Office of the President, and the training on ethics and integrity conducted for its

⁴ The full text of the National Anti-Corruption Strategy, published on 26 July 2024, is accessible via the following link (in Serbian and in English): <https://mpravde.gov.rs/nacionalna-strategija-za-borbu-protiv-korucije-2024-2028>

employees in 2022, another training session on “Ethics and Integrity” was held in 2025 for the officials of the Office of the President, including those in most senior positions (32 participants in total, including the Head of the Office, Secretary General and three advisors of the President). Finally, the draft amendments to the Law on Prevention of Corruption (LPC) envisage requiring public administration authorities — to which the APC has recommended measures to eliminate corruption risks or to align regulations with international anti-corruption instruments — to inform the APC within 30 days either of their acceptance of the required action or initiative, or of the reasons for declining to act (proposed new wording of Article 35 of the LPC). In addition, the draft amendments would require public administration authorities to submit to the APC statements responding to the APC’s corruption risk assessments of draft legislation prepared or initiated by these authorities.

19. GRECO takes note of the information submitted by the authorities. It welcomes the adoption of the National Anti-Corruption Strategy for 2024-2028, which has been made public.⁵ With regard to the first part of this recommendation, GRECO notes that the National Strategy acknowledges the need to address the prevention of corruption among highest-ranking officials in the executive through a dedicated strategic document,⁶ which is a promising signal. GRECO also points to the adoption of the “*Rulebook on Whistleblowing for persons holding the highest executive positions*” (Activity 4.4.7), envisaged under the draft 2026-2028 Action Plan by the first quarter of 2026. However, no tangible steps have been taken so far to adopt a strategic document for preventing corruption amongst all PTEFs in the Government. As regards the second part, GRECO notes that the draft amendments to the LPC envisage mandatory reporting for public administration authorities to the APC on their action or inaction in response to the APC’s initiatives to eliminate the risks of corruption. However, the draft amendments do not indicate whether recommendations of the APC to the Government, and responses thereto, would be made public. Overall, as concrete final results have not been achieved yet on either part of this recommendation, GRECO cannot consider it as implemented more than partly.
20. GRECO concludes that recommendation iii remains partly implemented.

Recommendation iv

21. *GRECO recommended that (i) the remit of the Law on Prevention of Corruption be expanded to cover all persons with top executive functions (PTEFs), including the Prime Minister’s and Deputy Prime Ministers’ chiefs of cabinet as well as special and*

⁵ The National Strategy aims at strengthening the regulatory and institutional framework, enhancing transparency, reinforcing integrity, and raising awareness through overarching measures to be implemented by designated authorities in central government, including the APC, the Ministry of Justice, the Ministry of the Interior etc. Ultimately, the objective of the Strategy is the continuous commitment of public authorities and political entities to the suppression of corruption and the efficient and consistent implementation and continuous improvement of anti-corruption rules, timely detection and adequate punishment of corrupt behaviour and strengthening of awareness of the causes, state and harms of corruption.

⁶ In particular, the National Strategy indicates that “*through the Action Plan for the period 2026–2028, it is necessary to foresee activities that include an analysis of the needs and possibilities for the possible adoption of a strategic document for the prevention of corruption among highest-ranking executives, which would define a clear goal in preventing political corruption*”.

government advisers; (ii) a code of conduct applicable to PTEFs be adopted, covering integrity matters (e.g. conflicts of interest, contacts with lobbyists and third parties, post-employment restrictions, etc.), accompanied by sanctions for violations and appropriate practical guidance; and (iii) an appropriate document on conduct be developed for the President.

22. GRECO recalls that this recommendation was partly implemented in the Compliance Report. With respect to the first part of the recommendation, GRECO noted the authorities' intention to amend the LPC so as to include chiefs of cabinet, special and government advisers among "public officials". However, these amendments were not submitted to Parliament at the time. Regarding the second part, a code of conduct applicable to PTEFs in the Office of the President was adopted, but no such code was put in place for PTEFs in the Government or ministries. As to the third part, while the adoption of the Code of Conduct for officials in the Office of the President was recognised as a positive development, an appropriate document on conduct, addressed to the President, was still lacking.
23. The Serbian authorities now report that a draft Law on Amendments and Supplements to the LPC envisage, *inter alia*, to address the issues underlying this recommendation. They specify that the draft amendments to the LPC were submitted to the European Commission for opinion on 18 December 2025, and that the legislative procedure will resume upon receipt of the Commission's opinion. As regards the adoption of a dedicated code of conduct for the President, the authorities submit that the General Secretariat conducted the analysis of the existing legislation and concluded that, in view of the Constitution, the Law on the President, the LPC, and other relevant legal acts, the Office of the President is already covered by the integrity requirements. Therefore, the authorities consider that the adoption of a separate document with regard to the President would not be necessary, as it would merely repeat the already existing legal provisions. Nonetheless, the authorities submit that the General Secretariat of the President initiated contacts and exchange of information with the APC, the Permanent Mission of Serbia to the Council of Europe and other competent authorities to determine the procedure and scope for developing an appropriate document setting out standards of conduct for the President, taking into account the Constitution of Serbia, the Law on the President, other applicable legal regulations, as well as international standards and practices of other countries.
24. GRECO takes note of the information provided by the authorities. With regard to the first part of the recommendation, GRECO notes that the draft amendments to the LPC (Article 2) envisage introducing a more detailed definition of "public officials" to expressly cover heads of cabinets, advisers and special advisers of ministers, which would be a positive development. However, the amendments in question have not been submitted to Parliament yet. No information has been provided on any concrete steps with regard to the second part of the recommendation (adoption of a code of ethics for PTEFs). As to the third part, GRECO recognises that the issue has been examined by the authorities. However, GRECO recalls that this part of the recommendation does not necessarily require new legislation. Compiling relevant integrity commitments applicable to the President, for instance, in the form of a public statement of principles

(paragraph 42 of the Fifth Round Evaluation Report), could be an adequate step. For the time being, even if some preliminary considerations have been initiated, there continues to be no such document covering the President, who remains subject to relevant provisions of the Constitution and other applicable laws.

25. GRECO concludes that recommendation iv remains partly implemented.

Recommendation v

26. *GRECO recommended that the advisory role of the Anti-Corruption Council in the institutional framework to combat corruption be fully acknowledged by ensuring that the Government engages with it, that all vacant posts of the Council be filled and that cooperation with the Agency for the Prevention of Corruption be formalised.*
27. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO welcomed the signature of the Memorandum of Cooperation between the Anti-Corruption Council (ACC) and the APC and the enhanced coordination between the two institutions. It also noted participation of the ACC representatives in government-led initiatives. However, GRECO observed that the filling of all vacant posts in the ACC remained outstanding and encouraged the authorities to provide the ACC with adequate human resources to carry out its tasks.
28. The authorities now report that that above mentioned amendments to the LPC also envisage granting the ACC a special legal status to address the limitations stemming from its current status as an *ad hoc* advisory body of the Government,⁷ and defining eligibility criteria/procedures for the appointment of its members. However, the future role and tasks of the ACC do not appear to be determined yet. In addition, The ACC regularly reports to the APC on the implementation of activities under Chapter 23 of the Action Plan for the implementation of the National Anti-Corruption Strategy for 2024–2028. Finally, the authorities submit that in the course of November and December 2024, representatives of the APC and the ACC jointly attended trainings and conferences.⁸ ACC representatives also participated in international conferences dedicated to the development of anti-corruption mechanisms and institutional cooperation.⁹

⁷ For the time being, the ACC as a temporary working body of the Government regulated under the Government Rules of Procedure, is allowed to submit materials to the Government through line ministries only, and cooperation with other state authorities is possible solely through the competent state administration authority.

⁸ More specifically, a two-day training session on “Financial forensic”, conducted on 4-5 November 2024 and on “Stakeholders in anti-corruption initiatives”, conducted on 17-18 December 2024 by the International Anti-Corruption Academy (IACA) as part of the Project “Support to Strengthening the Rule of Law in the Republic of Serbia”, jointly funded by the European Union, the German Federal Ministry for Economic Cooperation and Development (BMZ), and the Austrian Development Cooperation (ADC), implemented by GIZ, ADA, CPMA, and the OSCE Mission to Serbia.

⁹ In particular, the International Conference dedicated to empowering the fight against corruption: the crucial role of institutional framework, held on 10 December 2024, and International Conference dedicated to strengthening anti-corruption mechanisms and developing institutional cooperation at the international level of 9 December 2025, both organised by the APC in cooperation with the OSCE Mission to Serbia.

29. GRECO notes that the well-established cooperation between the ACC and the APC continues in practice, with the regular reporting of the ACC on the implementation of the National Anti-Corruption Strategy and participation of representatives of both agencies in various events, which is clearly a positive trend. GRECO also takes note of the intention of the authorities to accord to the ACC a special legal status, but the specific modalities of its future role and functions have not been determined yet. In this regard, GRECO reiterates that the ACC should be able to engage in cooperation with the Government and other state administration bodies on its own initiative and its advisory role should be strengthened. Accordingly, GRECO encourages the authorities to take concrete steps in this direction. Finally, it appears that the vacant posts in the ACC have not been filled and no information was received on whether the ACC has been provided with adequate human resources to carry out its tasks.
30. GRECO concludes that recommendation v remains partly implemented.

Recommendation vi

31. *GRECO recommended that (i) systematic briefing and training on all integrity standards be provided to all persons exercising top executive functions upon taking office and at regular intervals; (ii) confidential advice be available to the Prime Minister's and Deputy Prime Ministers' chiefs of cabinets as well as special and government advisers.*
32. GRECO recalls that this recommendation was partly implemented in the Compliance Report. GRECO noted that the APC continued to provide awareness-raising to public officials regarding ethics and integrity, and that some PTEFs had been attending training activities on these subjects. GRECO also welcomed a new training programme for PTEFs in preparation, which would cover anti-corruption matters, and noted steps towards its implementation. However, these initiatives had not been completed at the time, and systematic training and briefings on integrity standards for all PTEFs upon taking office and during their careers had not been established. Finally, GRECO noted that the remit of the LPC had not yet been expanded to chiefs of cabinets and special and government advisers, keeping them outside of reach of confidential advice by the APC.
33. The authorities now report that, following the adoption of a training programme for PTEFs (December 2023), the APC, in cooperation with the Office of the Prime Minister and the General Secretariat of the Government, has implemented three online training sessions entitled *"Integrity Standards of Public Officials through the Legal and Institutional Framework for Preventing Corruption"*.¹⁰ Further, in the course of 2025, 39 assistant ministers, 16 state secretaries, one minister and three special advisors of the President completed a training course on ethics and integrity, available on the Moodle platform. In addition, the authorities submit that the APC intends to develop an online training module for public officials, including PTEFs, under the Council of Europe Project

¹⁰ The first session was held on 8 November 2024 and was attended by 258 public officials, including PTEFs such as assistant ministers, directors of bodies within ministries, assistant directors of special organisations, and assistant directors of Government services. The second training was conducted on 27 May 2025 for 20 newly appointed ministers, and the third on 16 December 2025 for an additional 6 ministers.

entitled “*Countering Economic Crime in Serbia*”, with the funding of the Swedish International Development Cooperation Agency.

34. GRECO welcomes the ongoing training initiatives on ethics and integrity issues conducted by the APC, with the increasing participation of PTEFs from different central government bodies, as well as the Office of the President, addressed to newly appointed senior officials, such as ministers, as well as PTEFs already in office. It also notes with satisfaction that further training activities are in the pipeline, aiming to involve all PTEFs. These developments allow GRECO to conclude that the first part of this recommendation has been complied with. As regards the second part, no new information has been provided. GRECO refers to the draft amendments to the LPC, aiming to expand the definition of “public officials” by including chiefs of cabinet, special and government advisers in this category and thus making confidential advice be accessible to them. As these amendments have not been adopted yet (see paragraph 24 above), this part of the recommendation remains outstanding.

35. GRECO concludes that recommendation vi remains partly implemented.

Recommendation vii

36. *GRECO recommended that (i) requests for information lodged with the Government or Presidential administration not receiving a positive response be subject to appeal before the Commissioner for Information of Public Importance and Personal Data Protection and (ii) enforcement of related decisions be kept under systematic review.*
37. It is recalled that this recommendation was not implemented in the Compliance Report. GRECO noted the opinion of the Commissioner for Information of Public Importance and Personal Data Protection (the Commissioner) on the need to enable individuals to appeal to the Commissioner against decisions of the Government and the Office of the President not granting requests for information. However, no measures were taken or envisaged to amend legislation to that effect, or to address this recommendation otherwise.
38. The Serbian authorities reiterate the legal provisions with regard to the Commissioner's competences and indicate that no appeals can be filed against decisions of the Government or the President with regard to refused requests for information (Article 22, Law on Free Access to Information of Public Importance). They refer again to the possibility of administrative appeals before a court and indicate that the 2021 legal amendments strengthened the powers of the Commissioner, enabling the imposition of fines on public authorities, which had a positive effect, according to the Commissioner's annual reports. The authorities express the view that the significant increase in the number of complaints filed with the Commissioner stems from the abuse of the right to access information, which they plan to address through consideration of possible legislative solutions. Finally, the authorities express the view that introducing appeal possibility against the Government with the Commissioner would be contrary to the principle of the Government being accountable to Parliament and, outside of the parliamentary control, its actions are only subject to judicial review.

39. GRECO takes note of the information provided by the authorities, which does not demonstrate any steps taken, or under consideration, towards the implementation of this recommendation.¹¹ GRECO notes that the Commissioner for Information of Public Importance and Personal Data Protection refers to “a massive abuse of the right to access information” in his Annual Report for 2024.¹² At the same time, the Commissioner points out that “in 2024, the right of journalists to access information was significantly hindered.”¹³ In 2024, for the first time, the Commissioner imposed fines for non-compliance with his decision and expressed concern with the fact “the public authority chose to pay the fine rather than comply with the Commissioner’s order to make the requested information available to the public.”¹⁴ Finally, the Commissioner’s Annual Report cites several examples of public authorities’ improperly invoking various reasons in their refusals to requests for information, such as unfounded invocation of business secrecy, or of privacy and personal data protection.
40. In addition, GRECO has come across several reports suggesting that access to information continues to be difficult in Serbia, with persisting refusals to provide information on the part of public authorities, in particular, when such requests are submitted by journalists.¹⁵ Against this background, GRECO is concerned that requests for information lodged with the Government or the Office of the President, if not granted, still cannot be appealed to the Commissioner.¹⁶ GRECO regrets that no legislative or practical measures have been taken to address the shortcomings

¹¹ The legal provisions referred to by the authorities in the additional comments submitted on 12 May 2026 have already been taken into consideration at the time of the evaluation.

¹² In his 2024 Annual Report, the Commissioner states, in particular, that he had “a total of 20,012 complaints under review in 2024, which is the highest number of active complaints in progress since the establishment of the Commissioner’s institution. The total number of cases in the field of free access to information amounted to 31,792, which is also the highest number of active cases in progress in this area since the establishment of the Commissioner’s institution.” The 2024 Annual Report of the Commissioner is accessible via the following link (in English): https://www.poverenik.rs/images/stories/dokumentacija-nova/izvestajiPoverenika/2024/ANNUAL_REPORT_2024.pdf

¹³ The Annual Report for 2024 states that “as many as 40.98% of journalist complaints lodged with the Commissioner in 2024 were due to the “silence” of public authority bodies is of particular concern.” Further, the Annual Report continues to say that “Not only is the percentage of the Commissioner’s unenforced decisions on journalists’ complaints are significantly higher compared to the general trend of unenforced decisions concerning other complainants, but this also carries particular additional weight because journalists—who by the nature of their work report on topics of exceptional public importance and act in the public interest—are being denied very sensitive information, such as environmental data, information about major projects, management of public funds and resources, co-financing of media projects, legalisation of illegally constructed buildings, and the like.”

¹⁴ For one of the decisions imposing a fine, there is no information on whether the fine was paid, while the other fine was paid by the enforcement debtor, i.e. the first-instance authority – Ministry of Economy.

¹⁵ According to the European Commission’s 2025 Rule of Law Report, Country Chapter on Serbia, “the fact that the Commissioner for Information of Public Importance cannot directly enforce the execution of its decisions by coercive action remains one of the main obstacles to the exercise of free access to information” (page 12). The full text of the 2025 Rule of Law Report on Serbia is accessible via the following link: https://commission.europa.eu/publications/2025-rule-law-report-communication-and-country-chapters_en

¹⁶ GRECO reiterates its observations made in paragraph 56 of the Fifth Round Evaluation Report on Serbia, notably “that there is no appeal possible with the Commissioner for Information of Public Importance and Personal Data Protection for decisions of the President and Government, the only option being to bring a case before administrative courts, which may well have a chilling effect given the financial burden and time required by judicial procedures”.

underlying this recommendation and calls on the Serbian authorities to take action in this regard with no further delay.

41. GRECO concludes that recommendation vii remains not implemented.

Recommendation viii

42. *GRECO recommended that (i) laws emanating from the Government be systematically submitted for public consultations, and (ii) revised bills presented before the National Assembly be systematically accompanied by an explanatory note giving the legislative footprint of the draft law.*
43. GRECO recalls that this recommendation was not implemented in the Compliance Report, as no measures were reported by the authorities to address it, and the legislation referred to by the authorities was already taken into consideration at the time of the evaluation.
44. The Serbian authorities now report that on 27 November 2025, the Government amended and supplemented its Rules of Procedure to stipulate that it is now the Government, rather than the relevant government committee, that decides whether to conduct a public consultation (referred to as “public debate”) on a draft law or planning document, or to exempt it.¹⁷ The public debate is now formally linked to the Governmental consultation process and is defined as the final phase of public engagement,¹⁸ allowing in some cases for the exemption from public debate, if prior consultations have already been conducted. Finally, the amendments to the Government Rules of Procedure also aim at a more active engagement between the government body proposing draft legislation and other competent bodies in cases where an issue arising during public debate directly relates to the latter body’s competence.
45. GRECO notes the recent adoption of the amendments to the Government Rules of Procedure and the authorities’ efforts to streamline the public consultation procedure, enhance the engagement of other government bodies in the process, clarify circumstances when public debates should be conducted, and situations when the Government can decide to renounce them, upon reasoned proposal. In this regard, GRECO recalls that, at the time of the evaluation, the margin of interpretation of the provisions allowing to determine when a public debate should be conducted was considered as too broad and did not ensure that such debates are systematically conducted for all draft legislation emanated from the Government.¹⁹ GRECO also notes

¹⁷ According to the authorities, it is thereby intended to elevate the decision on conducting a public consultation to a higher political level and ensure that all members of the Government, and not just members of the committees, are informed of the draft and forthcoming public consultation process.

¹⁸ The authorities note that the institution of public consultation has existed for over twenty years, and that, following legislative reforms in 2018, the consultation process with the interested public was further formalised to cover the early stage of document preparation, mainly via the e-Consultations Portal.

¹⁹ In particular, in paragraph 62 of the Fifth Round Evaluation Report on Serbia, it was noted that “*the existing criteria for making public debate compulsory (“significant changes” and “matter of particular public interest”) give an overly broad margin of interpretation that provides ways of circumventing the obligation to hold public debates.*”

that since the amendments to the Government Rules of Procedure (from November 2025 up to April 2026), the percentage of draft legislation emanating from the Government on which public debates have been conducted has been increasing.²⁰ However, while the streamlining of public debates through the recent amendments to the Government Rules of Procedure, and an increasing use of this procedure in practice are promising developments, the Government maintains the possibility not to conduct public debates on the basis of the provisions that remain open to broad interpretation (Article 41 of the Rules of Procedure),²¹ which falls short of the requirements of the first part of this recommendation.²² As to the second part, GRECO received no information as to whether draft legislation submitted by the Government to Parliament is systematically accompanied by explanatory note, displaying the legislative footprint²³ of the draft legislation in question. Overall, GRECO considers that this recommendation has been implemented only to some extent.

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

Recommendation ix

47. *GRECO recommended that (i) the notion of lobbying encompassed in the Law on Lobbying be expanded to cover contacts with persons with top executive functions (PTEFs) whether they have been formalised in a written request or not; (ii) contacts between PTEFs and lobbyists/third parties that seek to influence the public decision-making process be disclosed as well as the names of the participants and the subject-matters discussed.*
48. It is recalled that this recommendation was not implemented in the Compliance Report. GRECO noted the authorities' intention to amend the Law on Lobbying with a view to reflect the requirements of the recommendation, but the process had not even started at the time.
49. The Serbian authorities now report that on 18 December 2025, the draft law on amendments to the Law on Lobbying has been submitted to the European Commission for opinion, and that the legislative procedure will resume upon receipt of the Commission's opinion. The draft amendments, *inter alia*, stipulate that the lobbied person will be obliged to prepare a notification on the receipt of a notice referred to in

²⁰ According to the authorities, in 2025, prior to amendments of the Government Rules of Procedure, public debates were conducted with respect of 35 draft laws emanating from the Government and were not conducted for 29 such drafts. Since the amendments to the Rules of Procedure, public debates were held for 18 draft laws and not conducted for 4 such drafts.

²¹ In particular, Article 41, paragraphs 2) and 3) still maintain a possibility for the Government to not conduct a public debate in the context of preparing a new law, should the competent committee so decide upon a reasoned proposal by the proposer, and when preparing amendments to a law, unless it *significantly changes* the solutions in the existing law, to be decided by the competent committee upon a reasoned proposal by the proposer.

²² More specifically, in paragraph 63 of the Fifth Round Evaluation Report on Serbia, it was noted that "*organising public debates for all drafts emanating from the Government should be the rule.*"

²³ Allowing to track all external interventions and contacts between PTEFs and other interest representatives from the beginning of the legislative process in order to establish a clear trail of influence on the legislation.

Article 26 of this Law²⁴ and *on any contact with a lobbyist* established in the course of lobbying, and to submit it to the APC within 15 days from the date of receipt of the notice or the date on which the contact with the lobbyist was established. Furthermore, the draft amendments to the LPC provide that the APC is to publish the notifications of the lobbied person on its website within 15 days of receipt on the notification, and that the lobbied public authority must immediately publish and update these records on its website.

50. GRECO takes note of the draft amendments to the LPC, which envisages that any contact with a lobbyist (and not only those made in writing) be notified to the APC, and that the APC, as well as the public authority subject to lobbying, disclose these notifications on their respective websites. GRECO believes that the adoption of these amendments would be a considerable step towards enhancing transparency of PTEFs' contacts with lobbyists and other third parties seeking to influence decision-making in the Government, corresponding to the first part of the recommendation. However, the draft amendments have not been submitted to Parliament yet. As to the second part, GRECO received no information as to whether information about PTEFs' contacts with lobbyists intended to be made public will contain the necessary level of detail (i.e. names of the participants and subject matters discussed). GRECO will review this aspect also in light of the practice of making such contacts public, once the proposed amendments to the LPC are adopted and enter into force. Overall, the process is still at a very early stage, and no tangible results have been achieved with regard to either part of this recommendation.

51. GRECO concludes that recommendation ix remains not implemented.

Recommendation x

52. *GRECO recommended that all ministries be equipped with fully functioning internal audit units.*
53. GRECO recalls that this recommendation was partly implemented in the Compliance Report. GRECO notes that internal audits had been set up in 23 ministries, but only 15 of them were functioning. Moreover, a significant number of vacant posts in internal audits were still to be filled.
54. The authorities now report that internal audits have been established in 25 ministries and 4 administrative bodies within ministries and are operational in 17 ministries²⁵ and 4 administrative bodies.²⁶ Across these bodies, 129 internal audit positions (including 94 internal audit positions in ministries) have been put in place, with 38 positions currently

²⁴ The full text of the Law on Lobbying is accessible via the following link: https://track.unodc.org/uploads/documents/BRI-legal-resources/Serbia/5_-Law_on_Lobbying.pdf

²⁵ According to the authorities, the internal audit function is still not operational in the Ministry of Foreign Affairs, the Ministry of Environmental Protection, the Ministry of Human and Minority Rights and Social Dialogue, the Ministry of Rural Welfare, the Ministry of Science, Technological Development and Innovation, the Ministry of Tourism and Youth, and the Ministry of Public Investments.

²⁶ According to the Consolidated Annual Report on the State of Public Internal Financial Control for 2024.

filled.²⁷ The situation regarding internal auditors in ministries is monitored by the Central Harmonisation Unit of the Ministry of Finance through yearly reporting, which also conducts *ad hoc* meetings with the ministries²⁸ and sends memorandums on the need to fill the vacant posts of internal auditors. The authorities indicate that difficulties in filling internal audit positions arise from a lack of suitable employees for redeployment, low salaries in the public sector, and the reduction in staff numbers resulting from departures due to retirement, resignation or other end of employment, without the immediate recruitment of replacements.

55. GRECO notes the moderate increase in the number of ministries (25 out of 33 ministries) with functioning internal audits. It welcomes the enhanced number of positions set up for internal audit services across ministries and recognises the difficulties to recruit staff with the necessary qualification to perform this task, as well as the impact of considerable staff turnover. That said, GRECO calls upon the authorities to ensure that functioning internal audit services are established in all ministries with no further delay, as this was already an urgent necessity at the time of the evaluation.²⁹ For the time being, not sufficient progress has been made to consider this recommendation as implemented more than partly.
56. GRECO concludes that recommendation x remains partly implemented.

Recommendation xi

57. *GRECO recommended that (i) all persons with top executive functions be required to disclose ad hoc conflicts of interest; and (ii) the exception whereby they are dispensed of doing so in case of “danger of delay” in the decision-making process be removed from the law.*
58. GRECO recalls that this recommendation was not implemented in the Compliance Report, as the authorities’ intention to abolish the exception allowing public officials to continue performing their functions in cases of possible conflict of interest had not materialised, and the requirement to disclose *ad hoc* conflicts of interest had not been expanded to all PTEFs.
59. The authorities refer again to the draft amendments to the LPC, submitted to the European Commission for opinion on 18 December 2025 (see paragraph 23 above), and indicate that the legislative procedure will resume upon receipt of the Commission’s opinion. The draft amendments, intend, on the one hand, expanding the definition of “public officials” to cover heads of cabinets, advisers and special advisers of ministers

²⁷ The Ministry of Economy and the Ministry of Family Care and Demography have concluded contracts with certified internal auditors in the public sector as a transitional solution until permanent staff are hired.

²⁸ In particular, in the beginning of May 2026, the Central Harmonisation Unit held meetings on this issue with the representatives of the Ministry of Health, Ministry of Defence, Ministry of the Interior, Ministry of Labour, Employment, Veteran and Social Affairs, Ministry of Economy, Ministry of Education and Ministry of Justice.

²⁹ Reference is made to paragraph 69 of the Fifth Round Evaluation Report on Serbia, which reads as follows: “The GET considers it urgent to ensure that each ministry is equipped with a functioning internal audit unit as a vital part of ensuring control on a routine basis at ministerial level and hence promoting integrity in ministerial use of public funds.”

and, on the other hand, removing the exception to *ad hoc* disclosure of a conflict of interest “where there is a danger of delay”.

60. GRECO notes that the draft amendments to the LPC envisage expanding the definition of “public officials” to cover chiefs of cabinet and (special and government) advisers, thereby making them obliged to declare *ad hoc* conflicts of interest,³⁰ and to remove the overly broad exception of “danger of delay” to this obligation. It would appear that the draft, in the current wording, would address both parts of this recommendation adequately. However, the draft amendments are still at an early stage and have not yet been submitted to Parliament.

61. Therefore, GRECO concludes that recommendation xi remains not implemented.

Recommendation xii

62. *GRECO recommended that post-employment restrictions rules apply to all persons with top executive functions, including the President, the Prime Minister's and Deputy Prime Ministers' chiefs of cabinets as well as special and government advisers.*

63. GRECO recalls that this recommendation was not implemented in the Compliance Report, as the provisions referred to by the authorities were in force at the time of the adoption of the Evaluation Report and were fully taken into consideration. No post-employment restrictions applicable to all PTEFs had been introduced or considered.

64. The Serbian authorities reiterate the provisions of the LPC regulating post-employment restrictions for public officials (Article 55) and confirm that, while they apply to other officials in the Office of the President, the position of the President, special advisers and advisers to the President, of the Vice President, and of ministers are still not covered by these restrictions. The authorities refer to the draft amendments to the LPC (see paragraph 23 above), which intend to capture these positions under the definition of “public officials” and would thus make the post-employment restrictions applicable to them. They recall that legislative procedure regarding these draft amendments will resume upon receipt of the opinion of the European Commission (see also paragraphs 49 and 59 above). In addition, the authorities provide statistical information from the APC for 2025 regarding permissions issued to former assistant ministers and state secretaries for employment or business cooperation in the private sector.

65. GRECO takes note of the information provided, and the intended resumption of the legislative process with regard to the draft amendments of the LPC, once the opinion of the European Commission has been received (see paragraphs 23, 49 and 59 above), which is expected to address the issue of post-employment restrictions applicable to PTEFs. This work is still at a very early stage.

66. GRECO concludes that recommendation xii remains not implemented.

³⁰ Paragraph 74 of the Fifth Round Evaluation Report noted that “the LPC does not cover the Prime Minister's and Deputy Prime Ministers' chiefs of cabinet and (special and government) advisers, who should also be subject to declaring *ad hoc* conflicts of interest.”

Recommendation xiii

67. *GRECO recommended that asset and income declarations of persons with top executive functions be subject to regular substantive control and that the Agency for the Prevention of Corruption be provided with adequate resources for that purpose.*
68. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO noted that the APC guidelines for drafting and approving annual verification plans had been updated, and the fact that out of the 66 PTEFs included in the verification plan for 2023, verifications were completed for 50, and the process was ongoing for the remaining 16. GRECO also noted that the verification plan for 2024 included 131 PTEFs and welcomed the notable increase of APC staff responsible for the verification of asset and income declarations. Further, GRECO noted the cooperation agreements in place between the APC and several other institutions, facilitating access to relevant information, as well as the training initiatives to improve the competences of APC staff in carrying out substantive verifications. However, as the substantive verification of asset and income declarations was conducted with respect of assistant ministers only, GRECO called upon the authorities to ensure that regular and substantive verifications declarations be further expanded to other categories of PTEFs, and to continue allocating adequate human resources to the APC for this task.
69. The Serbian authorities now report that as of 2024 until December 2025, verifications have been completed with regard of declarations of 96 assistants/acting assistant ministers and was ongoing for 35 assistants/acting assistant ministers. The authorities inform that the 2025 Annual Verification Plan envisaged verification of declarations of 305 public officials (members of Parliament, judges of the Supreme Court, and chief public prosecutors). Further, analysis is ongoing regarding data of public officials whose declarations are to be included in the annual verification plans, as well as to determine the total number of officials subject to reporting obligations and their distribution across the branches of government. On the basis of this analysis, the APC intends to adopt by June 2026 an asset verification plan covering officials in the executive, legislative and judicial branches.
70. In addition, the authorities inform of the work is in progress to strengthen the APC IT systems for data exchange and digitalisation to further streamline the verification process.³¹ Finally, the authorities report that professional development continues for the employees of the APC's Sector for Control of Assets and Income (14 employees), with a particular focus on the area of digital assets, most of whom took part in recent training activities on verification of asset declarations and enhancing analytical capacities in this area.³²

³¹ In particular, in the framework of developing the APC's new Unified Information System, it is envisaged to enhance data exchange with other public authorities and entities maintaining records relevant to the APC's work. The UIS aims to integrate all APC processes into a single digital platform with a central electronic registry, improving the portal for asset declaration submission, unifying registers and databases, and developing advanced analytics and digital services.

³² More specifically, 12 employees of the APC took part in the "Training on the Verification of Asset Declarations of Public Officials" conducted on 23-24 April 2026 in the framework of the Council of Europe-implemented

71. GRECO notes that the APC pursues verification of asset and income declarations, in accordance with its annual plans, which have now been completed with respect to 96 assistant ministers, and the process is on-going. The continuous training provided to the APC staff to facilitate the performance of this task is also a positive sign. However, it would appear that the APC's focus of the verification of declarations has shifted from PTEFs to other categories of public officials, namely members of Parliament, the judiciary and the prosecution. While ensuring the integrity and preventing conflicts of interest among these officials is of paramount importance, no further steps are reported with regard to expanding verifications of asset and income declarations to broader categories of PTEFs. Finally, the APC's administrative entity in charge of verification of asset declarations still needs to be allocated sufficient human resources. It follows that this recommendation cannot be considered as implemented more than partly.

72. GRECO concludes that recommendation xiii remains partly implemented.

Recommendation xiv

73. *GRECO recommended that (i) the immunity provided to members of the government be revised in order to exclude explicitly corruption-related offences; (ii) the competence of the Prosecutor's Office for Organised Crime be extended to cover all persons with top executive functions, including the President, for criminal offences against an official duty and be staffed adequately to fulfil its role.*

74. GRECO recalls that this recommendation was not implemented in the Compliance Report. The constitutional provisions regarding the immunity of members of the Government, referred to by the authorities at the time, were already taken into consideration at the time of the evaluation, and no new measures were reported to revise their immunity to exclude corruption-related offences. Further, no measures were taken to extend the competence of the Prosecutor's Office for Organised Crime to cover all PTEFs, including the President, for corruption offences against official duty. Finally, GRECO observed that, although recruitment for prosecutors in the Prosecutor's Office for Organised Crime was underway, the staffing process had not been completed.

75. The authorities reiterate that the immunity of members of Government is regulated by the Constitution. They submit that any modification of the concept of immunity, including the exclusion of certain criminal offences from its scope, would require an amendment to the Constitution.

76. GRECO notes that no new information has been provided with regard to the first part of this recommendation. The long-standing position of GRECO on the subject of immunity in the context of criminal proceedings, and the underlying legal standards of the Council of Europe, the monitoring of which is *raison d'être* of GRECO, have been

project entitled "Suppressing Economic Crime in Serbia" with the funding of the Swedish International Development Cooperation Agency. Another training conducted by the UNODC aimed at enhancing the analytical capacities of the APC in the verification of asset and income declarations of public officials was attended by 14 employees of the APC.

comprehensively covered in the Compliance Report (paragraph 69).³³ GRECO regrets that the authorities do not demonstrate any intention to even consider revising the immunity of members of Government so that corruption-related offences are excluded from its scope.

77. With regard to the second part, the authorities provide no information. Therefore, GRECO notes that no steps have been taken, or considered, to extend the competence of the Prosecutor's Office for Organised Crime to cover all PTEFs, including the President. Moreover, subsequent to the submission of the Situation Report by the authorities (31 December 2025), numerous reports in the media came to GRECO's attention, informing that on 28 January 2026, Parliament adopted amendments to several laws governing the judiciary and the prosecution.³⁴ These amendments sparked concerns from the Prosecutor's Office for Organised Crime,³⁵ civil society,³⁶ as well as international organisations.³⁷
78. GRECO notes that the European Commission for Democracy through Law is expected to adopt an urgent opinion³⁸ on the entirety of the amendments in question. GRECO limits itself to assessing the possible impact of the January 2026 amendments on the implementation of this recommendation specifically. In this regard, GRECO is concerned over two specific issues. One is the fact that, as per Article 12 of the Final Provisions of the Law on Amendments and Supplements to the Law on Public Prosecution, prosecutors temporarily assigned to other prosecutors' offices are to terminate these assignments within 30 days from their entry into force. In effect, this means that 11 of the 20 prosecutors currently working in the Prosecutor's Office for Organised Crime will have terminated their service in this body. This development goes against the very objective of this recommendation, which is to strengthen the staffing of this Office.³⁹

³³ GRECO has previously issued recommendations to several member States regarding the standard stipulating that *immunities should be limited to the extent necessary in a democratic society so as not to hamper the investigation, prosecution or adjudication of corruption offences* (Twenty Guiding Principles for the Fight against Corruption). This rule should also apply to criminal investigations with regard to PTEFs, involved in corruption offences. In several previous reports, GRECO has recommended limiting the privileges enjoyed by PTEFs with respect to prosecution for acts performed outside their official capacity and has stressed the importance of objective and fair criteria for lifting immunities.

³⁴ The text of the amendments, as submitted to the European Commission for Democracy through Law, is accessible via the following link: <https://www.coe.int/en/web/venice-commission/-/opinion-1274>

³⁵ In a 19 January 2026 statement, the Collegium of the Public Prosecutor's Office for Organised Crime warned that the adoption of amendments would mean a complete blocking of proceedings in the cases of the most dangerous organised criminal groups and high levels of corruption. The corresponding news item is accessible via the following link (in English): <https://vreme.com/en/drustvo/jtok-vlast-hoce-da-blokira-istrage-organizovanog-kriminala-i-visoke-korupcije/> The original statement in Serbian is accessible via the following link: https://www.tok.it.rs/html_tok/saopstenja/saopstenje_20260119_lat.pdf

³⁶ Transparency Serbia expressed the view that "changes to judicial regulations will likely reduce the possibilities of the Prosecutor's Office for Organised Crime to investigate possible corruption of high-ranking public officials." Full statement is accessible

³⁷ According to the EU Enlargement Spokesperson Guillaume Mercier, the amendments "could represent a significant step backwards in Serbia's commitment to its path towards EU accession".

³⁸ In this context, the delegation of the Venice Commission visited Belgrade on 16-17 March 2026 <https://www.coe.int/en/web/venice-commission/-/serbia-visit-to-belgrade-for-the-forthcoming-urgent-opinion-on-the-28-january-2026-amendments-to-laws-governing-the-judiciary-and-the-prosecution>.

³⁹ Paragraph 109 of the Fifth Round Evaluation Report notes that "the staffing of the Prosecutor's Office for Organised Crime needs to be reinforced urgently."

The second concern of GRECO relates to the timing of the adoption of these amendments, which were preceded by the initiation of prosecutions into possible corruption offences involving two former and one current ministers.⁴⁰ Comments made on public television by the member of Parliament, who initiated the amendments, unambiguously mention that the new set of laws was adopted in order to prevent the arrest of ministers.⁴¹ GRECO considers that these developments, seen together, may damage the credibility of the authorities' resolve to combat corruption possibly involving senior government officials. Overall, GRECO takes the view that the amendments adopted in January of 2026 bear negative consequences on the functioning of the Prosecutor's Office for Organised Crime, as its staff appears to be sharply reduced as a result, and its competences are still not covering all PTEFs for offences against an official duty.

79. GRECO concludes that recommendation xiv remains not implemented.

Preventing corruption and promoting integrity in law enforcement agencies

Recommendation xv

80. *GRECO recommended that a strategic document on corruption prevention in the police identifying risk areas and setting clear goals be adopted and made public as soon as possible.*
81. It is recalled that this recommendation was not implemented in the Compliance Report. GRECO noted that, while the draft National Anti-Corruption Strategy and Action Plan included a chapter on the Ministry of the Interior, no dedicated strategic document on corruption prevention in the police had been adopted at the time. GRECO observed that, despite the authorities' references to the Integrity Plan of the Ministry of the Interior, in preparation since 2017, it was still unclear whether or when this document was finally adopted. The authorities were called upon to develop, adopt and implement strategic measures to prevent corruption in the police.
82. The Serbian authorities now report that a draft Operational Plan for the Prevention of Corruption in the Police has been prepared, in accordance with the draft 2026-2028 Action Plan for the implementation of the National Strategy, envisaged under Measure 4.3., entitled "*Improvement of anti-corruption mechanisms in the work of the Ministry of the Interior*". The authorities submit that the formal adoption of the Operational Plan with respect to the Police is imminent.

⁴⁰ See, in particular, media reports via the following links: <https://europeanwesternbalkans.com/2025/08/11/do-serbias-recent-high-level-corruption-arrests-mark-a-turning-point/> and <https://europeanwesternbalkans.com/2025/12/10/how-did-jared-kushners-company-project-pit-the-serbian-ruling-party-against-the-judiciary/>

⁴¹ See, in particular, the media report via the following link: <https://europeanwesternbalkans.com/2026/02/04/sns-mp-mrdic-admits-judicial-laws-were-passed-to-prevent-arrests/> as well as the full programme on K1 Television with the appearance of the member of Parliament concerned via the following link (statements as of 16:20 of the programme): https://youtu.be/uLlxB_h3JOE?si=EPZnLDPwe3inKF1l

83. GRECO welcomes the development of a draft Operational Plan for the Prevention of Corruption in the Police and urges the authorities to proceed with its adoption.

84. GRECO concludes that recommendation xv has been partly implemented.

Recommendation xvi

85. *GRECO recommended that (i) the Code of Police Ethics be updated so as to cover in detail all relevant integrity matters (such as conflict of interest, gifts, contacts with third parties, outside activities, confidential information), be supplemented with guidance illustrating all issues and risk areas with concrete examples and enforceable in case of breach, and (ii) that the code be made known and accessible to the public.*

86. GRECO recalls that this recommendation was considered partly implemented in the Compliance Report. GRECO welcomed the adoption and publication of the Code of Police Ethics, and the intention to issue a guiding document with examples illustrating the application of the Code in practice. However, the guidelines were not adopted at the time.

87. The authorities now report that, following the approval and publication on 6 October 2023 of the Code of Police Ethics, the Guidelines for the Implementation of the Code of Police Ethics are being finalised and will be published upon the approval by the Minister of the Interior. The authorities specify that both the Code and the Guidelines address, *inter alia*, issues related to the prevention of conflicts of interest, conduct outside official duty, handling of data, relations with citizens, the Police Ethics Commission, and other relevant matters.

88. GRECO welcomes the expected finalisation of the Guidelines for the Implementation of the Police Code of Ethics and encourages the authorities to proceed with their adoption.

89. GRECO concludes that recommendation xvi remains partly implemented.

Recommendation xvii

90. *GRECO recommended that (i) compulsory training for new recruits and serving police officers be organised on the basis of the revised Code of Police Ethics; (ii) efforts be made to clarify to police officers how to obtain advice on integrity matters and to ensure that the confidentiality of such advice is kept.*

91. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO welcomed the inclusion of the updated Code of Police Ethics in mandatory initial and in-service training for police employees and noted the significant number of police officers receiving training on integrity and ethics as a positive development. However, the intended setting up of the Commission for Police Ethics, which would be tasked with providing confidential advice and counselling, had not been completed at the time. Finally, more information was needed to ascertain that police staff were duly informed on the ways of seeking advice on integrity matters.

92. The authorities now report that, in the course of 2025, the mandatory professional development programme for police officers was attended by a total of 27,522 employees and included the topic of “*Ethics and Integrity*”. Further, within the same programme, training was also provided to a total of 23,427 police officers on the topic “*Law on the Protection of Whistleblowers*”. In addition, a seminar on the topic “*Strengthening Integrity*” was conducted in the same year and was attended by 744 police officers. Finally, the authorities submit that all police officers have been informed of the establishment, in March 2024, of the Police Ethics Commission, its composition,⁴² its role, and the available channels of communication with the Commission.
93. GRECO welcomes the continuous training of police staff on issues of integrity and whistleblower protection, which appears to reach a considerable number of employees, both newly recruited and already in service, through mandatory training programmes. GRECO notes with satisfaction that the Police Ethics Commission has been set up and its functions also include confidential advice on the implementation of the Code of Police Ethics. Finally, GRECO notes the authorities’ assertion that that steps have been taken to inform the police employees of ways to obtain such advice. In view of the above, GRECO considers that the requirements of this recommendation have been complied with.
94. GRECO concludes that recommendation xvii has been implemented satisfactorily.
- Recommendation xviii
95. *GRECO recommended that measures be taken to prevent political appointments of top police officials and that the procedure leading to the appointment of the Chief of Police, including in case of reappointment, and other senior management posts includes a more open and transparent competition.*
96. GRECO recalls that this recommendation was not implemented in the Compliance Report. The legal provisions governing the appointment of the Chief of Police and other senior managerial positions, referred to by the authorities, had already been taken into account at the time of the evaluation and no new measures were reported. A draft Law on Internal Affairs was reported to be in preparation and intended to introduce new rules for a more open and transparent appointment procedure. However, the draft had not been adopted at the time, and no other tangible measures were taken to strengthen merit-based selection for key police positions.

⁴² The Commission of Police Ethics was established in March 2024 and is responsible inter alia for monitoring the implementation of the Code of Police Ethics, submitting periodic reports and recommendations to the Minister of the Interior on improving its application, initiating amendments and additions to the Code and providing confidential counselling to police officers upon their request regarding the application of the Code. The Commission is composed the Deputy Head of Cabinet of Police Director (Chairperson of the Commission), employee in the Cabinet of Police Director (Deputy Chairperson), employee of the Ministry of the Interior (Secretary), and a further six members, including one from the Ministry of the Interior, two from the Criminal Police University, one from the Independent Police Union, one from the Serbian Police Union and one from the Police Union of Serbia.

97. The authorities again refer to Article 149 of the Law on Police and explain in detail the procedure for selecting and appointing the Chief of Police by the Government, upon the proposal of the Minister of the Interior, following a public competition. They indicate that the competition is announced in the Official Gazette and on websites of the National Employment Service and the Ministry of the Interior, as well as on the notice board of the relevant organisational unit. The authorities provide further details of the selection procedure, which involves assessment of professional competencies and skills, psychological requirements, medical examination, and interview, resulting in a ranking drawn up by a commission. Finally, according to the additional information submitted by the authorities, preparatory work on the draft Law on Internal Affairs is still ongoing, and the draft has been subject to public debate procedure from 3 to 24 April 2026. Some of the issues covered by GRECO recommendations are said to be addressed in this draft.
98. GRECO regrets that, in spite of the ongoing preparation of the draft law on internal affairs, which had already been reported at the previous compliance stage, no concrete developments have occurred. In this regard, GRECO wishes to reiterate its position expressed at the time of the evaluation, notably, that to avoid risks of politicisation of appointments in the police and of investigations, the integrity, due process and transparency of appointment procedures in key positions in the police should be strengthened in order to prevent political appointments and to remove any impression that appointments are not made strictly on merit and competence. It would appear that these issues have still not been addressed. Moreover, the European Commission document entitled “Serbia 2025 Report”,⁴³ states that *“the operational autonomy of the police from the Ministry of the Interior during the pre-investigation and investigation phases to be fully accountable only to the prosecutor is still not established either in law or in practice.”* The issue of the police autonomy from the Ministry of the Interior has also been observed by representatives of the APC.⁴⁴ In view of the above, this recommendation cannot be considered as implemented, even partly.
99. GRECO concludes that recommendation xviii remains not implemented.

Recommendation xix

100. *GRECO recommended that security checks relating to the integrity of police officers be carried out at regular intervals throughout their career.*
101. It is recalled that this recommendation was not implemented in the Compliance Report. GRECO noted the intention to incorporate regular security checks of police officers in the draft Law on Internal Affairs, and the objective to carry out security checks for all

⁴³ The text of this document, with the full title “Commission staff working document Serbia 2025 Report Accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2025 Communication on EU enlargement policy” is accessible via the following link: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025SC0755>

⁴⁴ According to the European Commission’s 2025 Rule of Law Report, Country Chapter on Serbia, the police still lacks sufficient operational autonomy from the Ministry of Interior. According to the same report, representatives of the APC cited the long-pending issue of police autonomy from the Ministry of the Interior, which undermines the authority of the prosecution.

police officers was planned to be included in the Anti-Corruption Action Plan for 2023-2024 but had not been completed at the time.

102. The authorities now report that the Internal Control Sector of the Police conducted security vetting for three shortlisted candidates in the context of public competition for the position of the Chief of Police. Further, the authorities submit that during its day-to-day operations, the Internal Control Sector carries out vetting of police officers through preventive and repressive activities.
103. GRECO notes that no new policy or practical measures have been taken to address this recommendation. It would appear that preparatory work continues on the previously reported draft law on internal affairs, which is expected to incorporate regular security checks of police officers. GRECO also notes that the introduction of an obligation to perform regular security checks for all police officers is among the actions envisaged under the draft 2026-2028 Action Plan for the Implementation of the National Strategy, with the target date of completion set at the 2nd quarter of 2026 (Activity 4.3.4). In this regard, GRECO refers to its observations expressed in the Fifth Round Evaluation Report,⁴⁵ which remain valid, and calls on the Serbian authorities to take the necessary steps to introduce, with no further delay, integrity checks for police officers at regular intervals throughout their career.
104. GRECO concludes that recommendation xix remains not implemented.

Recommendation xx

105. *GRECO recommended that an institutional system of rotation of police staff be put in place, which could be applied, as appropriate, in areas considered particularly exposed to corruption risks.*
106. It is recalled that this recommendation was not implemented in the Compliance Report. Some measures were envisaged to determine corruption prone areas in the police work, which should have become the basis of deployment/relocation decisions of police officers. However, these initiatives had not been completed, and no institutional system of rotation of police staff was put in place at the time.
107. The authorities now report that the draft 2026-2028 Action Plan for the implementation of the National Strategy includes carrying out continuous adjustments to daily work schedules in police positions, identified as being at high risk of corruption (Activity 4.3.8), with the target date of completion set at the 4th quarter of 2028. They indicate that this activity will also form part of the Operational Plan for the Prevention of Corruption in the Police (see paragraph 82 above), where it will be regulated in greater detail.

⁴⁵ In particular, paragraph 146 of the Fifth Round Evaluation Report emphasises that “*personal circumstances of police employees may change over time and, in some cases, make a person more vulnerable to possible corruption risks (financial problems arising, for example, as a result of a mortgage or consumer loan, divorce, the illness of a relative, the bankruptcy of a spouse, etc.). Therefore, regular vetting should become the rule as a tool for prevention. Furthermore, some sectors having already been identified as particularly risk prone, namely traffic police and border police and other being particularly sensitive areas such as corruption and organised crime, it would be all the more beneficial to ensure regular vetting for personnel working in these areas.*”

However, prior to the implementation of this activity, the authorities submit that in the first place, it would be necessary to identify areas particularly exposed to corruption risks across different lines of police work and to include the outcomes in the Risk Register, currently under preparation. Finally, the authorities point out other constraints limiting rotation possibilities for police officers, according to their job categories.⁴⁶

108. GRECO notes that many of the measures reported by the authorities have already been referred to during the previous compliance stage (e.g., setting up a Risk Register, corruption risk analyses in different police units and local police departments etc.), but have not materialised. The new objectives and actions, included in the draft 2026-2028 Action Plan for the implementation of the National Strategy, are going in the right direction, but their implementation remains to be confirmed in practice. For the time being, while some preparatory work is planned, the target delivery date of these objectives remains distant. Overall, GRECO considers that no sufficient progress has been demonstrated to view this recommendation as implemented, even partly.

109. GRECO concludes that recommendation xx remains not implemented.

Recommendation xxi

110. *GRECO recommended that secondary activities of police officers be duly recorded and that regular checks be undertaken thereafter.*

111. GRECO recalls that this recommendation was not implemented in the Compliance Report. GRECO noted that creating records of secondary activities of police officers and developing the procedure for granting permissions to engage in such activities were planned but had not been introduced at the time.

112. The Serbian authorities now report that establishing a central registry of secondary employment for police officers would first require amending the Law on Police and the Law on Records and Data Processing in the Field of Internal Affairs. The authorities indicate that the Ministry of the Interior has the technical capacity to maintain records of police officers' secondary employment and taking up such employment is already subject to approval of heads of relevant organisational police units. Finally, they point to the fact that the draft 2026-2028 Action Plan for the implementation of the National Strategy envisages establishing a registry of secondary employment of police officers (Activity 4.3.9), and that this objective will also be included in the forthcoming Operational Plan.

113. GRECO takes note of the information provided by the authorities, indicating that the implementation of this recommendation is contingent on amending the applicable legislation. However, no concrete steps appear to be taken to this end, and the preparation of the previously reported draft law on internal affairs has not been

⁴⁶ More specifically, the authorities indicate that it would not be possible for a general police officer to replace a border police officer, nor for a border police officer to replace a traffic police officer, as prospective employees for these different positions in the system of internal affairs undergo different forms of training from very early stages and their competences are not interchangeable.

finalised. GRECO further notes that the draft 2026-2028 Action Plan for the implementation of the National Strategy includes among its activities establishing records of secondary activities of police officers, but its target date of completion is the 4th quarter of 2028. Overall, no tangible results have been confirmed to consider this recommendation as implemented, even partly.

114. GRECO concludes that recommendation xxi remains not implemented.

Recommendation xxiii

115. *GRECO recommended that the safeguards applicable to the mechanisms for oversight of police misconduct be revised and to ensure that they provide for sufficiently independent investigations into police complaints and a sufficient level of transparency.*

116. GRECO recalls that this recommendation was not implemented in the Compliance Report, as it was intended to be addressed through the adoption of the draft Law on Internal Affairs, which had not been adopted at the time.

117. The authorities reiterate the regulations governing public complaints procedure within the Ministry of the Interior (Law on Police and the Rulebook on the Complaints Procedure) and specify that in cases where the allegations relating to the conduct of police officers indicate a possible criminal offence towards citizens, such cases are referred to the Internal Control Sector and the competent public prosecutor's office. In addition, allegations of torture, ill-treatment or inhuman or degrading treatment, are also referred to the Commission for the Implementation of Standards of Police Conduct in the Field of the Prevention of Torture. Other allegations of violations of citizens' rights and freedoms are processed through a regular complaints procedure, conducted in two instances,⁴⁷ as long as complaints are submitted within a 30-day time limit. The outcome of this complainant procedure can be appealed before a court.

118. According to the authorities, in 2024, a total of 1,722 complaints were received, a 17% increase compared to 2023, of which 1,531 complaints were resolved. In 127 cases the complaints procedures established shortcomings in the work of police officers, resulting in 95 proposals for disciplinary proceedings, while in the remaining cases police officers were issued warnings. At first instance, decisions were rendered in 1,261 complaints, of which 251 were dismissed due to the absence of procedural prerequisites, while in 744 cases the complainant agreed with the position of the superior. At second instance, 170 complaints were examined, of which 11 were found to be well-founded. In the so-called expedited procedure, applied when a complaint is submitted after the 30-day deadline, 461 complaints were examined, of which 38 were assessed as well-founded, resulting in 25 proposals for the initiation of disciplinary proceedings.

⁴⁷ At first instance, the merits of the allegations contained in the complaint are decided by the immediate superior of the police officer concerned, who, if the complaint is found to be well-founded, is the only authority empowered to submit an initiative for the initiation of disciplinary proceedings against the police officer. At second instance, the complaint is decided by a three-member commission, one of whom is a representative of the public.

119. Finally, the authorities submit that, according to the draft Operational Plan, a comparative legal analysis of police complaints procedures in the EU Member States and Western Balkan countries is planned to be conducted in the course of 2026.⁴⁸ The findings of this analysis will inform an assessment as to which model may be suitable for the Ministry of the Interior and will allow determining the regulations to be amended or adopted with a view to implementing a solution acceptable to the Ministry.
120. GRECO notes that the information submitted by the authorities describes the system of public complaints with regard to alleged police misconduct and violations, which was already taken into consideration at the time of the evaluation.⁴⁹ Therefore, the observation that the public complaints procedure is mostly driven by the police and the Ministry of the Interior and for this reason does not qualify as external oversight remains valid.⁵⁰ The planned comparative analysis of police complaints systems in other member States could pave the way towards improving this system, but the ultimate outcome will be assessed by GRECO in due time in light of the progress made vis-à-vis the concerns underlying this recommendation. For the time being, the process has not even started, and no other concrete steps have been taken by the authorities to allow considering this recommendation as implemented, even partly.
121. GRECO concludes that recommendation xxiii remains not implemented.
- Recommendation xxiv
122. *GRECO recommended that awareness of and training on whistleblower protection be strengthened in the police.*
123. GRECO recalls that this recommendation was partly implemented in the Compliance Report. GRECO welcomed the inclusion of the protection of whistleblowers among topics for mandatory training of police officers, as well as some initial figures on officers having been trained on the matter but requested additional details on its implementation.
124. The authorities now report that as part of mandatory training under the professional development programme for police officers for 2025, some 23,427 police officers (17,437 men and 5,890 women) attended trainings on the topic of “*Law on the Protection of Whistleblowers.*” A further training on this topic is planned for the end of 2026.
125. GRECO notes that training on the protection of whistleblowers continues to be delivered to a substantial number of police employees, which is to be welcomed. This

⁴⁸ The implementation of this project is set to be initiated in the course of 2026, in cooperation with the OSCE Mission to Serbia.

⁴⁹ See paragraphs 180 and 181 of the Fifth Round Evaluation Report on Serbia.

⁵⁰ In particular, in paragraph 183 GRECO took the view that “*in order to avoid a “police investigating the police” situation, stronger safeguards need to be put in place, notably to ensure that this phase is more transparent and independent from the chain of command.*” Further, according to the same paragraph, “*the complaints resolution commissions would need to be more autonomous as their composition, though mixed, is predominantly made of police representatives, and they are incorporated in the police headquarters and departments.*”

demonstrated the resolve of the authorities to enhance awareness about the protective measures available for those reporting misconduct in the Police. GRECO is satisfied that the continuous measures taken by the authorities adequately respond to the requirements of this recommendation.

126. GRECO concludes that recommendation xxiv has been implemented satisfactorily.

III. CONCLUSIONS

127. In the light of the foregoing, GRECO concludes that Serbia has satisfactorily implemented three of the twenty-four recommendations set out in the Fifth Round Evaluation Report. Of the outstanding 21 recommendations, 10 have been partly implemented and 11 have not been implemented.
128. More specifically, recommendations xvii, xxii and xxiv have been implemented satisfactorily, recommendations ii to vi, viii, x, xiii, xv and xvi have been partly implemented and recommendations i, vii, ix, xi, xii, xiv, xviii to xxi and xxiii have not been implemented.
129. With regard to persons entrusted with top executive functions (PTEFs), the adoption and publication of the National Anti-Corruption Strategy for 2024-2028 is an important development. While the National Strategy acknowledges the need for a dedicated strategic document on the prevention of corruption amongst PTEFs, such a document remains to be developed. As to the implementation of the recommendations *per se*, GRECO is concerned that no concrete results have been achieved since the previous compliance report. More specifically, chiefs of staff and advisers remain outside the scope of the LPC, and integrity checks are still not part of appointment process of prospective ministers, chiefs of staff and advisers. No code of conduct covering PTEFs has been adopted and nor is there a document on conduct for the President. Although cooperation continues between the Agency for the Prevention of Corruption and other relevant bodies, the cooperation between the Government and the Agency has not been formalised, and the Agency has still not been provided with adequate human resources. While the Agency proceeded with verifications of asset and income declarations of PTEFs in 2024, the focus of verifications envisaged for 2025 has shifted on declarations submitted by members of Parliament, judges and prosecutors. Requests for information to the Government or Office of the President that are not granted still cannot be appealed to the Commissioner for Information of Public Interest. In spite of recent amendments, leading to enhanced conduct of public debates on draft legislation emanating from government, the Government Rules of Procedure do not guarantee that all legislation be subject to public consultation and the exceptions allowing broad interpretation remain in place. A few more ministries now have functioning internal audit units, although not all ministries are equipped with such audits yet. Moreover, corruption offences have not been excluded from the immunity provided to members of Government, and the competences of the Prosecutor's Office for Organised Crime for offences against an official duty still do not cover all PTEFs, including the President. Finally, the amendments to the Law on the Prosecution, adopted in January 2026, risk

considerably undermining the efficient functioning of the Prosecutor's Office for Organised Crime, owing in particular to their adverse effects on its staffing.

130. GRECO notes that the successful implementation of several recommendations issued with respect of PTEFs hinges on the pending amendments to the LPC and the Law on Lobbying. GRECO regrets that the legislative process regarding these amendments has seen no meaningful progress in nearly three years.
131. With regard to the police, tangible results have been achieved, notably, through continuous training on issues of integrity and whistleblower protection, reaching a considerable number of police officers. The Code of Police Ethics is now fully integrated into both initial and in-service police training, and the adoption of its implementation guidelines is imminent. The setting up of the Police Ethics Commission, tasked with providing confidential advice on integrity, is also to be welcomed. Some key activities have been included in the draft 2026-2028 Action Plan for the implementation of the National Strategy, such as the introduction of regular security checks for all police officers, the setting up of a register of secondary employment, and an institutionalised system of staff rotation in high corruption risk areas. However, the implementation of these measures has not commenced yet. Further, the long-anticipated Operational Plan for the Prevention of Corruption in the Police, is yet to be formally adopted. Of particular importance is the reforming of recruitment and appointment procedures for senior police positions to guarantee merit-based and transparent procedures. This would also contribute to enhancing the operational autonomy of the Police from the Ministry of the Interior, which remains an issue. Furthermore, the public complaints and oversight mechanism of the Police has not been revised to enhance its independence and transparency. The Serbian authorities are therefore encouraged to take resolute legislative and practical steps, without delay, to close the remaining gaps.
132. In view of the above, GRECO concludes that Serbia is not in sufficient compliance with the recommendations contained in the Fifth Round Evaluation Report within the meaning of Rule 31 revised bis, paragraph 10 of the Rules of Procedure. GRECO therefore decides to apply Rule 32 revised, paragraph 2 (i) and asks the Head of delegation of Serbia to provide a report on the progress in implementing the outstanding recommendations (i.e. recommendations i-xvi, xviii-xxi, and xxiii) by 30 June 2027.
133. In addition, in accordance with Rule 32 revised, paragraph 2, sub-paragraph (ii.b) of the Rules of Procedure, GRECO invites the President of the Statutory Committee to send a letter – with a copy to the Head of delegation of Serbia – to the Permanent Representative of Serbia to the Council of Europe, drawing attention to the non-compliance with the relevant recommendations and the need to take determined action with a view to achieving tangible progress as soon as possible.
134. GRECO invites the authorities of Serbia 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.