GROUP OF STATES AGAINST CORRUPTION (GRECO)

Anti-corruption trends, challenges and good practices in Europe & the United States of America



Featured Article: Preventing corruption and ensuring integrity at the local level, for local communities

Danela Arsovska

Anti-corruption body of the Council of Europe

25th General Activity Report (2024)





24th General Activity Report (2024)

of the Council of Europe's Group of States against Corruption (GRECO)

Anti-corruption trends, challenges and good practices in Europe & the United States of America

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Featured article: Preventing corruption and ensuring integrity at the local level, for local communities Danela ARSOVKSA Spokesperson on Ethics and Prevention of Corruption, Congress of Local and Regional Authorities

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INTRODUCTION BY THE PRESIDENT OF GRECO

David MEYER, Head of International Engagement & Rule of Law, International, Rights and Constitutional Policy Directorate, Ministry of Justice (United Kingdom)

am honoured to present the Twenty-Fifth General Activity Report of the Council of Europe's Group of States against Corruption (GRECO) — my first as the body's newly elected President. My mandate began in 2025 and will run throughout GRECO's 6th Evaluation Round, launched on 19 March 2025, which focuses on a critical frontier: Preventing corruption and promoting integrity at the sub-national level.

This Activity Report provides an overview of key activities and trends observed in 2024, shaped by GRECO's in-depth monitoring across its member states. It highlights emerging findings and challenges, showcases notable good practices from across the membership and most importantly, tracks the progress made by countries in strengthening anti-corruption frameworks and implementing GRECO's recommendations. As we move forward, this report serves as both a reflection on past efforts and a roadmap for the future, reinforcing the principle that anti-corruption action must remain central to governance at every level.

The year 2024 marked a significant milestone, as we celebrated GRECO's twenty-five years of intensive work, coinciding with the 75th anniversary of the Council of Europe. This anniversary provided an opportunity to "unite around our values", commemorated in the presence of the Presidents of the European Court of Human Rights, the Consultative Council of European Judges, and the Venice Commission, along with keynote guests from the Parliamentary Assembly and the Congress of Local and Regional Authorities. This milestone reaf-firmed GRECO's pivotal role in promoting integrity and combating corruption, while also highlighting our strong institutional ties, synergies, and contributions to reinforcing the Council of Europe's core objectives of human rights, democracy, and the rule of law.

Corruption lies at the heart of many challenges facing democracies today, eroding public trust in institutions, distorting economic opportunities by fostering unfair advantages, and deepening social injustices and inequalities. It weakens democratic principles and the rule of law, undermining institutional integrity, transparency and accountability – foundational pillars of good governance.

The global fight against corruption stands at a critical juncture. While significant progress has been made in strengthening anti-corruption frameworks, persistent and evolving challenges remain. Over the past year, geopolitical shifts, economic instability, and rapid technological advancements have reshaped corruption risks and governance dynamics. Furthermore, elections in several member states have raised integrity concerns, including allegations of undue influence and foreign interference, emphasising the urgent need to safeguard democratic processes. On 9 December 2024, GRECO's President issued a statement on International Anti-Corruption Day calling on States to take determined action to protect democracy against corruption. I take this opportunity to reiterate that message.

Restoring trust at all levels of society – particularly in public institutions, political leadership, the judiciary and law enforcement – requires sustained anti-corruption efforts, robust independent oversight, and an unwavering commitment to transparency, accountability and the core democratic values that uphold justice and integrity - the very founding principles enshrined in GRECO's Statute. At a time when integrity and accountability are more essential than ever, GRECO remains steadfast in its mission to improve its members' ability to combat corruption and promote a culture of integrity.

I would like to pay tribute to Marin Mrčela, GRECO's outgoing President and Justice of the Supreme Court of Croatia, whose leadership and dedication during numerous years and successive rounds have been instrumental in shaping GRECO's success. Under his guidance, GRECO has cemented its reputation as a hallmark of excellence within the Council of Europe and a leading authority in the fight against corruption. His outstanding contributions were rightfully recognized with the Pro Merito Medal awarded to him last year by the Council of Europe at the conclusion of his mandate.

Having been actively involved in GRECO's work for several years, including as a Bureau member, I have witnessed firsthand the strength and impact of our mutual evaluation mechanism. This approach fosters strong engagement from member states and drives meaningful progress in the fight against corruption. GRECO's authoritative monitoring conclusions provide clear guidance, enabling countries to strengthen their anticorruption frameworks with precision and accountability.

The continued commitment of the national leadership in member states is crucial for the swift effective implementation of GRECO's recommendations. Addressing outstanding recommendations from the 4th and 5th evaluation rounds is especially critical, as highlighted in this report. I should nevertheless emphasize that our members demonstrate high engagement in both evaluation and compliance processes, not only through the execution of monitoring work but also through the active participation of highly professional national delegates. These elements function exceptionally well, reinforcing GRECO's role as a robust platform for continuous, peer-driven dialogue and exchange on best practices and strategies to prevent and combat corruption effectively.

In 2024, we finalized key preparations for our 6th Evaluation Round, dedicated to preventing corruption and promoting integrity at the sub-national level. The groundwork for the first evaluation visits in 2025 is already well underway, paving the way for impactful assessments and recommendations.

We are honoured to include in our report a feature article by Danela ARSOVSKA, Spokesperson on Ethics and Prevention of Corruption at the Congress of Local and Regional Authorities, emphasizing the crucial role of local and regional governments in preventing corruption and promoting integrity. GRECO's 6th Evaluation Round provides a groundbreaking opportunity to reinforce anti-corruption frameworks, enhance transparency, and restore public trust in democracy at the sub-national level, further setting the standard for effective anti-corruption efforts in local and regional governance.

GRECO is committed to strong international cooperation, recognizing that the fight against corruption knows no borders. We work closely with key global partners, including the United Nations (UNODC), the OECD, the G20 Anti-Corruption Working Group, and the Organization of American States (OAS). GRECO is an active participant in the OECD Working Group on Bribery in International Business Transactions and the Working Party of Senior Public Integrity Officials (SPIO). All of these organisations hold observer status with GRECO, and vice versa, fostering a mutual exchange of expertise and best practices. Our Secretariats engage regularly, ensuring alignment, coordination, and joint initiatives that strengthen the global anti-corruption framework. By working together, we amplify our impact and strengthen our shared commitment to integrity, accountability, and transparency worldwide.

This is equally crucial at the European level, particularly in light of the European Union's developments in anti-corruption standards, policies and priorities. GRECO remains committed to exploring avenues for the EU's participation as a full member, fostering closer collaboration in the fight against corruption.

In these uncertain times, vigilance is more crucial than ever—criminals and the corrupt will always seek to exploit weaknesses and vulnerabilities. We must stand firm, strengthen integrity, and close loopholes, leaving no room for impunity. Lasting anti-corruption reforms require more than just laws and institutions, they must be driven by ethical leaders who are truly committed to sustaining change. As we move forward, GRECO's collective efforts must remain a driving force in the fight against corruption.



KEY FINDINGS

G RECO's evaluation work continued at full pace in 2024. GRECO carried out three evaluation visits during the year and a high-level visit. It adopted eight evaluation reports, and 36 compliance reports, including two compliance reports incorporating the related follow-up to a Rule 34 report. The information set out below about GRECO's findings is based on the reports made public in 2024.

Joint 1st and 2nd Round

In 2024, GRECO adopted and published one compliance report concerning the joint 1st and 2nd Round dealing with independence, specialisation and means available to national bodies engaged in the prevention of and fight against corruption; extent and scope of immunities; proceeds of corruption; public administration and corruption; and legal persons and corruption.

GRECO acknowledged progress on most recommendations, highlighting positive steps such as the introduction of a universal system of declaration of assets for all public servants, including politically appointed officials, a dedicated anti-corruption prevention unit, improved specialized adjudication and investigation of corruption cases, enhanced financial controls, and a register of beneficial ownership. However, it also emphasized that stronger efforts are needed for full compliance. Fundamental reforms to strengthen the independence of the judiciary, prosecution, and law enforcement, remain essential. GRECO also stressed the need for independent research to identify systemic corruption risks and recommended a more systematic inclusion of independent civil society and media in developing and implementing anti-corruption policies.

3rd Round – Incriminations and Transparency of party funding

In 2024, GRECO adopted and published one compliance report concerning the 3rd Round dealing with incriminations and transparency of party funding.

GRECO's recommendations have driven significant reforms in political funding transparency at federal and cantonal level. At the federal level, progress has been made regarding transparency in party and campaign funding, including donations above a set threshold. However, gaps remain, such as the lack of expenditure disclosure, high reporting thresholds, and the lack of independent audits prior to reporting or for the transparency of funding from third parties, such as foundations. At the cantonal level, reforms led to seven cantons enforcing laws and regulations in this respect (compared to two in 2011), and four more developing similar legislation. These developments highlight GRECO's influence, demonstrating that its evaluation and compliance procedures, although aimed at the federal level, have also driven improvements in transparency at the cantonal level.

4th Round – Prevention of corruption in respect of members of parliament, judges and prosecutors

In 2024, GRECO adopted 19 compliance and *interim* compliance reports concerning the 4th Round dealing with the prevention of corruption in respect of members of parliament, judges, and prosecutors. In the same year, seventeen compliance or *interim* compliance reports were made public following authorisation by the member states' national authorities.

Overall, there has been notable progress in the implementation of GRECO's 4th Round recommenda-tions. Out of the 17 compliance reports made public in 2024, one showed a globally unsatisfactory level of compliance (6%), another resulted in an exit from the non-compliance procedure (6%) and additionally 13 cases (76%) led to the closure of the 4th Round compliance procedure. In 4 cases, GRECO asked for further information to be provided on the implementation of recommendations not fully implemented. However, it is concerning that in some of the non-compliant member states, the reform process took up to 9 years from the time of adoption of their respective evaluation reports. This prolonged timeline raises questions about the efficiency of the reform process in certain member states.

Some progress is observed with respect to the introduction or application of codes of conduct for members of parliament. In some member states, codes of conduct were adopted or streamlined, coupled with monitoring, advisory and enforcement provisions, and additional guidance and/or training. Regrettably, many still lack adequate mechanisms for monitoring compliance and sanctioning breaches. Also, there are still a number of member states which have not yet taken any action in this respect, despite GRECO's long-standing recommendations. Additional measures for effective implementation and enforcement are still lacking, including the establishment and application of sanctioning mechanisms for members of parliament.

Sustained progress is observed as regards actions taken to ensure transparency of the legislative process. Some members introduced an online public consultation mechanism for all categories of bills to ensure equal access for stakeholders, including civil society, while others updated their website, published committee meeting records and made plenary sessions accessible online. GRECO continued to recommend that members establish clearer rules for meaningful public consultation and reduce the use of emergency procedures in adopting laws.

Members need to enhance public access to asset declaration by members of parliament and improve monitoring mechanisms. Virtually all GRECO members now require their members of parliament to disclose their assets, with several countries strengthening their asset declaration frameworks. However, progress on public accessibility remains slow, as several states do not publish declarations online or ensure full transparency. GRECO highlighted that verification and enforcement systems remain weak, with some oversight bodies lacking resources or not yet operational. Additionally, GRECO reiterated that bans in principle of certain gifts, donations and other benefits should be introduced or clearly imposed. It also stressed the need to introduce strict sanctions for violations to enhance compliance and deter misconduct.

GRECO welcomed progress in lobbying regulations, including improvement to existing rules, and steps taken to develop or enhance registers of lobbyists. However, clear guidance and rules on MP-lobbyist interactions and third-party engagements are still needed. Transparency in lobbying activities remains weak, and rules on gifts, hospitality, and benefits require further improvement. On a positive note, GRECO observed that amendments to a lobbying register act have expanded its scope, including tracking revolving door cases involving former MPs. While measures to prevent conflicts of interest have been introduced, independent confidential counselling for MPs on integrity issues is still needed in several members.

Some progress is observed as a result of the introduction or refinement of regulations on lobbying. Member states continued to introduce legislation on lobbying through registration and reporting obligations on lobbyists. This is a positive development, which has however not yet materialised in all GRECO members. Given that lobbying is a growing and topical phenomenon, it is important that rules are in place to provide transparency in respect of lobbyists and the actions taken by them in order to safeguard the integrity of the public decision-making process. Furthermore, once rules are in place, it is critical that they are coupled with adequate mechanisms for effective implementation, compliance and review. It is also essential that the other side of the lobbying equation, i.e. members of parliament, are provided clear guidance on how to engage with lobbyists and the expected conduct.

GRECO also assessed how member states complied with its recommendations on preventing corruption of judges and prosecutors and on safeguarding the integrity, transparency, accountability and independence of the judiciary. While some ongoing reforms in member states signal positive momentum, GRECO remained concerned by the persistence of threats to judicial independence and weaknesses in the structures separating the three branches of powers.

Several important developments to prevent corruption in respect of judges and prosecutors have been observed across multiple member states. New codes of ethics or guidelines for judges and prosecutors were adopted or revised. Also, GRECO welcomed measures taken by several members requiring judges and prosecutors to file declarations of assets, income and financial interests, while also strengthening verification and oversight by an independent body. Similarly, in some countries it observed that rules on judges and prosecutors' disciplinary liability were revised to provide more procedural safeguards, public disclosure and transparency, or that bodies responsible for disciplining judges and prosecutors were strengthened, with detailed information and data being published on a regular basis.

Further action is required to safeguard the independence of judicial councils from legislative and/or executive powers. GRECO reiterated that appointments to judicial governing bodies must be made with due

regard to judicial independence, and welcomed progress in one country for strengthening its judicial council and improving judicial appointments and career decisions.

Political influence over judicial appointments and governance remains a major threat to judicial independence. Progress was noted in several countries where the executive's discretion in judicial appointments was reduced, new laws on the judiciary strengthened the independence of prosecutors and of their operations, and set out clear provisions regarding the liability of judges and prosecutors for judicial errors. That said, political control over judicial selection, career advancement, and decision-making continues to be a serious concern in several states, requiring urgent action in line with GRECO's recommendations. In one instance, GRECO identified the need for fundamental reforms to strengthen the independence of the judiciary and prosecution, from the overarching control by the highest political/executive power. The implementation of transparent and objective criteria for judges' and prosecutors' recruitment, promotion and performance evaluation as well as disciplinary measures have yet to be observed.

Selected good practice from the 4th Round

Appointment of legal and ethics advisors in Parliament - Andorra

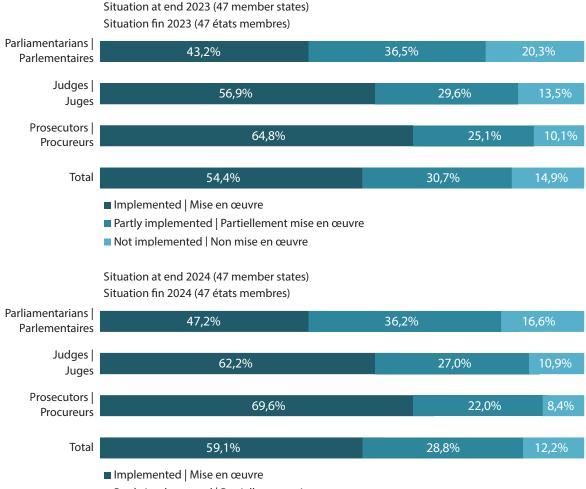
Parliament appointed two legal experts as advisors under the Code of Conduct for parliamentarians. They provide opinions on parliamentary matters, including on incompatibility rules, declarations of activities and assets, breaches of ethical rules and application of disciplinary sanctions. Additionally, they are expected to offer personal and confidential advice to parliamentarians on the application of the Code of Conduct.

Strengthening the integrity of judges – Republic of Moldova

Efforts have been made to strengthen the integrity of judges in the Republic of Moldova. Members of the self-governing bodies of judges and prosecutors have been subject to an external evaluation of ethical and financial integrity (vetting process). As a result, the Superior Council of Magistracy (SCM) and the Superior Council of Prosecutors (SCP) became operational. The vetting process is continuing in respect of candidates for the position of judge of the Supreme Court of Justice (five judges have been appointed after the successful completion of the vetting process) and candidates for the autonomous boards of the SCM and SCP. It will also extend to judges of the Chişinău Court of Appeal. Furthermore, candidates who join the National Institute of Justice to become judges or prosecutors, are required to file declarations of assets and interests which are subject to verification and in-depth control by the National Integrity Authority.

Figure 1 – Implementation of 4th Round recommendations by GRECO member states 2023-2024

Readers should bear in mind that the member states are at different stages of GRECO's procedure for the round and that the duration of a monitoring procedure varies - from the baseline evaluation report through the compliance procedure until the closing of the round in respect of each state. The statistics take account of all compliance reports made public by the end of 2023 or 2024, respectively.¹



Partly implemented | Partiellement mise en œuvre

Not implemented | Non mise en œuvre

^{1.} At end 2024, the following countries were in the non-compliance procedure under the 4th Round (application of Rule 32): Austria, Bosnia and Herzegovina, Denmark, Poland (inc. Rule 34 follow-up), Portugal and Türkiye.

5th Round – Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies

GRECO's 5th Evaluation Round deals with two categories: persons with top executive functions (PTEFs), and law enforcement agencies (LEAs). The two groups selected by GRECO are different in scope and powers, yet their ability to maintain and demonstrate integrity, as well as their capacity to cope with their internal corruption-related risks, are vital for the proper functioning of democracies based on the fundamental values of the rule of law and the protection of human rights.

In 2024, GRECO adopted 8 evaluation reports and 15 compliance reports concerning the 5th Round. In the same year, 23 reports (10 evaluation reports and 13 compliance reports) were made public following authorisation by the member states' national authorities.

The implementation of GRECO's recommendations concerning the 5th Round continues to remain insufficient. All 13 compliance reports made public in 2024 showed levels of compliance that were not sufficient, and the member states concerned were asked to provide updates on progress with the implementation of recommendations for further monitoring. While some positive trends were observed, particularly in relation to law enforcement agencies, significant steps have yet to be taken regarding PTEFs.

PERSONS WITH TOP EXECUTIVE FUNCTIONS (PTEFs)

Setting the proper tone should start with those in top executive functions who should lead by example when it comes to integrity. Irrespective of differences in the form of government and traditions, GRECO focused on the following major topics:

- Anticorruption and integrity policy, regulatory and institutional framework
- Transparency and oversight of executive activities of central government
- Conflicts of interest
- Prohibition or restriction of certain activities
- > Declaration of assets, income, liabilities and interests
- Accountability and enforcement mechanisms

Anticorruption and integrity policy, regulatory and institutional framework

Establishing clear rules and standards of conduct for PTEFs strengthens a country's commitment to anticorruption and helps counter the perception in some societies that top executive officials receive special treatment. GRECO has consistently recommended to include PTEFs in existing integrity policies, paying particular attention to the need for clear ethical standards for political advisors.

Several countries were recommended to take additional steps with respect to codes of conduct, to ensure that all integrity-related matters are comprehensively addressed and that they provide clearer guidance on key issues, notably conflicts of interest, post-employment restrictions, and enforcement mechanisms. It is positively noted that several countries adopted new codes of conduct or revised them, alongside efforts to provide guidance materials and confidential counselling. Many countries have taken steps to clarify the legal status and obligations of political advisors, but processes were often incomplete. Some codes of conduct did not uniformly cover all types of advisors, and some countries have yet to implement integrity policies specifically targeting political advisors.

Stronger supervision, proportionate sanctions, and independent oversight bodies are essential to ensure compliance with integrity rules for PTEFs. In most countries, enforcement and sanctioning mechanisms remain weak, with sanctions for non-compliance either inadequately developed or entirely absent.

Mechanisms are required to promote and raise awareness of integrity matters among PTEFs. Integrity training at regular intervals are crucial in order to raise awareness among PTEFs, together with establishing dedicated confidential counselling to provide them with advice on integrity, conflicts of interest and corruption prevention. Implementation is uneven. A few countries have established new training programmes, expanded their integrity training and awareness initiatives for PTEFs, with multiple countries leading the way in introducing digital learning initiatives or structured e-learning systems. most courses are voluntary, with no requirement for PTEFs to complete them before assuming office. Ensuring widespread participation, particularly among ministers and senior officials, continues to be a challenge.

Progress on establishing confidential counselling mechanisms for PTEFs remains limited. While some members have taken steps to establish confidential advisory mechanisms, gaps limit officials' ability to seek guidance on ethical matters. Many authorities rely on informal arrangements which do not guarantee full confidentiality. Some countries have initiated public consultations on ethics frameworks, including confidential counselling provisions, but these measures are still pending approval. In other cases, bodies responsible for ethics counselling also oversee compliance and enforcement, raising concerns about impartiality. On a positive note, several countries have initiated training programs that include integrity and ethical awareness, with a focus on confidential counselling mechanisms.

Transparency and oversight of executive activities of central government

A robust and balanced framework for managing PTEFs' interactions with lobbyists and third parties influencing public decision-making has yet to be put in place across many members. GRECO reports highlight persistent transparency and accountability issues, with lobbying interactions involving PTEFs often remaining partial or lacking mandatory disclosure. While some progress has been made, undisclosed influence over public decision-making remains a significant concern. Several countries have proposed new legislation or amendments, but many have yet to adopt or enforce these measures.

Some progress has been made in promoting transparency in the law-making process. Reforms were introduced to improve public consultations, including by updating websites and platforms for public engagement. Greater efforts are needed to ensure systematic and meaningful public participation, with adequate and consultation periods, and to ensure timely access to legislative processes. Only a few consultations actually resulted in published outcomes.

GRECO remained concerned that further action is needed to ensure that access to information laws are comprehensive, effectively enforced and proactively implemented. The lack of accessible information fosters public distrust in government institutions. GRECO continued to observe that access to information reforms remained incomplete in most GRECO member states. While some states have strengthened enforcement or were debating new legislation, others were recommended to set strict deadlines for responding to requests, to monitor refusals and delays to improve efficiency and to establish independent appeal mechanisms. GRECO also reminded countries of the Committee of Ministers Recommendation Rec(2002)2 on Access to Official Documents, which provides *inter alia* that limitations on the right of access to official documents must be necessary in a democratic society, proportionate, and only applied if there is not an overriding interest in disclosure.

Conflicts of interest

To prevent corruption, effective management of conflicts of interest is crucial. GRECO continued to recommend improving the handling of conflicts of interest, both regular and ad hoc, by clearly defining applicable rules and procedures. It suggested introducing ad hoc disclosure requirements for PTEFs (including political advisors) and stressed the importance of complementing them with advisory and monitoring mechanisms.

GRECO noted also that the state of play regarding risk analysis for persons entrusted with top executive functions (PTEFs) varies across countries, with many still lacking comprehensive and regular assessments. GRECO recommended the introduction of systematic risk assessments to identify integrity-related risks for PTEFs across numerous countries. However, progress has been slow, with many members only beginning to integrate risk assessments into anti-corruption policies or conducting them on an ad-hoc basis. Only few countries have taken steps towards establishing structured and regular systemic risk analyses for corruption risks among PTEFs.

Prohibition or restriction of certain activities

Several countries were recommended to revisit the legal framework in order to set clearer standards on the limits within which PTEFs can exercise additional activities or functions.

Some progress is observed in strengthening post-employment restrictions, with new legislation adopted strengthening enforcement and oversight, or extending cooling-off periods before PTEFs can accept employment in the private sector. Reforms were initiated in several countries, although final implementation is yet to be assessed. GRECO reiterated the importance of consistency in the application of the revolving door standards for all PTEFs and continued to recommend the need for stronger enforcement and effective monitoring mechanisms to prevent undue influence and address revolving door concerns. A six-month post-employment restriction was considered too short, with GRECO recommending two-year cooling-off periods as a more

effective safeguard. However, GRECO maintains that effectiveness in preventing conflicts of interest is more important than duration alone.

Declarations of assets, income, liabilities and interests

While GRECO acknowledged some progress, it continued to urge governments to enhance enforcement, improve accessibility, and ensure systematic and substantive reviews of PTEFs' declarations. Accessibility, independent and systematic monitoring as well as substantive oversight remain to be improved. Several countries evaluated were advised to consider expanding the scope of interest declarations to include information about spouses and dependent family members, on the understanding that this information might not necessarily be made public. Some countries have taken steps to strengthen financial disclosure systems, but many still lack adequate resources and institutional frameworks to ensure effective monitoring and enforcement.

Accountability and enforcement mechanisms

Enforcement of the codes of conduct should be ensured through effective supervision mechanisms, accompanied by appropriate sanctions. GRECO continues to observe that often there is no effective mechanism in place to monitor PTEFs' compliance with the integrity standards. GRECO also consistently called for sanctions to be adequate, effective, proportionate and dissuasive and for the development of additional controls. Only a few countries have taken steps to enforce compliance, though effectiveness is yet to be fully evaluated.

GRECO emphasized the need to strengthen the independence and capacity of investigative and prosecutorial bodies responsible for handling corruption cases involving PTEFs. It underscored the importance of ensuring these bodies are adequately resourced and benefit from specialized training to effectively carry out their mandate.

Immunity provided to members of the government should exclude corruption-related offences from such protection. While progress was noted in one country, in other cases, GRECO deplored the lack of any tangible results despite the passage of a considerable lapse of time since the adoption of the evaluation report. It also recalled 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.

LAW ENFORCEMENT AGENCIES (LEAs)

LEAs have the authority and powers to tackle crime. Given their authority to enforce the law, law enforcement officers should always be aware that they are bound by high standards of integrity. In respect of law enforcement, GRECO has focused on the following major topics:

- Anticorruption and integrity policy
- Recruitment, career, and conditions of service
- Conflicts of interest
- Prohibition or restriction of certain activities
- > Declaration of assets, income, liabilities, and interests
- Oversight and enforcement

Anti-corruption and integrity policy

Many countries are reinforcing their anti-corruption and integrity frameworks within law enforcement agencies. There is a growing emphasis placed on promoting a clear understanding that risk assessments play a crucial role in shaping anti-corruption policies and strategies within law enforcement agencies across various countries and the need for a comprehensive assessment of risks to identify corruption prone areas and emerging threats. GRECO also recommended regular training on risk management to be improved and continued for law enforcement officers. It is encouraging to see that several countries have made substantial progress, and several initiated or planned risk assessment initiatives. Once completed, these efforts will enable law enforcement to translate their findings into actionable corruption prevention strategies.

Several member states have made progress and adopted codes of conduct and mandatory training for the police, resulting in increased awareness of integrity-related matters. In countries with existing anti-corruption strategies and codes of conduct, GRECO continued advising supplementing these codes with additional

provisions covering gifts, ad hoc conflicts of interest, and interactions with third parties while emphasising the need for strong oversight and enforcement, sometimes with the introduction of sanctions for non-compliance.

There is a clear need for sustained measures to put in place independent, well-structured confidential counselling mechanisms coupled with regular integrity training in law enforcement. GRECO has monitored the implementation of confidential counselling mechanisms in law enforcement agencies to support officers facing ethical dilemmas and integrity concerns. Progress has been uneven, with some countries having established or planning counselling mechanisms on ethics and matters of professional conduct, while others have yet to act on recommendations, including by reviewing and reshaping existing mechanisms to ensure independence, trust and relevant expertise. GRECO underlined the importance of regular training on corruption prevention, integrity and conflicts of interests, conducted by qualified trainers, for all police staff, and notably for the senior management.

Recruitment, career and conditions of service

Law enforcement careers should be based on transparent, merit-based recruitment, promotion, and dismissal. While several countries have made strides in merit-based recruitment, integrity screening, and diversity initiatives, challenges persist in ensuring transparent, politically independent recruitment and promotion processes. Promotion remains a key concern, with issues such as unclear criteria, inconsistent or absent integrity checks, and discretionary, non-transparent selection processes which are not always governed by professional merit. One country has taken steps by incorporating integrity risks into police promotion criteria, but broader reforms are needed. GRECO continues to advocate for clear and transparent criteria, regular integrity checks, and improved oversight to enhance fairness and accountability in law enforcement recruitment and career advancement.

Gender equality in police remains a work in progress. While some member states have taken steps to increase women's representation and strengthen policies, challenges persist, particularly in career progression and leadership opportunities. GRECO has consistently emphasised the need for a more balanced representation of women at all levels, including senior management.

Organisation and accountability

Adequate resources and a fair remuneration are essential for maintaining a motivated, professional and corruption-resistant police force. GRECO continues to emphasize the importance of appropriate remuneration for police officers and when necessary, it has recommended increasing entry-level remuneration levels for law enforcement officers, while maintaining a progressive wage structure that incentivizes career advancement. Implementing GRECO's recommendations in this area will enhance policy integrity and operational effectiveness.

Operational independence is fundamental for effective and impartial law enforcement. While some progress has been made, such as assessing risks of undue influence and introducing legislative reforms, many countries continue to face challenges in ensuring political neutrality and preventing undue interference in law enforcement agencies. GRECO called whenever necessary for reforms to prevent political influence in police appointments and promotions. It underscored the need for transparent recruitment and appointments processes, independent oversight bodies and stronger integrity mechanisms to ensure that police forces operate with integrity and accountability.

Conflicts of interest

Addressing conflicts of interest through clear policies, training, and oversight mechanisms is essential for ensuring that law enforcement agencies operate with fairness, transparency, and accountability. GRECO asked many countries to update their codes of conduct to adequately address conflicts of interest and put in place safeguards against real, potential or perceived conflicts of interest. Several countries were planning to take further measures or testing new systems.

Prohibition or restriction of certain activities

Secondary employment (outside activities) by law enforcement officers presents significant integrity risks if not properly regulated and supervised and can lead to conflicts of interest, undue influence, and corruption. In several cases, GRECO has recommended the introduction of clear and enforceable rules governing secondary employment, the establishment of a transparent authorisation process, and the inclusion of specific provisions in codes of conduct. Additionally, effective oversight mechanisms should be implemented to monitor and limit integrity risks associated with outside activities.

Post-employment activities

Regarding post-employment activities, progress remains mixed with some countries taking steps to regulate post-employment activities, while others still lack clear policies. Many GRECO members have been recommended to conduct studies on post-employment practices, with the findings expected to guide future regulatory measures in this area.

Declaration of assets, income, liabilities and interests

Several improvements were identified in existing asset and interest declaration systems, particularly the need to enhance the effectiveness of declarations of assets and interests by holders of high-risk positions and to strengthen control mechanisms. Where necessary, GRECO recommended that asset declaration systems for senior police officers be supplemented with regular substantive checks and the imposition of appropriate sanctions for non-compliance or breaches of rules.

Notable progress has been made in policies, rules, and registers related to gifts and gratuities. Several countries have established centralised gift registers to record, evaluate and monitor gifts received by law enforcement officers. Many have further developed policies and reporting rules to define acceptable and unacceptable gifts, including permissible gift thresholds. In some cases, public access to information on donations and sponsorship has been enhanced, improving transparency. However, continued efforts are needed to ensure clarity, consistency in enforcement and adequate transparency in some countries. GRECO recommended countries to expand their ethical codes with practical guidance and case studies to clearly distinguish acceptable from prohibited gift-related behaviour. Several countries were recommended to review their systems for donations and sponsorship in order to put in place adequate safeguards against real, potential or perceived conflicts of interest and to ensure regular public disclosure of information on donations and sponsorship.

Oversight and enforcement

GRECO's assessment of internal control mechanisms in law enforcement agencies highlights progress in some areas but also significant gaps in ensuring effective oversight and accountability. Several countries were advised to implement stricter and more proactive internal oversight over law enforcement. Many internal control mechanisms, although operational, remain weak, lacking sufficient financial and human resources, autonomy and enforcement power.

While most countries have taken legislative and institutional measures to protect whistleblowers, including specialised training, serious implementation gaps persist. Key challenges remain in ensuring confidentiality, strengthening oversight, and increasing awareness among law enforcement officers about existing mechanisms. Notably, some countries have made positive strides by establishing or improving internal whistleblower reporting channels within police forces and border agencies. In countries where specific bodies or mechanisms are in place, GRECO has emphasised the need to raise awareness and strengthen these systems to enhance their use and effectiveness. A significant concern is that several countries still lack confidential reporting mechanisms, leaving whistleblowers vulnerable to retaliation. Additionally, many police officers remain unaware of whistleblower protections or distrust the system, resulting in low usage of reporting channels. For whistleblower protection to be fully effective, it is essential to foster trust in these mechanisms and ensure adequate safeguards against retaliation. Training and awareness raising continue to be critical gaps in most jurisdictions, while confidentiality and the independence of reporting channels require further improvement. To address these issues effectively, member states should align their efforts with the common principles set out in Recommendation CM/Rec(2014)7 of the Committee of Ministers to member States on the protection of whistleblowers.

GRECO highlighted the need for an independent system to investigate public complaints against the police, ensuring objectivity, effectiveness, and transparency. Some improvements were noted in respect of mechanisms introduced to record and monitor misconduct. However further efforts are required with respect to reporting requirements and procedures for handing them. GRECO underlined the necessity to ensure that complaints are effectively investigated, in a sufficiently transparent and independent manner. Measures taken in this respect should be reflected in centralised statistics and made available to the public, while respecting the anonymity of the persons concerned.

Transparency of party funding

The theme of transparency of party funding remains a critical issue, as it is essential for accountability and public trust in political life. GRECO's monitoring work has driven significant legislative and policy changes, helping member states build strong legal frameworks for political finance.

In 2024, GRECO continued to monitor progress and promote reforms in political financing and governance integrity whenever required. Several countries have introduced or strengthened lobbying regulations, enhancing transparency in political funding. Positive developments were also noted in public disclosure of financial data, including donations, expenditure and third-party contributions. Additionally, steps were taken to increase the independence and authority of regulatory bodies responsible for overseeing political financing, and to encourage broader public participation in drafting new political financing laws. GRECO has emphasized the need for greater transparency, particularly in the disclosure of donation sources, sponsorship and external contributions. It has also raised concerns about third-party funding and indirect financial contributions, calling for tighter regulations and stronger controls on anonymous and foreign donations to prevent undue political influence. Furthermore, GRECO has recommended stronger enforcement mechanisms, including proportionate and deterrent penalties for violations of political financing rules. Many recommendations remain partly implemented, prompting GRECO to call for continued legislative reforms to close loopholes and sustained monitoring to maintain progress in political finance transparency.

GRECO's participation in 2023 and 2024 events on political finance has highlighted emerging issues and challenges that are not fully addressed by the Committee of Ministers Recommendation Rec(2003)4 on Common Rules against Corruption in Political Funding. These developments suggest that the 2003 recommendation may require revision to better address current risks, regulatory gaps and evolving threats in party and electoral campaign financing, while reinforcing anti-corruption standards in electoral processes.

Gender diversity

Gender diversity is key in the prevention of groupthink and in turn of corruption. It is recalled that Recommendation Rec(2003)3 of the Committee of Ministers of the Council of Europe to members states on balanced participation of women and men in political and public decision making establishes that the representation of either women or men in any decision-making body in political or public life should not fall below 40%.

About a third of the questions contained in GRECO's 5th Round questionnaire are gender related. These include requests for statistics on gender representation in the branches of power under review (i.e. central governments and law enforcement) and for criminal/disciplinary statistics by gender. One of the aims is to identify gender imbalances which might potentially lead to, or result from, non-transparent informal networks and decision-making processes. As GRECO has sometimes pointed out in country reports, diversity has the potential of having positive effects on the overall working environment within an institution, making it more representative of the population as a whole.

The challenges lie in raising awareness of the gender dimension in male-dominated workforces such as the police. There is often a genuine lack of realisation that the gender dimension has been omitted and therefore raising awareness is key. During its 5th Evaluation Round, GRECO issued several gender-related recommendations, aimed at enhancing women's representation of women in police forces, notably in law enforcement leadership. It called for fair and transparent career promotion mechanisms to ensure gender balance in recruitment. GRECO encouraged member states to adopt merit-based processes while incorporating positive policies and practices that foster diversity in law enforcement. Additionally, GRECO underscored the need for work-life balance measures that support women's career progression and retention. Authorities were also advised to integrate gender considerations into integrity policies, anti-corruption training, counselling services, and whistleblower protections. Furthermore, GRECO stressed the importance of gender-disaggregated data collection in recruitment, promotions, and leadership to address gender imbalances in governance.

GRECO has also introduced a gender-focused dimension in its 6th Evaluation Round, integrating genderrelated questions and data collection into its assessment. Evaluations will examine, *inter alia* the situation regarding the gender balance in executive and representative bodies in sub-national authorities (including at the leadership level), as well as policies or regulations that promote balanced representation in decisionmaking. Additionally, the assessment includes gender aspects in integrity and ethics violations. This approach highlights the importance of diversity and fair representation in preventing corruption and strengthening democratic governance at the sub-national level.

Communication

Communication through traditional and social media is embedded in GRECO's work and allows information about GRECO's recommendations in every country to be widely disseminated and debated. GRECO's monitoring receives considerable media attention². Its reports are published with the consent of the country concerned and with few exceptions, all GRECO members adopt a practice of authorising publication shortly after their adoption. GRECO also issues a Newsletter regularly, and its website is widely consulted.

Selected good practice from the 5th Round

Corruption prevention in central government (including top executive functions)

Transparency in senior government appointments - Andorra

Appointments of all senior government officials, including names, functions, remuneration and CVs are publicly accessible on Andorra's Transparency Portal, enhancing accountability and public trust.

Transparency of the law-making process: Public consultation in anti-corruption policy making – Armenia

A multi-stakeholder working group was established (19 member bodies, including 11 NGOs) and contributed to the 2023-2026 Anti-Corruption Strategy through 10 sessions held over three months, both in full composition and within separate professional thematic groups. Moreover, on 23-24 August 2023, the public discussions around the Anti-Corruption Strategy, which were attended by approximately 80 representatives of sectoral non-governmental organisations, State bodies and donor organisations, enabled them to share their observations, highlight issues related to legal practice, and offer recommendations to enhance the Strategy. A Working Group has also been set up to monitor the Strategy's implementation, where civil society organisations (CSOs) are also permanent members. The role of the Working Group is to facilitate the discussion of anti-corruption reforms between State bodies and CSOs, serving as an effective cooperation platform between state bodies and civil society.

Code of conduct for members of the government and for public office holders – Belgium

A Code of conduct for members of the government was adopted by the Council of Ministers, which clarifies and completes the fundamental ethical principles and the rules of conduct for government members, lays down rules on integrity, accountability and transparency, defines and addresses conflicts of interest, limits and regulates the holding of multiple posts, governs the acceptance of gifts, sets out obligations that apply upon leaving office and lays down arrangements for supervision by the Prime Minister and the Federal Ethics Committee of compliance with the rules. In addition, the Code of conduct for public office holders has been extended to members of ministerial private offices, which helps to promote integrity among PTEFs.

Promotion of the integrity of PTEFs - Croatia

The 2021 Prevention of Conflicts of Interest Act requires public officeholders, including PTEFs, to disclose ad hoc conflicts of interest as they arise and to submit annual asset declarations. The Commission for the Resolution of Conflicts of Interest can request officials to furnish evidentiary documents in support of declarations of assets, failing which it will initiate proceedings for breaches of the applicable statutory provisions. In addition, the Commission has been vested with the power to request the competent authorities to submit any information or evidence without delay. Furthermore, the Law on the Government has been amended to remove the immunity enjoyed by members of the Government against the *ex officio* prosecution of corruption-related offences.

Publication of information about PTEF's advisers - Czechia

GRECO welcomed as a good practice the fact that the names, the remuneration (hourly rate and total amount paid over the reporting period) of PTEFs' advisers and the subject of the advice provided are published online by the Government and the ministries in an easily accessible manner.

Conflicts of interest for members of Government: self-assessment questionnaire - France

Upon taking office, government members receive a questionnaire from the High Authority for Transparency in Public Life (HATVP) which they must complete and return within seven days. The questionnaire is designed to

^{2.} See https://www.coe.int/en/web/greco/greco-in-the-media

help them identify any potential conflicts of interest that could interfere with the performance of their duties. It includes a reminder of what constitutes a conflict of interest and tips on how to prevent such situations from arising.

Increasing the capacity, authority and public accountability of State institutions entrusted with regulatory and control functions in relation to the management of public resources – Malta

Between 2015 to 2023, Malta significantly increased the budgets of main external and oversight bodies, such as the Office of the Ombudsman, National Audit Office, the Commissioner on Standards in Public Life and the Government's Internal Audit and Investigations Department (IAID), for instance by 20% (Ombudsman) and by 75% (IAID).

Introducing integrity checks as part of recruitment of some PTEFs - Montenegro

In December 2023, the Government of Montenegro introduced a mandatory check for the advisors to the Prime Minister, the Chief of the Cabinet of the Prime Minister, the Deputy Chief of the Cabinet of the Prime Minister, and the advisor to the Deputy Prime Minister as part of their employment procedure. This check is conducted through a request from the Secretary General of the Government to the Agency for the Prevention of Corruption to verify any proceedings against candidates to these positions for violations of the Law on Prevention of Corruption.

Publication of information on PTEFs' remuneration – Italy

Information on PTEFs' remuneration and benefits is published on the websites of the Presidency of the Council of Ministers and of the respective ministries, in a section called "Transparent Administration". This obligation stems from the principle of administrative transparency, as governed by Legislative Decree no. 33/2013, which foresees that public administrations have to publish the documents of appointment of the holders of political offices, even if not of an elective nature, at the state, regional and local level. They must also indicate the remuneration of any nature related to the assumption of office, the amounts pertaining to business travel and missions paid with public funds and any other appointments with charges borne by public finance, with an indication of the remuneration due.

Corruption prevention in law enforcement agencies

Recording and evaluating gifts – Serbia

A Commission for the Registration of Gifts, established in 2021 within the Ministry of the Interior, and whose members are appointed by the Minister for a period of three years, is responsible, in particular, for maintaining records of gifts received and their disposal. In January 2022, the Instruction of the Minister of the Interior lowered the threshold of admissible gifts to not more than 10% of the average monthly salary in Serbia, which is a very significant reduction from the previously existing permissible threshold.

Gender-inclusive health and well-being policies - Ireland

Efforts had been made to increase gender balance in the police force in Ireland notably with the introduction of a Remote Working Policy as well as a Menopause Guidance Document. The latter is intended to foster an inclusive work environment, by providing guidance and support to affected personnel and raising awareness about related challenges among their colleagues and supervisors.

Policy on gifts applicable in the Police – Lithuania

Lithuania established a policy on Gifts applicable in the Lithuanian Police and set up a Gifts Register and an Illegal Remuneration Register in the Police Department Management System. The policy sets out gifts valuation criteria, rules and thresholds on acceptable gifts, as well as their register, which is public and is updated regularly.

Publication of decisions in disciplinary proceedings involving law enforcement staff – Portugal

In 2022 the Ministry of Home Affairs' Inspectorate General for Home Affairs started publishing on its website decisions in disciplinary cases, which were investigated and dealt with by its staff members. This publicity included abstracts, reports and decisions, duly anonymised, rendered in 16 disciplinary cases between 2016 and 2022.

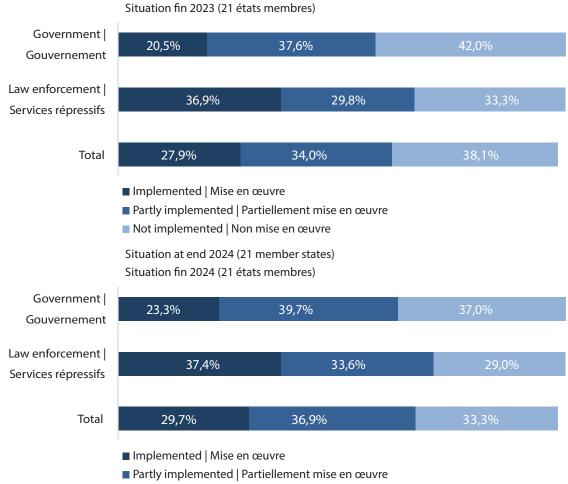
Comprehensive system for verifying the integrity of staff in law enforcement, as well as many PTEFs – Switzerland

The federal law introducing internal security measures has instituted personal security clearance (PSC), which also covers the integrity of individuals and corruption risks. PSC checks consist in the gathering of relevant security information on an individual's lifestyle, including close personal connections and family relations, their financial position, contacts abroad and any illegal activities threatening internal or external security. The checks verify in particular whether the individual is in debt or the subject of legal action to obtain payment of debt and whether there are any past or current criminal proceedings concerning them. There are two levels for checks: basic and enhanced, the latter of which may include an interview. PSC checks are carried out by a specialised service of the State Secretariat for Security Policy (SEPOS), attached to the Federal Department of Defence, Civil Protection and Sport (DDPS). PSC checks result in a statement of no risk, conditional security, risk or findings (if there is insufficient information for an assessment). The result is sent to the employer. The latter can choose to take responsibility for the risk, but in practice the PSC result is almost always accepted. It is also sent to the individual concerned and is open to challenge before the Federal Administrative Court.

Figure 2 – Implementation of 5th Round recommendations by GRECO member states 2023-2024

Readers should bear in mind that the member states are at different stages of GRECO's procedure for the round and that the duration of a monitoring procedure varies - from the baseline evaluation report through the compliance procedure until the closing of the round in respect of each state. The statistics take account of all compliance reports made public by the end of 2023 or 2024, respectively³.

Situation at end 2023 (21 member states)



Not implemented | Non mise en œuvre

^{3.} At end 2024, Belgium, Croatia, Denmark, Finland, France, Iceland, Malta, the Netherlands, North Macedonia, Poland, the Slovak Republic, Slovenia, Spain, Sweden and the United Kingdom were considered not in sufficient compliance with GRECO's 5th Round recommendations (application of Rule 32 revised).



FEATURED ARTICLE

Preventing corruption and ensuring integrity at the local level, for local communities

Danela ARSOVSKA, Spokesperson on Ethics and Prevention of Corruption of the Council of Europe's Congress of Local and Regional Authorities

n 2023, European leaders at the Council of Europe's Reykjavik Summit of Heads of State and Government stressed the importance of pursuing a relentless fight against corruption, including through prevention and by holding accountable those exercising public power. They had good reason for doing so. They understood that good, ethical governance is necessary to ensure that standards of human rights, democracy and the rule of law are applied in the interests of all Europeans. The challenge is to ensure action at every level of government – national, regional, and local – so that corruption has no dark corners in which to hide.

Local and regional governments are often the first point of official contact for the public - from processing planning permissions and ensuring waste management to putting in place local development strategies. This proximity places on them an immense responsibility to uphold the highest standards of conduct. It is here, at the coalface of public service, that corruption must be prevented and integrity promoted. As Mayor of Skopje, I can see for myself the pivotal role that subnational authorities can play, and fighting corruption and crime are among my top political priorities. Corruption undermines governance at all levels, but it is at the local level that its impact is most directly felt by people. It is also at this level that we must decisively implement anti-corruption policies, take action when identifying corruption, make the necessary changes to restore integrity, foster transparency and accountability, if we are to regain public trust in our democratic institutions.

Recognising this, the Congress of Local and Regional Authorities has long advocated – and acted - for robust ethical frameworks, tailored to the complexities and specificities of local governance.

Congress monitoring reports on the European Charter of Local Self-Government provide valuable insights into a range of issues that relate to tackling corruption: for example, on subnational governance systems, competencies, mechanisms and the responsibilities of various institutions, as well as conditions of service, recruitment and career policies, administrative supervision of local authorities' activities and appropriate financial compensation.

On this last point, the Congress has noted a negative trend in the failure of national authorities to ensure the conditions for free exercise of local elected mandates, notably when it comes to adequate and transparent financial compensation for local elected representatives. Providing this compensation is crucial for lowering corruption risks – and it is required by Article 7 of the Charter.

Where such problems are found, the reports point this out, and guide authorities to address them.

Separately, the European Urban Charter III, adopted in 2023 and containing principles for modern urban policies, includes a specific part on integrity and the prevention of corruption. This covers rules on ethics, conflicts of interest, public procurement and transparency and oversight.

This is important because ethics rules guide the appropriate behaviour of local and regional elected representatives and officials and send a strong signal to the public.

Similarly, the European Code of Conduct for all Persons Involved in Local and Regional Governance, adopted by the Congress in 2018, also promotes transparency, impartiality, and a merit-based approach, as well as the prevention of real and apparent conflicts of interest. The Code provides guidance on post-employment, public procurement and reporting wrongdoing. In addition, it highlights the need for effective implementation mechanisms, education and training.

The Congress has also adopted reports on specific corruption issues, aimed at helping local and regional authorities to tackle these more effectively. For example, there have been reports on providing guidance on transparency and open government, as well as on transparent public procurement and whistleblower

protection. These recognise the need for transparency and strong and innovative methods for citizen interaction and participation.

A report on conflicts of interest points the way to effective anti-corruption mechanisms that require proactive disclosure, prevention and resolution procedures, as well as putting in place monitoring, guidance and awareness raising for local politicians and officials. It states that there should also be clear rules on the acceptance of gifts and invitations, as well as declarations of interests, which can be easily consulted by the public.

Leading by example, in 2021, the Congress adopted a new Code of Conduct for its own members, which includes an obligation to declare conflicts of interest. Signing the Code of Conduct is a prerequisite for Congress members to exercise full membership rights. Its application has since been expanded to Congress youth delegates.

However, anti-corruption standards alone are not enough; we must educate, inspire and guide local and regional actors and the public at large to value integrity. This cultural approach is essential for the sustainability of our democratic institutions.

Across Europe, many local and regional authorities have pioneered innovative digital and artificial intelligence practices that enhance transparency and thereby strengthen accountability. For instance, digital platforms for public procurement have been introduced, allowing citizens to track government spending and tendering processes in real time. Such initiatives not only deter fraudulent activities but also promote a culture of openness and ultimately enhance trust.

Furthermore, the involvement of civil society and the national associations of local and regional authorities is essential for ensuring that anti-corruption initiatives are based on comprehensive knowledge, built on an inclusive approach and promote the sense of common responsibility among those involved.

A Congress Rule of Law Strategy is also being prepared in which the prevention of corruption will play a key role. This strategy will build on the synergies and activities that the Congress has developed - and will continue to develop - with institutional partners such as GRECO.

Certainly, GRECO is engaging with local and regional issues in new and important ways. The decision by GRECO to make this the focus of its 6th Evaluation Round, starting in 2025, is particularly welcome. For my part, I look forward to contributing as a first step to the training of GRECO evaluators. In turn, I know that the Congress can benefit from GRECO's expertise as it plans further training for local and regional elected representatives and their administrations.

GRECO's monitoring is a unique opportunity for local and regional authorities to look at themselves through the highest-resolution anti-corruption lens, see the imperfections, and take action. No international anticorruption body has offered this before. What is more, GRECO's 6th Evaluation Round also aims at showcasing good practice examples of anti-corruption mechanisms that have already been put in place in many of our members. A rich pool of knowledge could be built and put at the disposal of those seeking inspiration. Indeed, as a Spokesperson on Ethics and Prevention of Corruption, I trust that our members will seize this opportunity and cooperate to the greatest extent with GRECO for the ultimate betterment of our citizens' daily lives.

With so many challenges in the field of human rights, democracy and the rule of law, it is essential that we retain a laser focus on equipping authorities with the resources they need to implement comprehensive anticorruption strategies in a fast-changing, technology-driven world. By working together, the Congress and GRECO can help ensure a future for local and regional government that is underpinned by integrity and justice.

FRAMEWORK FOR GRECO'S ONGOING WORK

Council of Europe anti-corruption standards

The three unique treaties developed by the Council of Europe deal with corruption from the point of view of criminal, civil and administrative law. Corruption is seen not only as a threat to international business and financial interests, but to the values of democracy, human rights and the rule of law that are upheld by the Council of Europe. The Criminal Law Convention on Corruption (ETS No. 173) sets out common standards for corruption offences – among others, the establishment of criminal offences for active and passive bribery (as well as aiding and abetting in such offences) of domestic public officials, domestic public assemblies, foreign public officials, foreign public assemblies, members of international parliamentary assemblies and judges and officials of international courts; for active and passive bribery in the private sector and for trading in influence. Parties to the convention are required to provide for corporate liability, the protection of collaborators of justice and witnesses, and to establish in respect of the above-mentioned offences effective, proportionate and dissuasive sanctions. An Additional Protocol to ETS No. 173 (ETS No. 191) requires the establishment of criminal offences for active and passive bribery of domestic and foreign arbitrators and jurors.

The Civil Law Convention on Corruption (ETS No. 174) deals with compensation for damage, liability, contributory negligence, limitation periods, the validity of contracts, protection of employees, accounts and auditing, the acquisition of evidence, interim measures and international co-operation in relation to corruption defined as "requesting, offering, giving or accepting, directly or indirectly, a bribe or any other undue advantage or prospect thereof, which distorts the proper performance of any duty or behaviour required of the recipient of the bribe, the undue advantage or the prospect thereof".

Accession by any state to either the Criminal Law or Civil Law Convention on Corruption leads automatically to becoming a member of GRECO.⁴ On 20 October 2021, at the request of Morocco, the Committee of Ministers of the Council of Europe invited the country to accede to the Criminal and Civil Law Conventions on Corruption – pursuant to that invitation, which is valid for five years, the Council of Ministers of Morocco, chaired by the King, approved both conventions on 19 October 2023. Also at its own request, GRECO's most recent member, Kazakhstan, was invited by the Committee of Ministers of the Council of Europe to accede to the Criminal Law Convention on 30 June 2022 – the invitation is valid for five years.

The same evaluation criteria and level of detailed scrutiny by GRECO apply to states whether they have ratified these treaties or not. To date, two GRECO member states have not yet ratified the Criminal Law Convention on Corruption (ETS No. 173). Three members have not yet ratified the Additional Protocol to the Criminal Law on Corruption (ETS No. 191).

It is regrettable that at end 2024, 13 GRECO member states had still not ratified the Civil Law Convention on Corruption (ETS No. 174) despite its importance for the public, private (business) and not-for-profit sectors. The ratification process has not progressed substantially for some years and GRECO might decide in due course to revive that process e.g., through specific measures to promote the Convention. Likewise, while it is not a treaty that GRECO evaluates, it is regrettable that the number of parties to the Council of Europe Convention on the Manipulation of Sports Competitions (CETS No. 215) remains very low (13) even though corruption and integrity cases affecting sports events, and competition-related business more generally, are now frequently and prominently in the public eye.

Council of Europe Treaty Office: https://www.coe.int/en/web/conventions/home

The treaties are complemented by the following legal instruments:

- **Twenty Guiding Principles** for the fight against Corruption (Committee of Ministers Resolution (97) 24)
- Recommendation on Codes of Conduct for Public Officials (including a model code) (Committee of Ministers recommendation to member States No. R(2000) 10)

^{4.} The Russian Federation which became a member of GRECO by ratifying the Criminal Law Convention on Corruption (ETS No. 173) in 2006, denounced the convention in 2023 and ceased to be a member of GRECO on 1 July 2023. Belarus which became a member of GRECO by ratifying ETS No. 173 in 2007, denounced the convention in 2024 and ceased to be a member of GRECO on 1 May 2024.

Recommendation on Common Rules against Corruption in the Funding of Political Parties and Electoral Campaigns (Committee of Ministers recommendation to member States Rec(2003)4)

Furthermore, the Committee of Ministers has drawn GRECO's attention to anti-corruption components of other legal instruments and advisory texts that it can take into account in its work, for example:

- Convention on the Manipulation of Sports Competitions (CETS No. 215)
- Recommendation on the Protection of Whistleblowers (Committee of Ministers recommendation to member States CM/Rec(2014)7)
- Consultative Council of European Prosecutors Opinions: European Norms and Principles concerning Prosecutors (Rome Charter CCPE Opinion No.9), Independence, accountability and ethics of prosecutors (CCPE Opinion No. 13), The role of prosecutors in fighting corruption and related economic and financial crime (CCPE Opinion No. 14), Councils of Prosecutors as key bodies of prosecutorial independence (CCPE Opinion No. 18)
- Consultative Council of European Judges Opinions: The Position of the Judiciary and its Relations with other Powers of State in a Modern Democracy (CCJE Opinion No. 18), Preventing corruption among judges (CCJE Opinion No. 21), The evolution of the Councils for the Judiciary and their role in independent and impartial judicial systems (CCJE Opinion No. 24), Freedom of expression of judges (CCJE Opinion No. 25)
- Recommendation on the Legal Regulation of Lobbying Activities in the Context of Public Decisionmaking (Committee of Ministers recommendation to member States CM/Rec(2017)2)

Methodology – Evaluation

GRECO evaluation procedures involve the collection of information through questionnaire(s), on-site country visits enabling evaluation teams to solicit further information during high-level discussions with domestic key players and practitioners, and the drafting of evaluation reports. These reports provide an in-depth analysis of the situation in each country and are examined and adopted by GRECO during its plenary meetings. Evaluation reports state whether legislation and practice comply with the provisions under scrutiny and address recommendations to member states when action is required. The authorities are asked to report subsequently on the measures taken, which are then assessed by GRECO under a specific compliance procedure.

Methodology – Compliance

In the compliance procedure, GRECO monitors the implementation of the recommendations it has issued to the country in the evaluation report. The assessment of whether a recommendation has been implemented satisfactorily, partly or has not been implemented is based on a situation report, accompanied by supporting documents, submitted by the member under scrutiny. During the compliance procedure GRECO re-examines the concrete progress made in implementing the outstanding recommendations. Compliance reports adopted by GRECO also contain an overall conclusion on the implementation of all the recommendations, the purpose of which is to decide whether to close or continue the compliance procedure in respect of a particular member. For the 5th Evaluation Round, if at least two-thirds of the recommendations have been implemented satisfactorily or dealt with in a satisfactory manner, GRECO shall close the compliance procedure. The Rules of Procedure of GRECO foresee a procedure, based on a graduated approach, for dealing with members whose response to GRECO's recommendations has been found to be globally unsatisfactory (4th Round) or who have been found not to be in sufficient compliance with GRECO's recommendations (5th Round). These Rules also include a provision allowing GRECO to act on an ad hoc basis when an institutional reform, legislative initiative or procedural change by a member state might result in a serious violation by that member of a Council of Europe anti-corruption standard.

Evaluation Rounds⁵

GRECO's monitoring work is organised in rounds. Each has its own thematic scope and makes reference to a range of Council of Europe standard-setting texts of pertinence to the issues examined.

^{5.} See https://www.coe.int/en/web/greco/evaluations

6th Evaluation Round (launched in March 2025)

Preventing corruption and promoting integrity at the sub-national level

System of government at the national and sub-national level and competences of national authorities in promoting integrity and preventing corruption at the sub-national level

- > Constitutional and legislative framework, territorial structure and distribution of competencies
- > Applicability of national anti-corruption and integrity policies and/or strategies to sub-national authorities
- Implementation of national anti-corruption and integrity legislation by sub-national authorities
- Statistics on corruption offences at subnational level

Sub-national authorities

- Institutional framework
- Anti-corruption and integrity policies and risk assessment(s)
- Standards of conduct and ethics
- Conflicts of interest
- Incompatibilities, prohibition or restriction of certain activities
- > Declarations of assets, income, liabilities and interests
- > Transparency, access to information, public participation
- Control mechanisms, oversight and accountability
- > Disclosure of corruption and integrity violations, whistleblower protection
- Enforcement and sanctions

5th Evaluation Round (launched in March 2017)

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

Central government (top executive functions)

- System of government and top executive functions
- > Anticorruption and integrity policy, regulatory and institutional framework
- Transparency and oversight of executive activities of central government
- Conflicts of interest
- Prohibition or restriction of certain activities
- > Declaration of assets, income, liabilities and interests
- Accountability and enforcement mechanisms

Law enforcement agencies

- Organisation and accountability
- Anticorruption and integrity policy
- Recruitment, career and conditions of service
- Conflicts of interest
- Prohibition or restriction of certain activities
- Declaration of assets, income, liabilities and interests
- Oversight and enforcement

4th Evaluation Round (2012-2017)

Prevention of corruption in respect of members of parliament, judges and prosecutors

- Ethical principles and rules of conduct (all)
- Conflicts of interest (all)
- Recruitment, career and conditions of service (judges and prosecutors)

- > Transparency of the legislative process (members of parliament)
- Remuneration and economic benefits (members of parliament)
- > Prohibition or restriction of certain activities (all)
- > Declaration of assets, income, liabilities and interests (all)
- Supervision and enforcement of rules and regulations (all)
- Advice, training and awareness (all)

3rd Evaluation Round (2007-2012)

Theme I: Incriminations

- Essential concepts to be captured in the definition of passive and active bribery offences as well as trading in influence
- Limitation periods
- Jurisdiction
- Special defences

Theme II: Political funding

- > Transparency of books and accounts of political parties and election campaigns
- Monitoring of party and campaign funding
- Enforcement of the relevant funding rules

2nd Evaluation Round (2003-2006)

- Identification, seizure and confiscation of corruption proceeds
- Public administration and corruption (auditing systems, conflicts of interest, reporting of corruption and whistle-blower protection)
- Prevention of legal persons being used as shields for corruption
- > Fiscal and financial legislation to counter corruption
- Links between corruption, organised crime and money laundering

1st Evaluation Round (2000-2003)

- Independence, specialisation and means available to national bodies engaged in the prevention and fight against corruption
- Extent and scope of immunities from criminal liability.

Members that join GRECO after the close of an evaluation round undergo evaluations on the themes of previous rounds before joining the current one, starting with the first two rounds which are restructured into *Joint 1st and 2nd Round Evaluations*.

In March 2024, at its 96th Plenary Meeting, GRECO adopted the evaluation questionnaire for its 6th Evaluation Round on *Preventing corruption and promoting integrity at the sub-national level*, as well as related framework decisions for this new evaluation round that will be launched in 2025 (cf. section 6th Evaluation Round - Parameters).

Publication of reports

The long-standing practice whereby GRECO member states lift the confidentiality of reports shortly after their adoption and translate them into the national languages is extremely important. Raising awareness of GRECO's findings across society in this way prompts national debate and support for the implementation of its recommendations. The release of a report for publication is co-ordinated with the member state concerned and the Directorate of Communication of the Council of Europe to maximise media attention; this helps raise awareness in society and the institutions concerned about the expected reforms, which can in turn contribute to increasing support for their adoption and implementation.

5TH EVALUATION ROUND – PARAMETERS

he ongoing 5th Evaluation Round that is devoted to *Corruption prevention and promoting integrity in central governments (top executive functions) and law enforcement agencies* constitutes a logical extension to the 4th Round with its implications for shaping the public's attitudes vis-à-vis their political institutions and democracy in general. Furthermore, while law enforcement authorities form a cornerstone of the fight against corruption, and their integrity is therefore fundamental, experience shows that the specific risk factors involved in the work of law enforcement agencies warrant careful attention.

For the purpose of the 5th Evaluation Round, the term "central government" includes persons who are entrusted with top executive functions at national level (PTEFs). Bearing in mind each country's constitutional set-up,⁶ these functions might include those of heads of state, heads of central government, members of central government (e.g., ministers), as well as other political appointees who exercise top executive functions, such as deputy ministers, state secretaries, heads/members of a minister's private office (*cabinet ministériel*) and senior political officials. This might include political advisors, depending on the system of the country. Where political advisors are not evaluated in their own right, information about their interactions with PTEFs is nevertheless examined. Prior to the evaluation, the member state concerned is requested to submit a comprehensive and precise list of the "top executive functions" exercised by the head of state and by the head of the central government.

As regards Heads of State, GRECO decided (78th Plenary Meeting, December 2017) on the following definition for the 5th Round: "A Head of State would be covered by the 5th Evaluation Round under "central governments (top executive functions)" when s/he actively participates on a regular basis in the development and/or the execution of governmental functions, or advises the government on such functions. These may include determining and implementing policies, enforcing laws, proposing and/or implementing legislation, adopting and implementing by-laws/normative decrees, taking decisions on government expenditure, taking decisions on the appointment of individuals to top executive functions."

Concerning law enforcement agencies, in the interests of providing a streamlined, in-depth assessment, GRECO's evaluation focuses on officials of selected bodies performing core law enforcement functions which are subject to national laws and regulations, that is police services at national level which may include agencies responsible for border control.⁷ If a country has multiple police services at national level, the evaluation is limited to two or three main services. GRECO determines prior to the evaluation, on the basis of a reasoned proposal by the member state concerned, which services are to be evaluated.

In terms of the methodology and structure of evaluation reports, GRECO adopts a similar approach to that developed in the 4th Round. The questionnaire, which provides the main grid for evaluation, is divided into two parts: part (A) dealing with central governments (top executive functions) and part (B) dealing with selected law enforcement agencies. The first section of each part serves the purpose of generating fundamental input for obtaining an overall understanding of the system in each country.

Emphasis is put on the effective implementation of existing regulations. It is clear that effective corruption prevention relies to a large extent on the realisation of tangible achievements, and it is therefore crucial for GRECO evaluation teams to receive a maximum of information on practical and organisational arrangements, specific examples and statistics on the application of the law, and training, awareness-raising and other initiatives.

^{6.} In this context, the term "constitutional set-up" is to be understood as meaning a country's constitution, practice and specificities.

^{7.} Administrative customs services and tax authorities are excluded from this evaluation.

6TH EVALUATION ROUND – PARAMETERS

n June 2023, GRECO decided to devote its 6th Evaluation Round, which will be launched in 2025, to Preventing corruption and promoting integrity at the sub-national level. Directing its attention to local and regional authorities constitutes a logical extension to the 2nd, 4th and 5th Evaluation Rounds which covered essential components of central power. Sub-national authorities are responsible for a variety of public services and are an important part of national democracies. Their decisions affect citizens' lives in direct and immediate ways and by virtue of this proximity, they are at least as susceptible to corruption as the central public administration and Government.

GRECO's Working Party established in June 2023 to define the scope and focus of the 6th Evaluation Round, completed its work after two meetings, held in October 2023 and February 2024. In December 2023, the Plenary endorsed the Working Party's proposals regarding the level of sub-national authorities to be evaluated, relevant officials and topics, the evaluation and compliance methodology, as well as relevant standards and texts of reference. In March 2024, the Plenary took the final decisions on the evaluation parameters, modalities and questionnaire for the new 6th Evaluation Round.⁸

The 6th Evaluation Round focuses on sub-national authorities with competence, amongst others, to adopt legislation or regulations; authorise expenditure; take decisions over urban planning, development, and procurement; levy taxes; decide which services are provided and to whom; make decisions on recruitment and remuneration, etc. Bearing in mind each member State's constitutional set-up, the evaluation will cover executive and representative bodies, including elected or politically appointed officeholders who take significant decisions, mainly of executive nature, on behalf of the sub-national authority under evaluation. The evaluation will also cover public officials employed by the evaluated sub-national authorities who are responsible for authorising expenditure, making decisions on urban planning, development and procurement; determining service provision and overseeing recruitment and remuneration.

GRECO's questionnaire⁹ is divided into two parts: part A (completed by national authorities) examines the competences, mechanisms and responsibilities related to integrity promotion and corruption prevention at the sub-national level and other contextual factors, part B (completed by the two sub-national authorities) provides an in-depth focus on laws, regulations, procedures, bodies and mechanisms addressing integrity and corruption prevention in the two selected sub-national authorities.

Prior to the evaluation, the GRECO Secretariat, in consultation with the member state concerned, will identify two sub-national authorities, including (i) a capital or, in the absence of agreement, an alternative major city; (ii) a regional or other sub-national authority or, particularly in countries having only one sub-national tier, a municipality (size to be determined). The evaluation includes a five-day on-site visit and interviews with all relevant State (public) stakeholders, as well as relevant non-State actors, including civil society and media.

The evaluation will place strong emphasis on the effective implementation of existing regulations, recognising that successful corruption prevention depends on tangible achievements. Therefore, GRECO evaluation teams require comprehensive information on practical and organisational arrangements, including specific examples and statistics on the application of the law, training programs, awareness-raising efforts and other initiatives to assess real-world impact. The evaluation process will strive to accommodate the constitutional framework of all member States and reflect countries with different systems of government and different relationships between national and sub-national levels by addressing recommendations to the appropriate authorities.

^{8.} See Greco(2024)6 - Sixth Evaluation Round : National delegations, evaluators and on-site visits

^{9.} See Greco(2024)7- Questionnaire

GOVERNING STRUCTURES AND MANAGEMENT

he permanent bodies constituting GRECO are the Plenary, the Bureau and the Statutory Committee. The Statute also provides for ad hoc bodies, principally evaluation teams but also working parties.

Plenary and Bureau

GRECO elects a President, Vice-President and Bureau for each new evaluation round. The positions of President and Vice-President for the 5th Evaluation Round were taken up respectively in January 2017, by Marin MRČELA, Justice of the Supreme Court of Croatia and, in December 2019, by Monika OLSSON, Director of the Division for Criminal Law of the Ministry of Justice of Sweden. In 2024, the Bureau was composed of the President, Vice-President, and Panagiota VATIKALOU, Presiding Judge, Head of the First Instance Court of Chania (Greece); António DELICADO, Ministry of Justice (Portugal); Vita HABJAN BARBORIČ, Commission for the Prevention of Corruption (Slovenia); Olivier GONIN, Federal Office of Justice (Switzerland) and David MEYER, Ministry of Justice (United Kingdom).

The representatives of member states that compose the Plenary are directly involved in the peer review process during the examination and adoption of evaluation and compliance reports. The Plenary also takes final decisions on the focus of GRECO's monitoring, policy and planning.

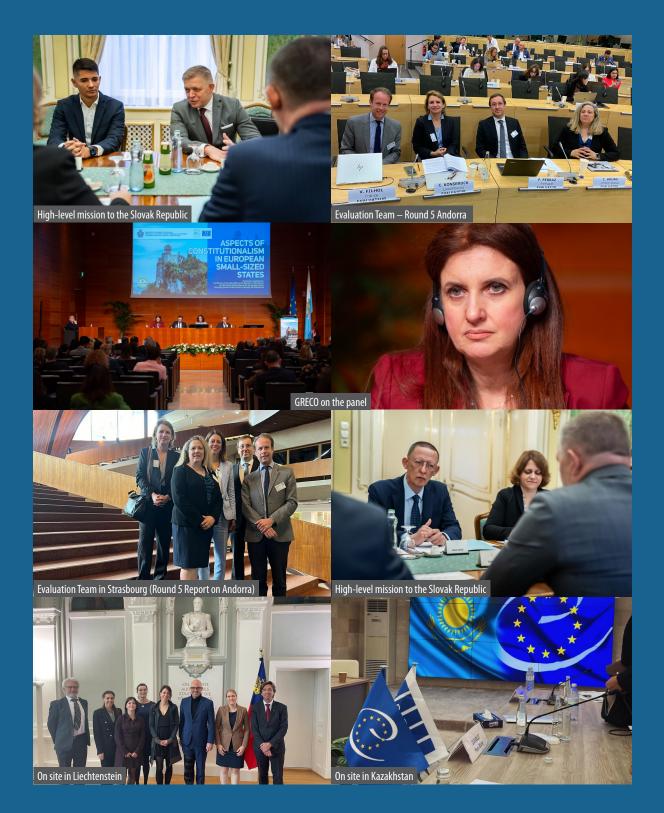
Elections for the 6th Evaluation Round were held in November 2024. The positions of President and Vice-President for that new Round will be taken up in January 2025 respectively by David MEYER (United Kingdom) and António DELICADO (Portugal). The new Bureau will be composed of the President, Vice-President and Alexia KALISPERA (Cyprus), Lise CHIPAULT (France), Panagiota VATIKALOU (Greece), Sorin TĂNASE (Romania) and Olivier GONIN (Switzerland).

Statutory Committee - Budget and Programme of Activities

The Statutory Committee is composed of the Permanent Representatives of the member states of the Council of Europe (the Ministers' Deputies) and representatives of the GRECO member states that are not members of the Organisation (in 2024: Kazakhstan and the United States of America). Its principal task is to adopt GRECO's programme and budget which is prepared in line with the approach implemented throughout the Council of Europe and based on priorities presented by the Secretary General and on GRECO's annual programme of activities. In 2024, the Statutory Committee, presided by Sandy MOSS, Ambassador Extraordinary and Plenipotentiary, Permanent Representative of the United Kingdom to the Council of Europe, approved adjustments to GRECO's Programme for 2024-2027 and its Budget for 2025. The Statutory Committee also considered a proposal by the GRECO Plenary to amend Article 15 of GRECO's Statute with regard to the publication of GRECO's reports, and decided to not amend the Statute at that point of time and to continue discussions on this point.

Secretariat

The Secretariat headed by Livia STOICA BECHT, Executive Secretary since 1 December 2023, provides support, guidance and technical and legal advice to the countries participating in GRECO's monitoring work and is responsible for the management of the budget and programme of activities, as well as external relations (cf. Appendix 5).



APPENDICES

Appendix 1 – GRECO's Mission

he anti-corruption monitoring body of the Council of Europe has been operational since 1999. It was established as the result of the strong political will of Council of Europe member states to take decisive and enduring measures to counter corruption by ensuring adherence to, and effective implementation of, the Organisation's anti-corruption standards. The mission of its membership, which extends beyond the geographical span of the Council of Europe, is to promote targeted anti-corruption action, awareness of corruption risks and careful consideration and implementation of reforms to remedy shortcomings in national policies, legislation and institutional set-ups.

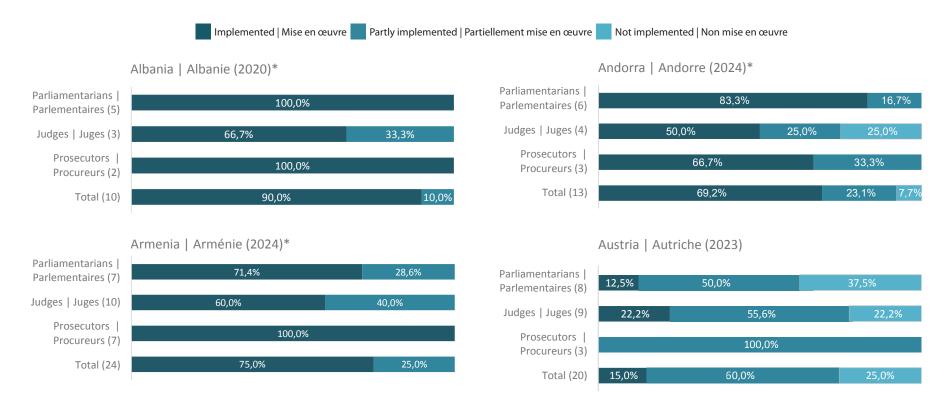
The clear stated political objective of strengthening the capacity of member states to prevent and fight corruption is served by a monitoring model designed to provide each member state with a detailed analysis and set of recommendations that are tailored to the specificities of each country. Subsequent "compliance procedures" serve to verify achievements and actively push for alignment with what has been recommended. Multiple layers of result validation and a high level of process ownership are some of the important features of this model. The dynamics of mutual evaluation and peer pressure continue to be pivotal to GRECO's work.

Appendix 2 – Implementation Statistics

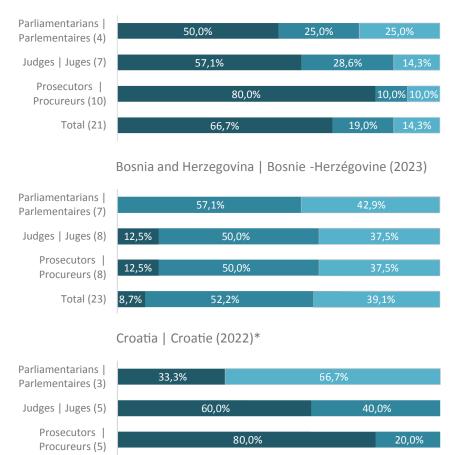
The tables presented here offer a visual representation of the state of implementation of GRECO's recommendations in respect of its member states individually. The statistics are not intended to be the basis of any ranking or direct comparison between countries when it comes to compliance with GRECO's recommendations or successful action against corruption. The aim is to provide a snapshot of progress made within GRECO's procedures vis-à-vis each member state. Readers should bear in mind that the member states are at different stages of GRECO's procedure for the respective evaluation rounds and that the duration of a monitoring procedure varies – from the baseline evaluation report through the compliance procedure until the closing of the round in respect of a particular state. The statistics take account of all compliance reports made public by end 2024 and the closing of a round is marked by an *.

The year indicated is when the most recent published compliance report was adopted. The figures in brackets correspond to the number of recommendations made in respect of each category.

4th Evaluation Round – Prevention of corruption in respect of members of parliament, judges and prosecutors



Azerbaijan | Azerbaïdjan (2020)*

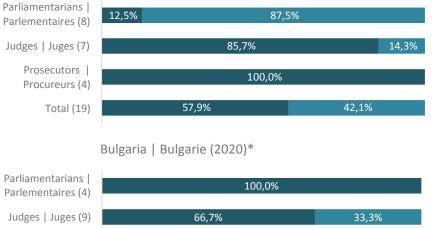


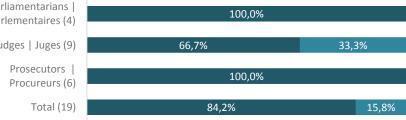
61.5%

23,1%

Total (13)

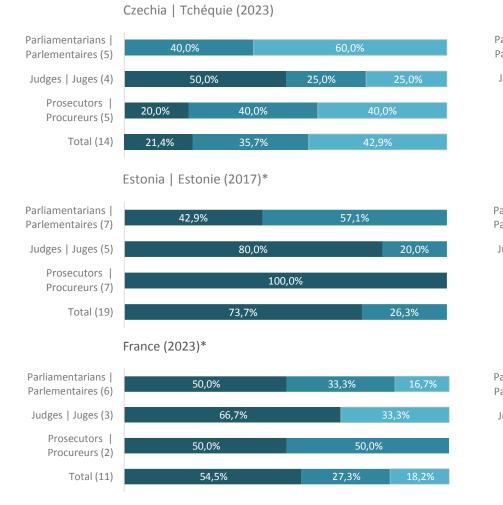
Belgium | Belgique (2024)



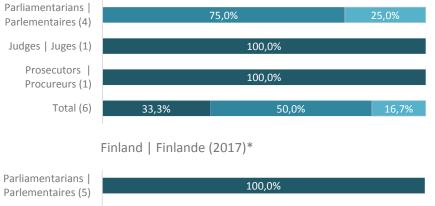


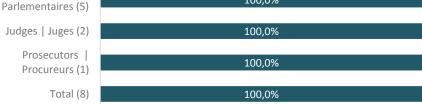
Cyprus | Chypre (2023)*





Denmark | Danemark (2023)

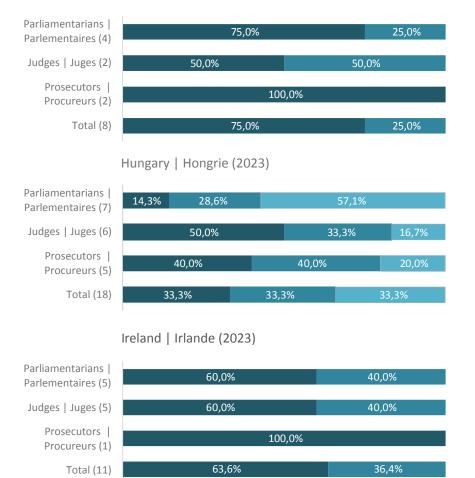




Georgia | Géorgie (2024)*

Parliamentarians Parlementaires (4)	25,0%		75	5,0%		
Judges Juges (7)	42,9%		42,9%			14,3%
Prosecutors Procureurs (7)			100,0%			
Total (18)	f	51,1%		33,	3%	5 <mark>,6%</mark>

Germany | Allemagne (2024)*



Greece | Grèce (2023)*



Iceland | Islande (2021)*



Italy | Italie (2024)*



Latvia | Lettonie (2020)*



Lithuania | Lituanie (2021)*



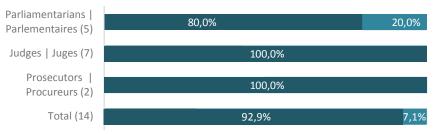
Malta | Malte (2022)*



Liechtenstein (2023)



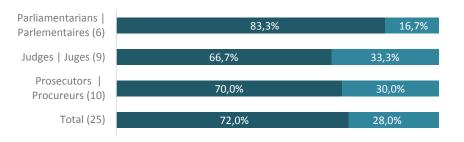
Luxembourg (2023)*



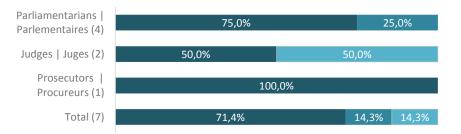
Republic of Moldova | République de Moldova (2024)*



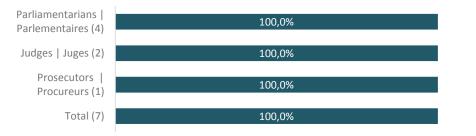
Monaco (2023)*



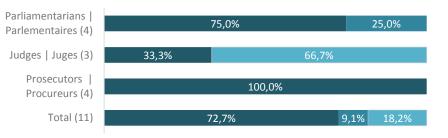
Netherlands | Pays -Bas (2021)*



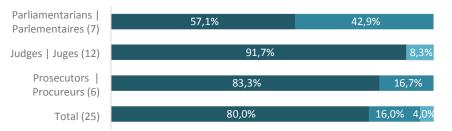
Norway | Norvège (2019)*



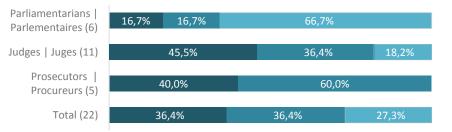
Montenegro | Monténégro (2019)*



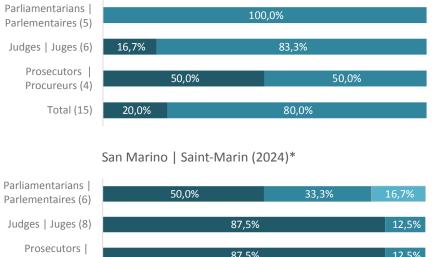
North Macedonia | Macédoine du Nord (2023)*



Poland | Pologne (2023)



Portugal (2023)





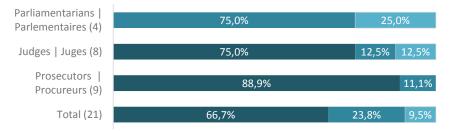
Slovak Republic | République slovaque (2020)*



Parliamentarians | 44,4% 11,1% Parlementaires (9) Judges | Juges (6) 83,3% 16,7% Prosecutors | 66,7% 33,3% Procureurs (9) Total (24) 62,5% 20,8% Serbia | Serbie (2023)*

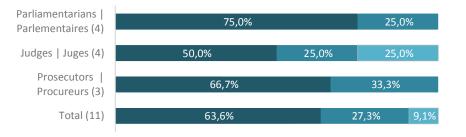


Slovenia | Slovénie (2018)*



Romania | Roumanie (2022)

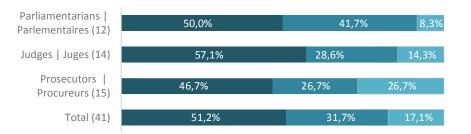
Spain | Espagne (2022)



Switzerland | Suisse (2024)*



Ukraine (2023)



Sweden | Suède (2017)*



Türkiye (2023)

Parliamentarians Parlementaires (7)		42,9%	57,1%
Judges Juges (12)	16,7%	33,3%	50,0%
Prosecutors Procureurs (12)	8,3%	41,7%	50,0%
Total (31)	9,7%	38,7%	51,6%

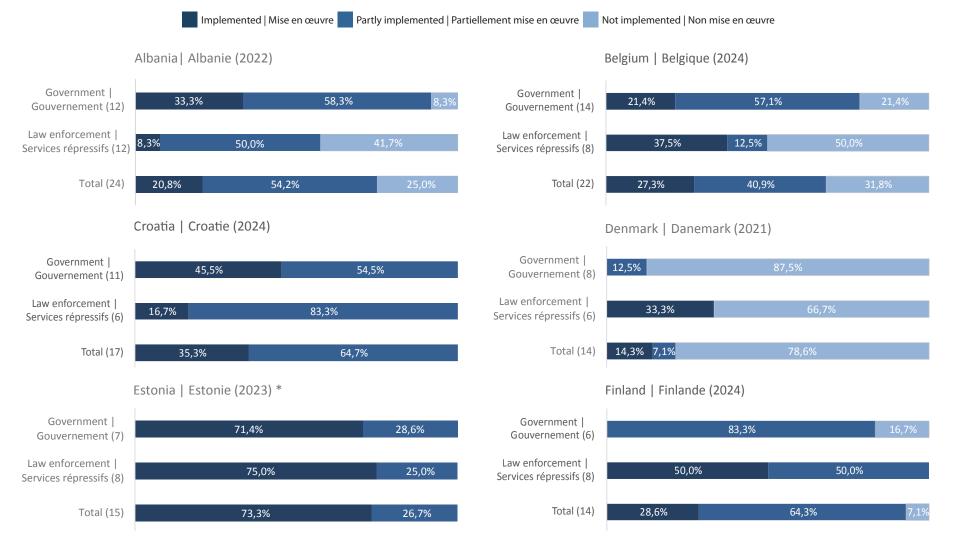
United Kingdom | Royaume -Uni (2017)*

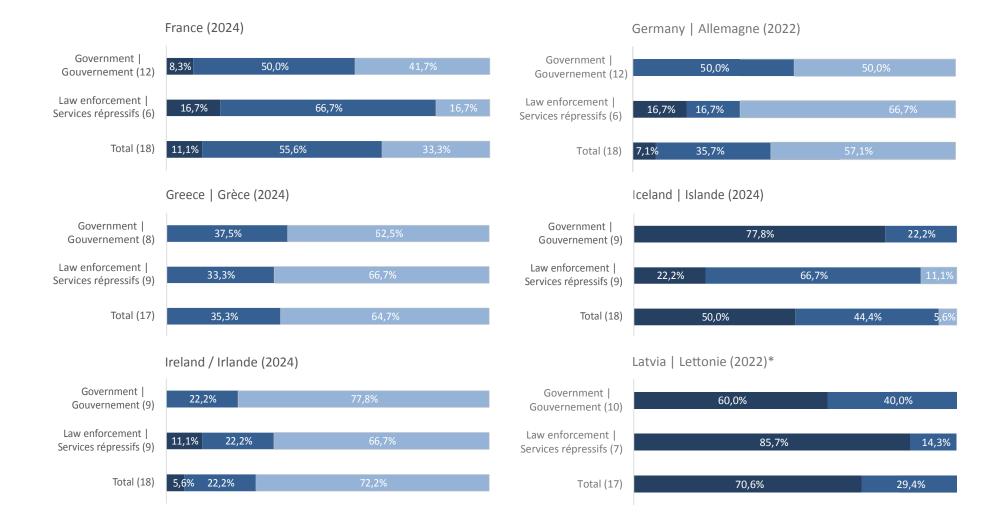


United States of America | Etats-Unis d'Amérique (2021)*

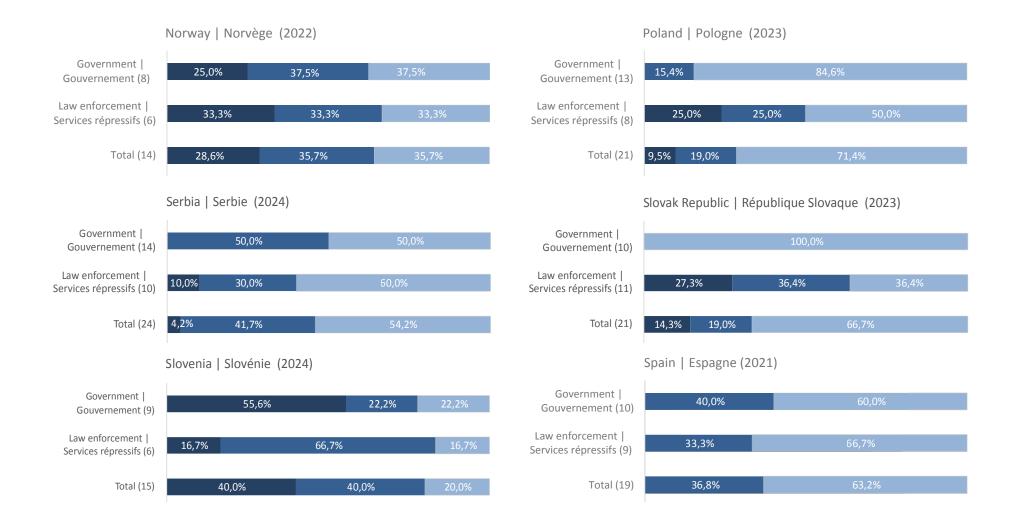


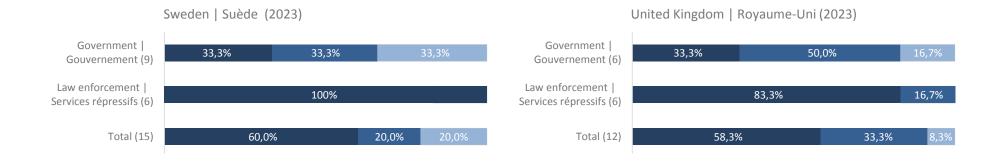
5th Evaluation Round – Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies











Appendices ► Page 47

APPENDIX 3 – CORE PROGRAMME (2024)

On-site visits in 2024

5th Evaluation Round

- Liechtenstein (15-19 April)
- San Marino (24-28 June)

3rd Evaluation Round

Kazakhstan (9-13 September)

High-level mission in the framework of the 5th Round compliance procedure

Slovak Republic (26 September)

Meetings in 2024

GRECO Plenary

- ▶ GRECO 96 (18-22 March)
 - Adoption of the final decisions on the evaluation parameters, modalities and questionnaire for the new 6th Evaluation Round
- GRECO 97 (17-21 June)
 - High-level session to mark GRECO's 25th Anniversary (20 June)
- GRECO 98 (18-22 November)
 - Exchange of views with Matthieu MORI, Secretary General of the Congress of Local and Regional Authorities of the Council of Europe

GRECO Bureau

- Bureau 104 (21 February)
- Bureau 105 (21 May)
- Bureau 106 (7 October)

GRECO Statutory Committee

33rd Meeting (9 October) – adoption of the adjustments to the Programme for 2024-2027 and the Budget for 2025; and decision not to amend at that point of time Article 15 of GRECO's Statute and to continue discussions on that point

Working Party for the preparation of GRECO's 6th Evaluation Round (WP-Eval VI)

2nd meeting (Paris, 20-21 February)

Evaluation reports adopted in 2024

5th Evaluation Round

- Andorra
- Armenia
- Georgia
- Italy
- Liechtenstein
- Monaco
- San Marino
- Switzerland

Compliance reports adopted in 2024

5th Evaluation Round compliance procedure

Austria, Bosnia and Herzegovina, Bulgaria, Greece, Hungary, Ireland, Lithuania, Montenegro, Serbia, procedures ongoing

Rule 32 revised procedures – insufficient compliance

Belgium, Croatia, Finland, France, Iceland, Slovenia – procedures opened

4th Evaluation Round compliance procedure

- Belgium, Hungary, Ukraine procedures on-going; Romania 4th Round procedures ongoing and procedures closed in respect of the Ad hoc (Rule 34) procedure
- Andorra, Armenia, Italy, Georgia, Germany, Republic of Moldova, San Marino, Spain, Switzerland procedures closed

Rule 32 procedures – globally unsatisfactory compliance

- Austria, Bosnia and Herzegovina, Denmark, Poland (including follow-up to the Ad hoc (Rule 34) procedure), Türkiye - procedures maintained
- Czechia procedures closed

3rd Evaluation Round compliance procedure

Switzerland - procedures closed

Joint 1st and 2nd Evaluation Rounds compliance procedure

Kazakhstan - procedures ongoing

APPENDIX 4 – GRECO DELEGATIONS (at 18 December 2024)

GRECO MEMBER STATES/ETATS MEMBRES DU GRECO

ALBANIA/ALBANIE

Ms Adea PIRDENI (Head of delegation) State Minister for Public Administration and Anti-Corruption Prime Minister's Office

Substitut/e Ms Silvana RAMADANI Advisor on Anticorruption Portfolio to the Minister for Public Administration and Anti-Corruption Ms Rovena PREGJA Head of Unit Directorate of Programs and Projects in the field of Anticorruption Ministry of Justice

Substitut/e Ms Xhulia MULLA Expert General Anticorruption Directorate Ministry of Justice

ANDORRA/ANDORRE

Mme Eva GARCIA LLUELLES (Cheffe de délégation) Ministère de la Justice et de l'Intérieur Relations et coopération internationales dans le domaine juridique

Substitut/e Mme Marta VILLAGRASA Juriste du Service des relations juridiques internationales et de la coopération Département de la Justice et de l'Intérieur Ministère de la Justice et de l'Intérieur

ARMENIA/ARMÉNIE

Mr Karen KARAPETYAN (Head of delegation) Deputy Minister of Justice Ministry of Justice Ms Tatevik KHACHATRYAN Head of the Monitoring Division Anti-Corruption Policy Development and Monitoring Department Ministry of Justice

Substitut/e Mr Yeprem KARAPETYAN Head Anti-Corruption Policy Development and Monitoring Department Ministry of Justice

AUSTRIA/AUTRICHE

Ms Brigitte ROM (Head of delegation) Federal Ministry of Justice Section IV - Criminal Law Division IV 1 (Substantive Criminal Law)

Substitut/e Mr Luca MAK Head of the Department for International Cooperation Federal Bureau of Anti-Corruption Federal Ministry of the Interior Ms Silvia THALLER Senior Public Prosecutor Public prosecutor's office for the prosecution of economic offences and corruption

Substitut/e Ms Assunta THURNHER-SIGMAIER Unit 2.3 International Cooperation Federal Bureau of Anti-Corruption Federal Ministry of the Interior

AZERBAIJAN/AZERBAÏDJAN

Mr Elnur MUSAYEV (Head of Delegation) Head of the Non-Criminal Proceedings Department Prosecutor's Office

Substitut/e Mr Emin NASIBOV Senior Adviser Department on the work with law enforcement agencies President's Office

BELGIUM/BELGIQUE

M. Carl PIRON (Chef de délégation) Attaché au Service de la Politique Criminelle DG Législation, Libertés et Droits Fondamentaux Service Public Fédéral Justice (SPF Justice) General Prosecutor's Office M. Jeroen CLARISSE Conseiller aux affaires juridiques de la Chambre des représentants

Mr Tabriz MUSAYEV

Executive Secretary

Mr Sabuhi ALIYEV

Parlement fédéral Palais de la Nation

Substitut/e

Anti-Corruption Commission

Head of Preventive Department

Anti-Corruption Department

Substitut/e Mme Marie DE BROE Attaché au Service de la Politique Criminelle DG Législation, Libertés et Droits Fondamentaux Service Public Fédéral Justice (SPF Justice)

BOSNIA AND HERZEGOVINA/BOSNIE-HERZÉGOVINE

Mr Adnan DLAKIĆ (Head of delegation) Expert Adviser for Combating Corruption Department for Combating Organized Crime and Corruption Ministry of Security Mr Nenad EŠPEK Expert Adviser for Combating Organized Crime Section for Combating Organized Crime & Corruption Ministry of Security

BULGARIA/BULGARIE

Mr Georgi RUPCHEV (Head of delegation) State Expert Directorate of International Legal Cooperation and European Affairs Ministry of Justice

Substitut/e Mr Florian FLOROV State Expert Directorate of International Legal Cooperation and European Affairs Ministry of Justice

CROATIA/CROATIE

Mr Marin MRČELA **President of GRECO** / **Président du GRECO** Justice of the Supreme Court

Mr Ivan CRNČEC (Head of delegation) State Secretary Ministry of Justice, Public Administration and Digital Transformation

Mr Krěsimir SIKAVICA Head of Criminal Intelligence Sector Criminal Police Directorate General Police Directorate Ministry of the Interior Substitut/e Mr Dražen JELENIC Deputy State Attorney General Substitut/e Mr Mladen BRUČIĆ-MATIC Director-General for European Affairs, International and Judicial Cooperation and Prevention of Corruption Ministry of Justice, Public Administration and Digital Transformation

CYPRUS/CHYPRE

Ms Alexia KALISPERA (Head of delegation) Senior Counsel of the Republic The Law Office of the Republic

Substitut/e Ms Theodora PIPERI-CHRISTODOULOU Counsel of the Republic A' The Law Office of the Republic

Ms Rena PAPAETI-HADJICOSTA Attorney of the Republic The Law Office of the Republic

CZECHIA/TCHÉQUIE

Ms Helena KLIMA LIŠUCHOVÁ (Head of delegation) Ms Johana TREŠLOVÁ Head of the International Cooperation and EU Senior Ministerial Counsellor Department Conflict of Interest and Anti-Corruption Department Ministry of Justice Ministry of Justice Substitut/e Substitut/e Ms Kristina KRÁL Ms Barbora HOLUŠOVÁ

Senior Ministerial Counsellor Methodology and Conflict of Interest Control Unit Conflict of Interest and Fight Against Corruption Department Ministry of Justice

Senior Ministerial Counsellor International Cooperation and EU Department Ministry of Justice

DENMARK/DANEMARK

Mr Jonathan GASSEHOLM (Head of Delegation) Senior Prosecutor National Special Crime Unit

Substitut/e Mr Andreas LAURSEN Senior Prosecutor National Special Crime Unit Mr Thomas ØSTERGAARD WIENAND Associate Prosecutor National Special Crime Unit

Advisor, Criminal Policy Department

Substitut/e Mr Jakob Gøtze PEDERSEN Chief Legal Advisor National Special Crime Unit

Ms Laura VAIK

Ministry of Justice

ESTONIA/ESTONIE

Ms Diana KÕMMUS (Head of delegation) Advisor **Criminal Policy Department** Ministry of Justice

Substitut/e Ms Kaie KÜNGAS Advisor of local government policy Ministry of Regional Affairs and Agriculture

FINLAND/FINLANDE

Mr Juha KERÄNEN (Head of delegation) **Ministerial Adviser** Department for Criminal Policy and Criminal Law Ministry of Justice

Ms Katariina SIMONEN **Ministerial Adviser** Ministry of the Interior Police Department

Substitut/e Ms Venla MÄNTYSALO Senior Specialist Department for Criminal Policy and Criminal Law Ministry of Justice

FRANCE

Mme Lise CHIPAULT (Chef de délégation) Magistrate - chargée de mission affaires civiles et pénales internationales auprès du Directeur des affaires juridiques Ministère des Affaires étrangères

Substitut/e M. Matthieu AUGUSTIN Magistrat Adjoint au chef du bureau du droit économique, financier et social, de l'environnement et de la santé publique Direction des affaires criminelles et de grâces Ministère de la Justice

Représentant (à titre honorifique) Representative (honorary) M. Michel GAUTHIER Président honoraire du GRECO / Honorary President of GRECO

GEORGIA/GÉORGIE

Mr Razhdeni KUPRASHVILI (Head of delegation) Head of Anti-Corruption Bureau

GERMANY/ALLEMAGNE

Mr Markus BUSCH (Head of delegation) Head of Division Economic, Computer, Corruption-related and Environmental Crime Division Federal Ministry of Justice

Substitut/e Ms Verena MEYER Legal Officer Federal Ministry of the Interior, Building and Community Division DG13 – Integrity, Corruption prevention, Sponsoring M. Olivier RENUCCI Sous-direction du conseil, de l'analyse stratégique et des affaires internationales Chef du département du conseil aux acteurs publics Agence française anticorruption (AFA)

Substitut/e Mme Léa BRETON Chargée de mission aux affaires internationales Agence française anticorruption (AFA)

Mr Giorgi BAGDAVADZE Head of the Department of International Relations Anti-Corruption Bureau

Ms Ulrike BUSSE Legal Officer Division PM 1 (Remuneration of Members) Deutscher Bundestag – Verwaltung –

Substitut/e Ms Andrea ERIKSSON Head of Division Division PM 1 (Remuneration of Members) Deutscher Bundestag - Verwaltung

GREECE/GRÈCE

Ms Maria GAVOUNELI (Head of delegation) Professor of International Law National & Kapodistrian University of Athens Faculty of Law Management Board, National Transparency Authority Ms Panagiota VATIKALOU Bureau Member / Membre du Bureau Judge, Court of Appeal of Athens

Substitut/e		
Mr Panagiotis KAOURAS		
Inspector Auditor – Inspections and Audits Unit		
National Transparency Authority		

Substitut/e Mr Dimosthenis STINGAS Judge at the Court of Appeal of Thessaloniki

HUNGARY/HONGRIE

Ms Adrienn KISNÉ SZABÓ (Head of Delegation) Head of Unit Department for European Home Affairs Cooperation Ministry of Interior

Substitut/e Mr Dávid SZAKÁCS Expert Department for European Home Affairs Cooperation Ministry of Interior

Ms Csilla ALFÖLDY Expert Department for the Prevention of Corruption National Protective Service

ICELAND/ISLANDE

Mr Kjartan ÓLAFSSON (Head of delegation) Senior Legal Advisor Ministry of Justice

Substitut/e Ms Hinrika Sandra INGIMUNDARDÓTTIR Senior Legal Advisor Deputy Director Ministry of Justice Mr Helgi Magnús GUNNARSSON Deputy Director of Public Prosecution Office of the Director of Public Prosecution

Substitut/e Ms Ásthildur VALTÝSDÓTTIR Senior Legal Advisor Prime Minister's Office

Ms Anne O'MAHONY

IRELAND/IRLANDE

Ms Suzanne GUNN (Head of delegation) Principal Officer Head of Economic, Organised and Transnational Crime Unit Department of Justice

Substitut/e Mr Nicholas J. MURPHY Assistant Principal Officer Economic, Organised and Transnational Crime Unit Department of Justice

ITALY/ITALIE

Mr Milto Stefano DE NOZZA (Head of delegation) Magistrate of the district anti–mafia directorate Ministry of Just<u>i</u>ce

Substitut/e Ms Emma RIZZATO Magistrate Ministry of Justice Government Reform Unit Department of Public Expenditure and Reform

Substitut/e Ms Rebecca CLARKE Justice Attaché Permanent Representation of Ireland to the Council of Europe

M. Giuseppe BUSIA Président Autorité Nationale Anti-Corruption (AN<u>A</u>C)

Substitut/e Mr Luca FORTELEONI Public Prosecutor Member of the Italian Anti-corruption Authority Steer Committee (ANAC)

KAZAKHSTAN

Mr Ulan SARKULOV (Head of delegation) First Deputy Chairman Anti-Corruption Agency Ms Leila IYLDYZ Officer-at-Large (Advisor) Anti-Corruption Agency Substitut/e Mr Mustafa MUSLIMOV Head of International Cooperation Unit Anti-Corruption Agency

LATVIA/LETTONIE

Mr Jēkabs STRAUME (Head of delegation) Director Corruption Prevention and Combating Bureau (KNAB)	Mr Viktors LAIZĀNS Chief Inspector Department of Strategy Corruption Prevention and Combating Bureau (KNAB)
Substitut/e Ms Anna AĻOŠINA Head of the Policy Planning and Communication Department Corruption Prevention and Combating Bureau (KNAB)	Substitut/e Mrs Inese ZELČA Head of the Policy Planning Division Policy Planning and Communication Department Corruption Prevention and Combating Bureau (KNAB)

LIECHTENSTEIN

Mr Fabian RITTER (Head of delegation) Diplomatic Officer Division for Economic Affairs and Development Office for Foreign Affairs

Substitut/e Mr Panagiotis POTOLIDIS-BECK Head of the Division for Economic Affairs and Development Office for Foreign Affairs

LITHUANIA/LITUANIE

Mr Augustas RUČINSKAS (Head of delegation) Chancellor of the Ministry of Justice Ministry of Justice

Substitut/e Ms Jolanta BERNOTAITĖ Head of the Corruption Prevention and Internal Investigation Division Ministry of Justice

LUXEMBOURG

Mme Barbara UJLAKI (Cheffe de délégation) Attachée Direction du droit pénal et pénitentiaire Ministère de la Justice

Substitut/e M. Patrick THILL Attaché Direction du droit pénal et pénitentiaire Ministère de la Justice Mr Harald OBERDORFER Judicial Affairs Division Office of Justice

Substitut/e Mr Michael JEHLE Judge | Landgericht

Ms Ilona TAMELĖ Senior Advisor Corruption Prevention and Internal Investigation Division Ministry of Justice

Substitut/e Ms leva LUKOŠEVIČIENĖ Chief Specialist International Cooperation Division Special Investigation Service

M. Laurent THYES Conseiller de Gouvernement première classe Directeur Direction du droit pénal et pénitentiaire Ministère de la Justice

MALTA/MALTE

Advisor

Unit for the coordination of activities against corruption

Department for international legal cooperation

Ms Victoria BUTTIGIEG Mr Mario SPITERI (Head of Delegation) Office of the Attorney General Attorney General Office of the Attorney General Substitut/e Mr Kevin VALLETTA Office of the Attorney General **REPUBLIC OF MOLDOVA/RÉPUBLIQUE DE MOLDOVA** Mr Valeriu CUPCEA Mr Alexandru CLADCO (Head of delegation) Head of the International Cooperation Directorate Prosecutor International legal assistance and Cooperation Unit National Anti-corruption Centre General Prosecutor's Office Substitut/e Mme Cornelia VICLEANSCHI **Ancien Procureur** Bureau du Procureur Général MONACO M. Jean-Laurent RAVERA (Chef de délégation) Mme Corinne LAFOREST DE MINOTTY Inspecteur Général en charge des fonctions de Chef Chargé de Mission auprès du Conseiller de de l'Inspection Générale de l'Administration Gouvernement-Ministre des Relations Extérieures et de la Coopération Substitut/e Mme Jennifer PALPACUER Chef de Division Service d'Information et de Contrôle des **Circuits Financiers MONTÉNÉGRO** Mr Dušan DRAKIĆ (Head of Delegation) Ms Samra SPAHIĆ Chief of Cabinet Acting Director Agency for Prevention of Corruption Agency for Prevention of Corruption Substitut/e Substitut/e Ms Nina SEKULOVIĆ Ms Maja JOVIĆ Advisor in Section for International Cooperation Chief of Cabinet Ministry of Justice Agency for Prevention of Corruption **NETHERLANDS/PAYS-BAS** Mr Loek MATHIES (Head of Delegation) Mr Hilbert ELSINGA Policy advisor international affairs Policy advisor police and security Ministry of the Interior and Kingdom Relations Ministry of Justice and Security NORTH MACEDONIA/MACÉDOINE DU NORD Nomination pending (Head of delegation) Ms Biljana IVANOVSKA President ... State Commission for the Prevention of Corruption Substitut/e Substitut/e Ms Elena SAZDOV Mr Vladimir GEORGIEV

Ministry of Justice Page 56 ► 24th General Activity Report (2024) of the Council of Europe's Group of States against Corruption (GRECO)

Commissioner

State Commission for the Prevention of Corruption

NORWAY/NORVÈGE

Ms Quyen Thi Thuy NGUYEN (Head of delegation) Ministry Adviser Ministry of Justice and Public Security Mr Jens-Oscar NERGARD Senior Adviser Ministry of Local Government and Modernisation

POLAND/POLOGNE

Mr Przemysław DOMAGAŁA (Head of delegation) Deputy Director Department of International Cooperation and Human Rights Ministry of Justice

Substitut/e Ms Marzena GÓRZYŃSKA Head Public International Law Division Department of International Cooperation and Human Rights Ministry of Justice

PORTUGAL

Mr António DELICADO (Head of Delegation) Bureau Member / Membre du Bureau Legal Adviser Directorate General for Justice Policy International Affairs Department Ministry of Justice Ms Alicja KLAMCZYNSKA Chief specialist Public International Law Division Department of International Cooperation and Human Rights Ministry of Justice

Substitut/e Mr Boguslaw NOCUŃ Prosecutor Public International Law Division Department of International Cooperation and Human Rights Ministry of Justice

Mr João Pedro Arsénio de OLIVEIRA European Affairs Coordinator Directorate General for Justice Policy International Affairs Department Ministry of Justice

Substitut/e

Ms Sara Nunes de ALMEIDA European Affairs Sub-Coordinator Directorate General for Justice Policy International Affairs Department Ministry of Justice

ROMANIA/ROUMANIE

Mr Sorin TĂNASE (Head of delegation) Deputy director Directorate for Crime Prevention Ministry of Justice

Substitut/e Ms Anca Luminiţa STROE Senior Legal Adviser with the statute of judge/ prosecutor Directorate for Crime Prevention Ministry of Justice

SAN MARINO/SAINT-MARIN

Ms Giovanna CRESCENTINI (Head of delegation) Head of the Institutional Secretariat Department of Institutional Affairs Mr Cosmin Daniel HĂLĂLĂU Chief Prosecutor Service for International Cooperation and Programmes National Anticorruption Directorate (DNA)

Substitut/e Mr Mihăiță BÂRLICI Chief commissioner of police Director Directorate for Prevention General Anticorruption Directorate Ministry of Internal Affairs

Ms Giulia MURATORI Legal Expert Department of Foreign Affairs SERBIA/SERBIE

Mr Dejan DAMNJANOVIĆ (Head of delegation) Director Agency for Prevention of Corruption

Substitut/e Ms Bojana SMARTEK Head of European Integration Strategic Planning and Development Group Agency for Prevention of Corruption

SLOVAK REPUBLIC/RÉPUBLIQUE SLOVAQUE

Ms Zuzana ŠTOFOVÁ (Head of delegation) Director, European and Foreign Affairs Division International Law Department Ministry of Justice

Substitut/e Ms Radka MONCOĽOVÁ Legal Counsellor, European and Foreign Affairs Division International Law Department Ministry of Justice Mr Jovan COSIC Assistant Minister at the Ministry of Justice

Substitut/e Ms Neda MARKOVIC Senior Advisor for Normative Affairs Ministry of Justice

Substitut/e

First Secretary

Ms Gloria VALENTINI

Department of Foreign Affairs

Ms Andrea POBOCIK Director General State Security and Corruption Prevention Division Government Office

SLOVENIA/SLOVÉNIE

Ms Vita HABJAN BARBORIČ (Head of delegation) Bureau Member / Gender Equality Rapporteur Head of the Development and Prevention Centre Commission for the Prevention of Corruption

Substitut/e Mr. Robert ŠUMI Chief Commissioner Commission for the Prevention of Corruption

SPAIN/ESPAGNE

Ms Ana ANDRES BALLESTEROS (Head of delegation)	Ms Lourdes MAGAÑA DE LARRIVA
Head of Unit	Technical advisor
Unit for Justice Affairs in the EU and International	Unit for Justice Affairs in the EU and International
Organizations	Organizations
Ministry of the Presidency, Justice and Relations	Ministry of the Presidency, Justice and Relations with
with the Parliament	the Parliament
Substitut(e) Ms María José CHÁVARRI IZU Advisor Directorate General for International Legal Cooperation Ministry of the Presidency, Justice and Relations with the Parliament	

SWEDEN/SUÈDE

Ms Monika OLSSON (Head of delegation) Vice-President of GRECO/Vice-présidente du GRECO Director

Division for Criminal Law Ministry of Justice

Substitut/e Mr Philip MIELNICKI Legal Adviser **Division for Criminal Law** Ministry of Justice

Mr Johan DAVIDSSON **Deputy Director** Department for Public Administration **Ministry of Finance**

SWITZERLAND/SUISSE

Mr Olivier GONIN (Head of delegation) Bureau Member / Membre du Bureau Deputy Head of the International Criminal Law Unit Conseiller scientifique Federal Department of Justice and Police FDJP Federal Office of Justice FOJ

Substitut/e **M. Jacques RAYROUD** Procureur général suppléant Ministère public de la Confédération M. Jean-Christophe GEISER Avocat Office fédéral de la justice

TÜRKİYE

Mr Mustafa Tayyip ÇİÇEK (Head of delegation) **Deputy Director General Directorate General for International Relations** and EU Affairs Ministry of Justice

Substitut/e Mr Mehmet Soner ÖZOĞLU Rapporteur Judge **Directorate General for International Relations** and EU Affairs Ministry of Justice

Ms Zehra Cansu ORHAN Chief of Department Directorate General for International Relations and EU Affairs Ministry of Justice

Substitut/e Mr Furkan USTAOĞLU Rapporteur Judge Directorate General for International Relations and EU Affairs Ministry of Justice

Ms Anastasiya Olehivna RADINA

UKRAINE

Mr Viktor PAVLUSHCHYK (Head of delegation) Head of the National Corruption Prevention Agency

Substitut/e Ms Svitlana PYLYPETS Head of International Cooperation Department National Corruption Prevention Agency

Chairperson Committee of the Verkhovna Rada on Anticorruption Policy Substitut/e Mr Denys MASLOV Chairperson

Committee of the Verkhovna Rada on Legal Policy

UNITED KINGDOM/ROYAUME-UNI

Mr David MEYER (Head of delegation) **Bureau Member / Membre du Bureau** Head of International Engagement & Rule of Law International, Rights and Constitutional Policy Directorate Ministry of Justice

Substitut/e Ms Erika HAWKINS Policy Advisor - Council of Europe Rights International Human Rights Policy Division Ministry of Justice Ms Fariha KHAN Head of Council of Europe Strategy International, Rights and Constitutional Policy Directorate Ministry of Justice

UNITED STATES OF AMERICA/ÉTATS-UNIS D'AMÉRIQUE

Ms Mary RODRIGUEZ (Head of delegation) Deputy Director Office of International Affairs (OIA) Criminal Division U.S. Department of Justice

Substitut/e Ms Finnuala TESSIER Attorney Advisor Office of Policy and Legislation Criminal Division U.S. Department of Justice Mr Alejandro A GARCIA Anti-Corruption Advisor, Multilateral Affairs Office of Global Programs and Policy (INL/GPP) Bureau of International Narcotics and Law Enforcement Affairs U.S. Department of State

Substitut/e Ms Amy H GRANGER Attorney Advisor U.S. Department of State

COUNCIL OF EUROPE/CONSEIL DE L'EUROPE

GRECO'S STATUTORY COMMITTEE/COMITÉ STATUTAIRE DU GRECO

Mr Sandy MOSS Ambassador Extraordinary and Plenipotentiary Permanent Representative of the United Kingdom to the Council of Europe **President of GRECO's Statutory Committee**

PARLIAMENTARY ASSEMBLY OF THE COUNCIL OF EUROPE (PACE)/ ASSEMBLÉE PARLEMENTAIRE DU CONSEIL DE L'EUROPE (APCE)

Ms Agnes Sirkka PRAMMER (Austria – Parliamentary Assembly Committee on Legal Affairs and Human Rights) Substitut/e Ms Elena-Simona SPĂTARU (Romania – Parliamentary Assembly Committee on Legal Affairs and Human Rights)

EUROPEAN COMMITTEE ON LEGAL COOPERATION/COMITÉ EUROPÉEN DE COOPÉRATION JURIDIQUE (CDCJ)

No nomination

Pas de nomination

EUROPEAN COMMITTEE ON CRIME PROBLEMS/COMITÉ EUROPÉEN POUR LES PROBLÈMES CRIMINELS (CDPC)

No nomination

Pas de nomination

COUNCIL OF EUROPE DEVELOPMENT BANK/BANQUE DE DÉVELOPPEMENT DU CONSEIL DE L'EUROPE (CEB)

Ms Katherine DELIKOURA Chief Compliance Officer

OBSERVERS/OBSERVATEURS

ORGANISATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD)/ORGANISATION DE COOPÉRATION ET DE DÉVELOPPEMENT ÉCONOMIQUES (OCDE)

Ms Olga SAVRAN Anti-Corruption Network for Transition Economies within Anti-Corruption Division

Substitut/e Ms France CHAIN Anti-Corruption Division Directorate for Financial and Enterprise Affairs Substitut/e Ms Tanya KHAVANSKA Anti-Corruption Division Directorate for Financial and Enterprise Affairs

UNITED NATIONS, REPRESENTED BY THE UN OFFICE ON DRUGS AND CRIME (UNODC)/ NATIONS UNIES, REPRÉSENTÉES PAR L'OFFICE DES NATIONS UNIES CONTRE LA DROGUE ET LE CRIME (ONUDC)

Ms Brigitte STROBEL-SHAW Secretary of the Conference of the States Parties of the United Nations Convention against Corruption Chief - Corruption and Economic Crime Branch

Substitut/e Mr Artem SERGEEV Associate Crime Prevention and Criminal Justice Officer Convention Support Section Corruption and Economic Crime Branch Mr Shervin MAJLESSI Chief Convention Support Section Corruption and Economic Crime Branch

Substitut/e Ms Melanie CHABERT Associate Crime Prevention and Criminal Justice Officer Convention Support Section Corruption and Economic Crime Branch

INTERNATIONAL ANTI-CORRUPTION ACADEMY/ ACADÉMIE INTERNATIONALE DE LUTTE CONTRE LA CORRUPTION (IACA)

Ms Slagjana TASEVA Dean and Executive Secretary Mr Jaroslaw PIETRUSIEWICZ Chief of Staff, Head of Strategic Partnerships

Substitut/e Ms Ana Paula LIVIA SAPOZHNICOVA Strategic Partnerships Officer

ORGANIZATION OF AMERICAN STATES (OAS)/ORGANISATION DES ÉTATS AMÉRICAINS (OEA)

Mr Jorge GARCIA-GONZALES Director of the Department of Legal Cooperation Secretariat for Legal Affairs

INTERNATIONAL INSTITUTE FOR DEMOCRACY AND ELECTORAL ASSISTANCE/ INSTITUT INTERNATIONAL POUR LA DÉMOCRATIE ET L'ASSISTANCE ÉLECTORALE (International IDEA)

Mr Sam VAN DER STAAK Senior Programme Manager

OSCE OFFICE FOR DEMOCRATIC INSTITUTIONS AND HUMAN RIGHTS (OSCE/ODIHR)/ BUREAU DES INSTITUTIONS DÉMOCRATIQUES ET DES DROITS DE L'HOMME DE L'OSCE (OSCE/BIDDH)

Ms Yulia NETESOVA	Ms Nina CHANTURIA
Chief of Democratic Governance and Gender Unit	Associate Democratic Governance Officer
EUROPEAN UNION/UNION EUROPÉENNE	
Ms Ute STIEGEL	Mr Jeroen BLOMSMA
Deputy Head of Unit	Head of Sector, Anti-Corruption
A4: Enforcement, transparency and rule of law	A4: Enforcement, transparency and rule of law
monitoring	monitoring
DG Migration and Home Affairs	DG Migration and Home Affairs
European Commission	European Commission
Substitut/e Ms Dora SCHAFFRIN First Secretary Delegation of the European Union to the Council of Europe	Substitut/e Ms Elitsa MINCHEVA Policy officer, Anti-Corruption A4: Enforcement, transparency and rule of law monitoring DG Migration and Home Affairs European Commission

APPENDIX 5 – CONTACTS AND OUTREACH (2024)

GRECO Plenary

Exchange of views with Matthieu MORI, Secretary General of the Congress of Local and Regional Authorities of the Council of Europe (98th GRECO Plenary Meeting, 20 November)

European Union (EU)

- Horizontal consultations at the request of the European Commission, DG-JUST and DG-HOME (online, 22 January) – Secretariat
- European Union | Council of Europe project Support to the Justice Reform in the Republic of Moldova meeting with representatives of the Ministry of Justice of the Republic of Moldova (Strasbourg, 31 January) - Secretariat
- Exchange with the Democracy, Rule of Law and Fundamental Rights Monitoring Group (DRFMG) of the European Parliament Committee on Civil Liberties, Justice and Home Affairs (LIBE) (Online, 22 February) Secretariat
- Bilateral discussions at the request of the European Commission, DG-NEAR (Strasbourg, 27-28 May) - Secretariat
- European Union | Council of Europe Central Asia Rule of Law Programme 2020-2024 meeting with representatives of the Supreme Court and the Judicial Administration of Kazakhstan (Strasbourg, 14 May) - Secretariat
- EU Network Against Corruption Workshop on Asset Declaration Systems (Brussels, 25 June) Secretariat
- First meeting of the Anti-corruption Partnership Forum (online, 3 July) Secretariat
- > 2nd Meeting of the EU Network Against Corruption (Brussels, 3 October) Secretariat
- Meeting between the European Union's Article 36 Committee (CATS) and the Council of Europe Secretariat (Brussels, 9 December) – Secretariat
- Meeting with MEP Adrian-George AXINIA (ECR Group, Vice-Chair of AUR, Romania) and Mr George SIMION, President of the AUR Party and leader of the AUR parliamentary group in the Parliament of Romania (Strasbourg, 17 December) – Secretariat

International Partnership against Corruption in Sports (IPACS)

Steering committee meeting and General Annual Meetings (online, 11 October) – Secretariat

Organisation for Economic Co-operation and Development (OECD)

- ► OECD Global Anti-Corruption and Integrity Forum (Paris, 26-27 March) Secretariat
- OECD Working Group on Bribery in International Business Transactions WGB (Paris, 11-13 June; online, 8-11 October) – Secretariat
- OECD Working Party on Public Integrity and Anti-Corruption (Paris, 15-16 October) Secretariat
- OECD-Anti-Corruption Network for Eastern Europe and Central Asia (OECD-ACN) 23rd Monitoring Plenary and 29th Steering Group Meetings (Paris, 17 and 19 October) – Secretariat
- WGB GRECO bilateral secretariat consultation (online, 16 December 2024) Secretariat

Organisation for Security and Co-operation in Europe/Office for Democratic Institutions and Human Rights (OSCE/ODIHR)

 OCEEA/ODIHR Anti-Corruption Day Conference Looking Back and Looking Ahead on the Fight against Corruption (Vienna, 9 December) – David MEYER, President-elect (United Kingdom) on <u>GRECO's role in</u> <u>shaping political will to fight corruption</u>

Organisation de la Francophonie (OIF)

 Francophone Conversation: The fight against corruption : working for honest and transparent governance at the service of the people (Paris, 25 January) – Secretariat

United Nations

 Second Resumed 15th Session of the Implementation Review Group (IRG) of the United Nations Convention against Corruption (UNCAC) (Vienna, 4-8 November) – Secretariat

Other contacts

- ► Release of a thematic issue of EUCRIM on corruption including a guest editorial by GRECO's President
- Study visit of students participating in the Model European Parliament (MEP) Limburg (Strasbourg, 25 January) - Secretariat
- European perspectives on combatting corruption and money laundering: how is Nordic and European best practice applicable in Bulgaria, event organised by the Nordic embassies in Bulgaria and the embassy of Norway in Romania (accredited Bulgaria) in partnership with the Anti-Corruption Fund Foundation (ACF) (Sofia, 22-23 February) – Secretariat
- Presentation on GRECO's work for students at the University of Montpellier (Online, 11 April 2024)
 Secretariat
- Meeting with Claude-Laurent GENTI, Co-President, Pierre-Stanley PÉRONO, First Vice-President, Florine AMOUGOU, Vice-President of the INGO Conseil international pour la transmission intellectuelle (CITI) (Strasbourg, 28 May) – Secretariat
- Meeting with the 2023/2024 winners of the Marianne Initiative for Human Rights Defenders (Initiative Marianne pour les défenseurs des droits de l'Homme) (Strasbourg, 31 May) - Secretariat
- MATRA Training on Democratic institutions for study visitors from The Hague Academy for Local Governance (online, 7 June) – Secretariat
- Transparency International (TI) 21st International Anti-Corruption Conference (IACC) Confronting global threats: Standing up for integrity (Vilnius, 18-21 June) – Secretary General and Director of Security, Integrity and the Rule of Law
- Study visit of representatives of the Anti-corruption Commission, the Office of the ombudsman, the Attorney General's office and the Human Rights Commission of Zambia, organised by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) on behalf of the Federal Ministry for Economic Cooperation and Development of Germany, in the framework of the project Enabling Access to Justice, Civil Society Participation and Transparency (EnACT) (Strasbourg, 25 June) Secretariat
- Study visitors in the framework of the ETKİNİZ EU Support Programme on Monitoring Compliance with International Human Rights Framework in Türkiye (Strasbourg, 9 July) - Secretariat
- Cooperation and synergy meeting with GRECO Secretariat counterparts in the OECD, OAS and UNODC to discuss civil society engagement (online, 18 July).
- Bi-annual meeting of the International Political Science Association (IPSA) Research Committee on Political Finance and Political Corruption (Oxford, 31 July – 2 August) – Yves-Marie DOUBLET, GRECO evaluator (France) and Secretariat
- Meeting with Bernd HÜTTEMANN, Board Member, Transparency International Germany (TI DE) (Strasbourg, 26 September) – Secretariat
- Study visit of judges of the Supreme Court of Justice and members of the Superior Council of the Magistracy of the Republic of Moldova (Strasbourg, 7 October) – Secretariat
- Exchange with representatives of the General Police Inspectorate of Luxembourg (online, 17 October)
 Secretariat
- Presentation on GRECO's work for students of the Master Human Rights Law in a Changing World (University of Strasbourg, 7 November) Secretariat
- Meeting with the Director General Public Governance, Democracy and Rule of Law, Ministry of the Interior and Kingdom Relations of the Netherlands (Strasbourg, 21 November) - Secretariat.

- European Partners Against Corruption | European contact-point network against corruption (EPAC/EACN)
 23rd Annual Professional Conference and General Assembly (Bucharest, 26-27 November) Secretariat
- Statement by GRECO's President on the occasion of International Anti-corruption Day: States must take determined action to protect democracy against corruption (9 December) - President

Council of Europe

- On the occasion of the Opening of the Judicial Year 2024, Síofra O'LEARY, President of the European Court of Human Rights refers to the attention being paid in the European Commission's Rule of Law Report and the Court of Justice of the European Union to the vital contributions of the Venice Commission, GRECO or CEPEJ alongside the judgments of the Court, to the defence of democracy and the rule of law
- Event held in the margins of the 2nd part of the 2024 Session of the Parliamentary Assembly of the Council of Europe (PACE) *Experience and prospects for cooperation between PACE and Kazakhstan* (Strasbourg, 18 April) - Secretariat
- First meeting of the Steering Committee on Democracy (CDDEM) (Strasbourg, 13-14 May 2024) Secretariat
- European Union | Council of Europe Central Asia Rule of Law Programme 2020-2024 meeting with representatives of the Supreme Court and the Judicial Administration of Kazakhstan (Strasbourg, 14 May) Secretariat
- Exchange of views and presentation of GRECO's General Activity Report 2023 to the Committee of Ministers (1469th meeting of the Ministers' Deputies, 29 May) – President, Secretariat
- ▶ Press launch of GRECO's General Activity Report 2023 (Brussels, 30 May) President, Secretariat
- 9th edition of the African University on Youth and Development #Fortheculture of Human Rights and the Rule of Law organised by the North-Centre of the Council of Europe (Cape Verde, 25-29 June) – António DELICADO, Vice President-elect (Portugal)
- Secretariat community of practice on civil society engagement 2nd meeting (Strasbourg, 26 June) – Secretariat
- Congress of Local and Regional Authorities of the Council of Europe Conference of national associations of local and regional authorities organised on the occasion of the 75th anniversary of the Council of Europe and the 30th anniversary of the Congress, under the auspices of the Lithuanian Presidency of the Committee of Ministers (Strasbourg, 12-13 September) – Secretariat
- First meeting of the Working Group of the Steering Committee on Democracy on Parameters for the application and implementation of the Reykjavik Principles for Democracy (GT-P) (online, 23-24 September)
 Secretariat
- Ministry of Foreign Affairs of San Marino | Venice Commission conference Aspects of Constitutionalism in European small-sized States (San Marino, 14 October) – Panagiota VATIKALOU, Bureau member (Greece) highlights GRECO's positive collaboration with small-sized states
- Exchange of views between GRECO's President and the Steering Committee on Democracy (CDDEM) on parameters to facilitate the application and implementation of the Reykjavik Principles for Democracy (Second meeting of the CDDEM, Strasbourg and online, 29-30 October) – President and Secretariat
- Award to GRECO's outgoing President, Marin MRČELA, Justice of the Supreme Court of Croatia, of the Pro Merito Medal, a distinction granted by the Secretary General of the Council of Europe (Strasbourg, 21 November)
- CEPEJ study visit for magistrates from the *Ecole nationale de la magistrature* (ENM) of France (Strasbourg, 5 December) – Secretariat
- Second meeting of the Working Group of the Steering Committee on Democracy on Parameters for the application and implementation of the Reykjavik Principles for Democracy (GT-P) (online, 9-10 December)
 Secretariat

APPENDIX 6 – GRECO SECRETARIAT

Directorate General Human Rights and Rule of Law Directorate of Security, Integrity and Rule of Law

Livia STOICA BECHT, Executive Secretary of GRECO, Head of the Economic Crime and Corruption Department Laura SANZ-LEVIA, Deputy Executive Secretary of GRECO, Head of division

Senior legal advisors Sophie MEUDAL-LEENDERS David DOLIDZE Stéphane LEYENBERGER Ylli PECO Anne WEBER Tanja GERWIEN Victoria CHERNIYCHUK

Giulia GIARDINO, Junior Legal Officer

Irma DZANKOVIC-ARSLAN, Personal assistant to the Executive Secretary and Head of Department

Interns: Natia GELASHVILI (Georgia); Angelos NIKOLAKIS (Greece) Study visitor (Handong International Law School, South Korea): Aiki HATANAKA (Japan)

Central office and assistance

Penelope PREBENSEN, Head of Central Office Carla RIQUELME Hayarpi ARSHAKYAN

APPENDIX 7 - MEMBERSHIP (2024)¹⁰

By date of accession

Belgium, Bulgaria, Cyprus, Estonia, Finland, France, Germany, Greece, Iceland, Ireland, Lithuania, Luxembourg, Romania, the Slovak Republic, Slovenia, Spain, Sweden (founding states - 1 May 1999)

Poland (date of accession: 20 May 1999), Hungary (9 July 1999), Georgia (16 September 1999), United Kingdom (18 September 1999), Bosnia and Herzegovina (25 February 2000), Latvia (27 July 2000), Denmark (3 August 2000), United States of America (20 September 2000), North Macedonia (7 October 2000), Croatia (2 December 2000), Norway (6 January 2001), Albania (27 April 2001), Malta (11 May 2001), Republic of Moldova (28 June 2001), Netherlands (18 December 2001), Portugal (1 January 2002), Czechia (9 February 2002), Serbia (1 April 2003), Türkiye (1 January 2004), Armenia (20 January 2004), Azerbaijan (1 June 2004), Andorra (28 January 2005), Ukraine (1 January 2006), Montenegro (6 June 2006), Switzerland (1 July 2006), Austria (1 December 2006), Italy (30 June 2007), Monaco (1 July 2007), Liechtenstein (1 January 2010), San Marino (13 August 2010), Kazakhstan (1 January 2020).

10. The Russian Federation ceased to be a member of GRECO on 1 July 2023. Belarus ceased to be a member of GRECO on 1 May 2024.

www.coe.int

The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the







CONSEIL DE L'EUROPE