Strasbourg, 21 November 2025 Greco(2025)12

101st GRECO Plenary Meeting

Strasbourg, 18, 19 and 21 November 2025

DECISIONS

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Directorate General I
Human Rights and Rule of Law
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At its 101st Plenary Meeting (Strasbourg, 18, 19 and 21 November 2025) which was chaired by **David Meyer (President of GRECO, United Kingdom)**, the Group of States against Corruption (GRECO):

1. noted the President's welcome message to Heads of delegation and representatives, thanking them for their contribution to GRECO's work where their input and coordination at national level facilitate the results achieved by GRECO's monitoring, and for the expertise they bring to the mutual evaluation process in the plenary for the examination of reports addressed to other member States;

2. noted the President's reminder that delegations are appointed on a permanent basis (Rule 3). Delegation members are the primary interlocutors for all communications. Only designated representatives attend plenary meetings. It is very important that changes to a delegation are promptly communicated by the Head of delegation to the Secretariat in order to keep the List of Representatives and corresponding mailing lists up to date;

3. adopted the agenda of the meeting;

Information

4. took note of the items discussed and decisions taken by the Bureau at its 109th meeting (Greco(2025)11);

5. took note of information provided as follows:

David Meyer, President of GRECO

- the President expressed to the Türkiye authorities, and in particular the Head of delegation in GRECO, Ahmet Ulutaş, the sincere appreciation of the delegation that had carried out the high-level mission to Türkiye (18 June 2025) for its excellent organisation (cf. items 10 and 11 below);

- in 2025, the 6th Round evaluation visits completed so far include Estonia (Tallinn and Tartu, 7-11 April), the Slovak Republic (Bratislava and the region of Trenčin, 19-23 May); Luxembourg (Luxembourg City and Dudelange, 22-26 September). The final visit of the year is scheduled to take place in Slovenia (Ljubljana and Hrastnik, 24–28 November);

- in accordance with the decision previously taken by GRECO, the high-level mission to Poland will take place on 28 November;

- the President had met on 16 June with the European Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection, Michael McGrath to exchange views on planned developments at the EU level as well as within GRECO, and to discuss possible avenues for enhanced cooperation going forward;

- he had also participated in the meeting of Alain Berset, Secretary General of the Council of Europe with the Presidents and Secretaries of the Monitoring and Advisory Bodies of the Council of Europe (Strasbourg, 16 September);

- he has also spoken to representatives of the Verkhovna Rada of Ukraine and the National Assembly of North Macedonia (London, 9-10 September), and respectively of the National Assembly of Armenia (London, 15 October) at events organised by the OSCE/ODIHR;

- he opened the event "*Transparency and Privacy in Democratic Societies – Two Sides of the Same Coin*", alongside Helena Jäderblom, President of the Council of Europe Access Info Group and Beatriz de Anchorena, Chair of the Committee of Convention 108 (Strasbourg, 4 November);

- he has also contributed an article on GRECO's work for issue 140 of the journal *L'Observateur de Bruxelles*, a special edition on anti-corruption issues, yet to be published;

6. took note of information provided as follows:

António Delicado, Vice-President of GRECO

- his contribution as a speaker to the third plenary meeting of the EU Network against corruption (Brussels, 15 October) on "*Enhancing a culture of integrity and transparency through education*";

- his role at the forthcoming *IV Regional Conference on the Prevention of Corruption and Transparency*, organised by the Regional Government of the Azores, where he will speak about GRECO's 6th Evaluation Round (5 December);

Alexia Kalispera (Bureau member)

- her contribution as a speaker the round table *on Strengthening ethics and integrity in parliaments*, organised by the PACE Committee on Rules, Ethics and Immunities together with the Standing Committee of the House of Representatives on Institutions, Merit and the Ombudsmen of Cyprus (Limassol, 14 November);

Sorin Tănase (Bureau member)

- his contribution as a speaker at an event on *The financing of political parties,* where he referred to GRECO's recommendations under the Third Evaluation Round parties at the (Faculty of Law, Bucharest, 9 October);

Vita Habjan Barborič (Gender Equality Rapporteur)

- her contribution as a speaker to the event "*Transparency and Privacy in Democratic Societies – Two Sides of the Same Coin*" (Strasbourg, 4 November);

Livia Stoica Becht, Executive Secretary of GRECO

- the Executive Secretary's participation in several events, including the *14th Annual Anti-Bribery and Corruption Forum – A global outlook* (London, 12 November);

- contributions by the Secretariat and participation in the following meetings: the UNODC's First Resumed 16th Session of the Implementation Review Group (IRG) of the United Nations Convention against Corruption (UNCAC) and 16th Session of the Working Group on the Prevention of Corruption (Vienna, 16-19 June); the Democracy, Rule of Law and Fundamental Rights Monitoring Group (DRFMG) of the European Parliament Committee on Civil Liberties, Justice and Home Affairs (LIBE) meetings (online, 2 July and 24 September); PACE Committee on the Honouring of Obligations and Commitments by Member States of the Council of Europe (Strasbourg, 23 June and Paris, 9 September); the Summer School on Council of Europe anti-corruption instruments (Strasbourg, 1 July); the OECD's Anti-Corruption Network for Eastern Europe and Central Asia plenary (8-9 July); the coordination meeting of the Secretariats of multilateral anti-corruption peer-review mechanisms (GRECO, UNODC, OECD-WGB, OAS-MESICIC) (online, 31 July); the Council of Europe's Working group on parameters to facilitate the application and implementation of the Reykjavik Principles for Democracy (Strasbourg, 13-14 October); the third meeting of the European Network against Corruption (Brussels, 15 October); Interpol's Anticorruption and Asset Recovery Global Conference, (Abu Dhabi, 11-13 November);

- the adoption by GRECO's Statutory Committee on 15 October 2025 of the Scale of Contributions for 2026, of the Budget of the Enlarged Agreement for 2026, as well as of its Budget for 2027 on a provisional basis within the framework of the quadrennial Programme for 2024-2027;

- preparations for GRECO's participation in the Eleventh session of the Conference of the State Parties to the United Nations Convention against Corruption (COSP-11) (15-19 December) and the joint special event on *Collective Accountability: Milestones and Future Directions of Global Anti-Corruption Reviews*, organised by UNODC, GRECO, MESICIC and the OECD-WGB Secretariats;

- she welcomed the arrival in the Secretariat of Rebecca Ottolenghi (on secondment from the United Kingdom), Alberto Romeo (on secondment from Italy), Masa Gruden and Lennart Marten (trainee).

Evaluation procedures

Sixth Round - Preventing corruption and promoting integrity at the sub-national level

7. approved the composition of the teams responsible for the 6th Round evaluations of Cyprus, Finland, Iceland, North Macedonia and Sweden (GrecoEval6(2025)8);

8. recalled that member states are provided with a predetermined advance schedule for the 6th Round to facilitate the identification of appropriate sub-national authorities for evaluation and it is essential that members meet the deadline fixed for communicating to the Secretariat the sub-national authorities they propose and the completed questionnaire;

Compliance procedures

9. noted the President's call on all Heads of delegation to strictly respect the submission deadlines fixed by GRECO in each report adopted which was essential to ensure the proper conduct of compliance procedures;

10. took note of the information provided concerning the high-level mission to **Türkiye** (18 June 2025) carried out pursuant to Rule 32 revised, paragraph 2 (iii) and led by GRECO's President;

11. welcomed the reassurances received of the commitment of the authorities of **Türkiye** at the highest level to implement the outstanding recommendations issued by GRECO in the Fourth Evaluation Round;

Fourth Round – Corruption prevention in respect of members of parliament, judges and prosecutors

12. adopted the 2nd Addendum to the 2nd Compliance Fourth Round Compliance Report on:

    - **Belgium** (GrecoRC4(2025)5)

    and closed the Fourth-Round compliance procedure in respect of this member;

13. adopted the Addendum to the 2nd Fourth Round Compliance Report on:

    - **Romania** (GrecoRC4(2025)4)

    pursuant to Rule 31 revised, paragraph 9, asked the Head of delegation to submit additional information on the implementation of the outstanding recommendations by 30 November 2026;

14. invited the authorities of Belgium and Romania to authorise, as soon as possible, the publication of the reports mentioned in decisions 12 and 13 above;

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

15. adopted, in the framework of Rule 31 revised bis, the 2nd Addenda to the 2nd Fifth Round Compliance Reports on:

- **Iceland** (GrecoRC5(2025)20)
- **Finland** (GrecoRC5(2025)23)
- **Slovenia** (GrecoRC5(2025)21)

and closed the Fifth-Round compliance procedure in respect of these members;

16. adopted the Addenda to the 2nd Fifth Round Compliance Reports on:

- **Belgium** (GrecoRC5(2025)22)
- **Croatia** (GrecoRC5(2025)18)
- **France** (GrecoRC5(2025)19)

and within the meaning of Rule 31 revised bis, paragraph 10, concluded that these members were **not in sufficient compliance** with the Fifth Round recommendations;

17. pursuant to Rule 32 revised, paragraph 2 (i) asked the respective Heads of delegation to provide a report on progress in implementing the outstanding recommendations by 30 November 2026 at the latest;

18. in accordance with Rule 32 revised, paragraph 2 (ii) c), invited the Secretary General of the Council of Europe to send a letter to the Ministers of Foreign Affairs of Belgium, Croatia and France - with a copy to the Heads of delegation concerned – on the need for determined action to be taken with a view to achieving tangible progress as soon as possible;

19. invited the authorities of Belgium, Croatia, Finland, France, Iceland and Slovenia to authorise, as soon as possible, the publication of the reports mentioned in decisions 15 and 16 above;

Programme of Activities 2026

20. adopted its Programme of Activities for 2026 (Greco(2025)10-fin) which outlines the main objectives and actions for GRECO's core monitoring work, as well as its institutional role and the contacts and synergies that it pursues;

21. noted the need to maintain some degree of flexibility in the planning to respond to scheduling requirements that could not be anticipated at this stage, and that if the examination of compliance reports needed to be postponed to ensure a feasible agenda for plenary meetings, the Secretariat would agree – with the members concerned – appropriate new deadlines for situation reports;

Exchanges of views

Norway's Dilemma Archive – A Concrete Tool for Strengthening Police Ethics and Conduct

22. welcomed this exchange of views which presented a practical and operational tool offering concrete guidance for police leadership in promoting and safeguarding police ethics and conduct;

Transparency of documents

23. welcomed the information received, followed by an exchange of views with Ambassador Sandy Moss, President of GRECO's Statutory Committee and Ambassador Gabriel Revel, President of the Committee of Ministers' Group of Rapporteurs on Legal Co-operation (GR-J), and agreed to prepare a further proposal regarding increased transparency and the automatic publication of GRECO's reports;

Thematic paper on Whistleblower Protection in Law Enforcement

24. took note of and welcomed the thematic paper prepared by the Secretariat;

Topical anti-corruption developments/events in member States (Item 4)

25. took note of information provided at the request of the Bureau by the Delegations of Kazakhstan[1], Romania[2], Ukraine[3], as well as information shared by Finland, Malta, Slovenia, Spain, and Sweden on recent developments;

26. invited Delegations that wished their presentations to be distributed to all GRECO members to send them to the Secretariat by the end of the week;

Information from observer organisations and Council of Europe bodies

27. took note of the information provided by the representatives of the European Union and of OSCE/ODIHR on ongoing work and initiatives planned in the area of anti-corruption;

Side event – Strengthening Good Governance: Consolidating Integrity and Accountability at the Sub-National Level (20 November)

28. warmly welcomed the joint organisation of this event by GRECO and the Congress of Local and Regional Authorities, as well as the discussions held and the opportunity it provided for exchanges with representatives of the Congress, mayors, international organisations and non-government organisations, youth, and other experts on issues related to the 6th Evaluation Round;

Publication of Reports[4]

29. called on the authorities of the member States concerned to authorise without further delay and in line with the long-standing practice the publication of reports previously adopted by GRECO while noting that the President particularly urged the following delegations to authorise publication

[1] On the reorganisation of the Agency for Combating Corruption and related developments contained in the Presidential Decree of 30 June 2025 on Measures to Improve the System of State Administration.

[2] On latest developments regarding the publication of asset declarations, in view of the Constitutional Court's recent decision on this issue, as well as other new developments.

[3] On recent developments regarding the independence of the National Anti-Corruption Bureau (NABU) and the Specialised Anti-Corruption Prosecutor's Office (SAPO).

[4] *Action to be taken when publishing adopted reports* (decision 26, GRECO 58):
- agree a same-day publication date with the Secretariat
- clearly mark both the date of adoption and date of publication on the cover page
- make the national language version available and easily accessible on a domestic website
- notify the Secretariat of the location of the report by communicating the internet link to it
- include a link on the domestic website to the official language versions on GRECO's website.

rapidly: Azerbaijan and Türkiye (reports from 2023); Czechia, Hungary and Türkiye (reports from 2024); [5]

Any other business

30. noted that for the 2025 General Activity Report (which would be on the agenda of the March 2026 Plenary Meeting), only the compliance reports published by **12 December 2025** would be taken into account in the statistics on compliance levels in the Fourth and Fifth Rounds; the cut-off date for informing the Secretariat of any publications still to take place in 2025 is **5 December 2025**;

Future meetings

31. took note of the following dates:

- **110th Bureau Meeting**: 3 February 2026 – **online**
- **102nd Plenary Meeting**: Strasbourg, 23-27 March 2026 – **in person only**
- **103rd Plenary Meeting**: Strasbourg, 8-12 June 2026 – **in person only**
- **104th Plenary Meeting**: Strasbourg, 16-20 November 2026 – **in person only**.

[5] **Adopted in March 2023:** Fifth Round Evaluation Report on Azerbaijan; **adopted in December 2023:** Fifth Round Evaluation Report on Türkiye; **adopted in June 2024:** Fifth Round Compliance Report on Hungary; **adopted in November 2024**: Fourth Round 2nd Compliance Report on Hungary, Fourth Round 5th Interim Compliance Report on Türkiye and Fourth Round 3rd Interim Compliance Report on Czechia; **adopted in March 2025**: Third Round Evaluation Report on Kazakhstan, Fifth Round Compliance Report on Azerbaijan; **adopted in June 2025:** Fourth Round 2nd Compliance Report on Liechtenstein, Fifth Round Compliance Report on Czechia, Fifth Round Addendum to the 2nd Compliance Report on Malta.