

*Preventing corruption and promoting integrity
at the sub-national level*

SLOVAK REPUBLIC

including Bratislava and Trenčín Self-governing Region



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EVALUATION REPORT



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

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

GRECO'S SIXTH EVALUATION ROUND

Preventing corruption and promoting integrity
at the sub-national level

Adopted by GRECO at its 102nd Plenary Meeting
(Strasbourg, 27 March 2026)

Council of Europe

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I. PREAMBLE

1. The Group of States against Corruption (GRECO) monitors the compliance of its member states with the Council of Europe's anti-corruption instruments. GRECO's monitoring comprises an "evaluation procedure" which is based on country specific responses to a questionnaire and on-site visits, and which is followed up by an impact assessment (referred to as "implementation procedure" for the purposes of the 6th Evaluation Round) which examines the measures taken to implement the recommendations emanating from the country evaluations. A dynamic process of mutual evaluation and peer pressure is applied, combining the expertise of practitioners acting as evaluators and state representatives sitting in plenary.

2. The work carried out by GRECO has led to the adoption of a considerable number of reports that contain a wealth of factual information on European anti-corruption policies and practices. The reports identify achievements and shortcomings in national legislation, regulations, policies, and institutional set-ups, and include recommendations intended to improve the capacity of states to fight corruption and to promote integrity.

3. Membership in GRECO is open, on an equal footing, to Council of Europe member states and non-member states. At present, GRECO is composed of 48 member states¹ including the 46 Council of Europe member states, plus the United States and Kazakhstan. The evaluation and compliance reports adopted by GRECO, as well as other information on GRECO, are available at: www.coe.int/greco.

4. GRECO has decided that the Sixth Evaluation Round will focus on preventing corruption and promoting integrity at the subnational level. Due to the important role that subnational authorities play in national democracies, preventing corruption and promoting integrity at the subnational level is of paramount importance to ensure the quality of governance and accountability of decentralised governments. Bearing in mind each member state's constitutional set-up² and based on a dialogue with the member state concerned, two subnational authorities are identified for evaluation. They include (i) a capital or another major city; (ii) a regional or other subnational authority or a municipality, in particular in respect of countries having only one subnational tier. They are selected, *inter alia*, on the basis of the following criteria: they are mandated to spend public money and/or to manage finances on an executive basis; they are directly elected and/or have a mandate separate from that of central government; and they deliver a broad range of government services to citizens.

¹ Albania, Andorra, Armenia, Austria, Azerbaijan, Belgium, Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Georgia, Germany, Greece, Hungary, Iceland, Ireland, Italy, Kazakhstan, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Republic of Moldova, Monaco, Montenegro, Netherlands, North Macedonia, Norway, Poland, Portugal, Romania, San Marino, Serbia, Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye, Ukraine, United Kingdom, United States of America.

² In this context, the term "constitutional set-up" is to be understood as meaning a country's constitution, practice and specificities.

II. INTRODUCTION AND METHODOLOGY

5. The Slovak Republic joined GRECO in 1999 and has undergone evaluations in five previous rounds covering different topics linked to the prevention of and fight against corruption³. The implementation rates of recommendations in past evaluations are as follows: First Round: 100%; Second Round: 75%; Third Round: 80%; Fourth Round: 50%⁴ and Fifth Round: 14%. The compliance procedure under the Fifth Round is, however, still on-going. Relevant evaluation and compliance reports are available on GRECO's website at <https://www.coe.int/en/web/greco/evaluations/slovakia>.

6. This Sixth Evaluation Round was launched on 1 January 2025⁵. GRECO's monitoring in this round is based on common standards⁶ drawn from Council of Europe instruments, other international relevant reference texts and GRECO's established practice. These apply equally to all members, while taking due account of their specificities. The evaluation focuses on two main areas. Firstly, it aims to obtain a comprehensive understanding of the competences, mechanisms, and responsibilities of national authorities regarding the promotion of integrity and prevention of corruption at the subnational level, where applicable. Secondly, the evaluation aims at providing an in-depth analysis of the existing legislation, regulations, procedures, bodies, and mechanisms, as applicable, addressing the promotion of integrity and prevention of corruption in the two subnational authorities identified for the evaluation. The two subnational authorities selected are the Bratislava Capital City and the Self-governing Region of Trenčín (Trenčín region).

7. Bratislava and the Trenčín region volunteered to participate in this exercise. As representatives of the Slovak Republic's two levels of subnational administration, they are useful case studies for examining the practical application of national laws and integrity frameworks at the sub-national level. GRECO sees volunteering for evaluation in its Sixth Evaluation Round as a testimony to the strong support for and commitment to anticorruption and integrity demonstrated by the authorities of Bratislava and the Trenčín region, as well as their aspiration to lead by example and their willingness to pursue further improvement.

8. The objective of this report is to evaluate the effectiveness of the measures adopted by the authorities of the Slovak Republic, including Bratislava Capital City and the Trenčín region, to prevent corruption and promote integrity at the sub-national level. All GRECO members are evaluated on the basis of common standards and expectations, while due account is taken of the specificities of each member. The report contains a critical overview of the situation, reflecting on the efforts made by the actors concerned and the results achieved. It identifies possible shortcomings, makes recommendations for improvement and brings positive achievements and

³ Evaluation round I: Independence, specialisation and means available to national bodies engaged in the prevention and fight against corruption / Extent and scope of immunities; Evaluation round II: Identification, seizure and confiscation of corruption proceeds / Public administration and corruption / Prevention of legal persons being used as shields for corruption / Tax and financial legislation to counter corruption / Links between corruption, organised crime and money laundering; Evaluation round III: Criminalisation of corruption / Transparency of party funding; Evaluation round IV: Prevention of corruption in respect of members of parliament, judges and prosecutors; Evaluation round V: Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies.

⁴ These figures provide a snapshot of the situation regarding the implementation of GRECO's recommendations at the time of formal closure of the compliance procedures.

⁵ More information on the methodology is contained in the Evaluation Questionnaire which is available on GRECO's [website](#).

⁶ See the list of [reference texts](#) relevant to the Sixth Evaluation Round.

practices to light. The Appendix to this report contains a comprehensive stocktaking exercise covering the legislative framework, institutional arrangements and implementation practices for all topics under evaluation in this round.

9. The recommendations are tailored to the specific situations identified and are addressed: (i) where relevant, to the national authorities; (ii) specifically to the sub-national authorities undergoing evaluation. In keeping with the practice of GRECO, it is for each of these authorities to determine the institutions/bodies responsible for taking the requisite action. The Slovak Republic has no more than 18 months following the adoption of this report, to report back on the action taken in response to recommendations. Where appropriate, this report also highlights good practices.

10. This report is based on replies to the Sixth Round Evaluation [Questionnaire](#), information collected during an on-site visit, and additional information submitted by the Slovak authorities upon request.

11. A GRECO evaluation team (hereafter referred to as the “GET”) conducted an on-site visit to Bratislava Capital City and the Self-governing Region of Trenčín in the Slovak Republic from 19 to 23 May 2025. The GET was composed of Alexandru CLADCO, Prosecutor in the Legal Assistance and International Cooperation Unit of the General Prosecutor's Office (Republic of Moldova); Vladimir GEORGIEV, former Commissioner, State Commission for Prevention of Corruption (North Macedonia); Leonie HERES, Endowed professor of Integrity of Local Government at the Erasmus University of Rotterdam and associate professor of Governance at the Vrije Universiteit of Amsterdam (Netherlands); and Helena KLIMA LIŠUCHOVÁ, Head of Office for International and EU Cooperation, Ministry of Justice (Czech Republic). The GET was supported by Sophie MEUDAL-LEENDERS and David DOLIDZE from GRECO’s Secretariat.

12. The GET held talks with representatives of the National Council, the Office of the Government, the Ministry of Justice, the Ministry of the Interior, the Ministry of Finance, the Supreme Audit Office, the Public Procurement Office, the Government Audit Office and the Public Defender of Rights. Meetings were also organised with members of the executive and representative bodies of Bratislava and the Trenčín region, representatives of their administrations, companies and audit institutions. In addition, the GET met with members of the police, judges, prosecutors, civil society organisations, journalists, academics and local government associations. The GET wishes to put on record the good cooperation demonstrated by the national authorities, as well as the authorities of Bratislava and the Trenčín region in welcoming the evaluation and providing the necessary information prior, during and after the evaluation visit.

III. FINDINGS AND RECOMMENDATIONS

13. This chapter provides an analytical review of the issues that raised concerns with respect to the Slovak Republic and, more specifically, the sub-national authorities under evaluation, and which the GET considers relevant. It highlights both the gaps that have led to recommendations to the authorities and the good practices (presented in boxes) identified within the current integrity framework and the existing measures at the national and sub-national levels. The Appendix provides detailed descriptive background information that supports and complements the main findings. It also contains other issues which were reported by the authorities but were not considered to require specific recommendations in respect of the Slovak Republic.

Governance structure

14. The Slovak Republic is a unitary state with a population of 5,419,451 inhabitants as of 31 December 2024. It has two tiers of local government, consisting of 2,927 municipalities (including city districts of Bratislava and Košice), and 8 self-governing regions.

15. The main bodies of a municipality are the municipal council and the mayor, both elected by residents for a renewable four-year mandate. The mayor is assisted by one to three deputies whom s/he appoints from among municipal councillors. The mayor is also the head of the municipal administration, which is responsible for the day-to-day functioning of the municipality.

16. The executive body of a self-governing region is its president, and its representative body is the regional parliament, both elected by the residents for a renewable four-year mandate. The president is assisted by one or several deputy presidents, elected by the regional parliament from among its members upon the president's proposal. The president heads the regional administration. The office of the Trenčín region manages the administrative and organisational affairs of the president, the regional parliament and other bodies set up by the parliament.

17. The GET welcomes that two of the three deputy mayors of Bratislava are women. That said, none of the executive or representative bodies of Bratislava and the Trenčín region require a balanced participation of women and men or set a policy objective towards reaching such a balanced participation in political and public decision making. This concerns both the lists of candidates put forward by political parties and the actual composition of the Bratislava city council and the regional parliament of the Trenčín Region. The GET recalls that the Committee of Ministers' Recommendation Rec(2003)3 on balanced participation of women and men in political and public decision making advocates that the representation of women and men in any decision-making body in political or public life should not fall below 40%. Therefore, the GET encourages the Slovak authorities to consider introducing specific measures to promote a balanced representation of women and men in the executive and representative bodies at the sub-national level.

18. Municipalities and regions have their own budgets. Bratislava is the capital of the Slovak Republic, divided administratively in 17 districts. The Trenčín Self-Governing Region is the second smallest of the country's 8 regions by population, with responsibilities in various fields, including transport, tourism, health care and education, as determined by law.

19. The principle of local self-government is enshrined in the Constitution. The Slovak Republic has ratified the European Charter of Local Self-Government, which is in force. It has not signed or ratified the Additional Protocol to the Charter.

Anti-corruption/integrity policy and risk management

Anti-corruption and integrity framework

20. The Slovak Republic has a well-established anti-corruption legal and policy framework, both at the national level and in the sub-national authorities. The most relevant pieces of legislation are the Constitutional Act on the Protection of Public Interest in the Exercise of Public Officials' Functions (No. 357/2004 Coll., hereafter the "Conflict of Interest Act"), the Act on the Performance of Work in the Public Interest (No. 552/2003 Coll., hereafter the "Work in Public Interest Act"), the Act on the Protection of Whistleblowers of Anti-Social Activity (No. 54/2019 Coll., hereafter the "Whistleblower Protection Act") and the Act on Free Access to Information (No. 211/2000 Coll., hereafter the "Freedom of Information Act"). All are applicable to sub-national authorities, their employees, as well as elected and appointed officials of these authorities.

21. At the national level, the main policy document is the Anti-Corruption Policy of the Slovak Republic for 2019-2023 (Resolution No. 585 of 12 December 2018). A new policy for 2024-2029 was in preparation at the time of the on-site visit, and on 21 January 2026 the Government adopted the National Anti-Corruption Strategy for 2026-2029. In Bratislava, Anti-Corruption Standards were approved by the Bratislava city council on 23 September 2021. They consist of 91 measures, grouped around ten areas of action⁷. The Trenčín region is implementing its own Anti-Corruption Policy, adopted on 22 July 2022. The Policy contains nine objectives, which include, *inter alia*, identifying and managing corruption risks, raising awareness of corruption, and protecting whistleblowers. It is complemented by Directive No. 3/2022 on measures in the field of prevention of corruption, setting out an anti-corruption management system for the Trenčín region Office and its activities.

Good practice – Annual evaluation of the implementation of anti-corruption policy documents

In Bratislava, the implementation of the anti-corruption standards is subject to regular evaluation through annual reports submitted by the mayor to the city council.

In the Trenčín region, article 9.2 of Directive No. 3/2022 on measures in the field of prevention of corruption foresees an annual internal audit of the anti-corruption management system set up by the Directive. This annual audit has been so far carried out by the principal auditor of the TSR. Furthermore, the Directive also foresees the possibility of external audits for this purpose.

Regular evaluation of the measures put in place by anti-corruption policy documents is an important feature of a well-functioning integrity system. It enables to take into account in a timely manner any weaknesses and emerging new challenges identified.

⁷ The areas of action are as follows: policy on public information on local government decision-making; transparent budgeting and public information on the budget; procurement and contract publication policy; policy for the disposal of city property; decision-making on the allocation of funds; employment policy and ethics; urban planning policy; policy for the allocation of flats and places in social facilities founded by the city; transparency policy in legal entities established and founded by the city and in companies in which the city has a majority shareholding; city media policy.

22. The GET sees room for improvement in the coordination between the national and the sub-national levels in the preparation and the implementation of anti-corruption strategic documents. The national anti-corruption strategy is binding for central state administration bodies, but only advisory for sub-national authorities. These authorities are namely addressees of the policy, but they have no immediate responsibility in implementing its tasks. Representatives of Bratislava and the Trenčín region met by the GET confirmed that they had not carried out any specific activity to implement the national Anti-Corruption Policy for 2019-2023. At the time of the on-site visit, they had not – yet – either been consulted or invited to contribute to the preparation of the new policy for 2024-2029. Representatives of the national authorities stated that the upcoming consultation procedures would enable sub-national authorities to contribute to the draft policy should they so wish. However, several other interlocutors pointed out that current procedures were not geared towards a regular and meaningful participation of representatives of sub-national authorities in the preparation of national anti-corruption policy documents and that a coherent, strategic approach was lacking in that regard.

23. Improvements in the involvement of sub-national authorities in the preparation of national anti-corruption documents, as well as exchanges of information on anti-corruption policies being developed at the sub-national level, would be coherent with the Slovak [Government Manifesto for 2023-2027](#), which intends to strengthen cooperation with local authorities in implementing anti-corruption rules at the local government level. A possible forum for such exchanges could be the Council of Anti-Corruption Coordinators, set up on 2 May 2023. It is an advisory body to the Office of the Government – which holds primary responsibility for coordinating the prevention of corruption at national level. The Council brings together all anti-corruption coordinators across public administration at central level to share information on anti-corruption activities. Sub-national authorities are not represented as such in the Council's meetings. However, the anti-corruption coordinator of the Association of Towns and Municipalities of Slovakia (ATMS) is a member of the Council. The GET is convinced that an improved representation of sub-national authorities of all levels in the Council would allow for an increased consistency of their respective anti-corruption policies with the national anti-corruption strategy, while adapting it to their specific needs, and for good practices being implemented at either level to be disseminated more easily.

24. In view of the above, **GRECO recommends that the national authorities improve coordination between national and sub-national levels in the preparation and the implementation of national anti-corruption policy documents, with a view to allowing sub-national authorities to provide meaningful contributions within their respective areas of responsibility.**

Risk management

25. The GET notes that risk-management systems are recognised in the Trenčín region and in several Bratislava-controlled public companies⁸ as a tool for identifying vulnerable areas and reducing corruption risks. Notwithstanding the good practices highlighted below, the GET notes that corruption risk assessments are not carried out on a regular basis by Bratislava or the Trenčín region. According to the information gathered by the GET in Bratislava, anti-corruption risk areas are mainly determined by the political programmes of candidates and parties and are sometimes also identified

⁸ Municipal controlled companies are required to publish all contracts, invoices, and orders on their websites. In addition, according to the Act on Accounting (No. 431/2002 Coll.), companies falling under this Act must publish annual reports on the economic development of the organisation. The Slovak authorities indicate that, in practice, such reports are also published by municipal companies not required to do so by law.

through media reports. The findings of annual reports on the implementation of the anti-corruption standards, identified above as a good practice, do not appear to serve as a basis for corruption risk assessments, or for identifying remedies to such risks, including in areas such as public procurement, pointed out as corruption-prone by all interlocutors met in Bratislava.

26. In the Trenčín region, as explained above, an assessment of corruption risks took place in 2022 in the process of obtaining an ISO 37001 certification for Directive No. 3/2022 on measures in the field of prevention of corruption and Directive No. 4/2022 on the internal system for receiving, verifying and registering notifications of corrupt behaviour. However, since the adoption of the two directives, no further assessments of risks with regard to corruption and integrity have been conducted in the Trenčín region. During the visit, representatives of the Trenčín region stated their intention to renew certification in the near future. This would lead to conducting or updating relevant risk assessments, which would certainly be welcome.

Good practice – ISO 37001 certification

ISO 37001 is an international standard for the establishment, implementation, operation, maintenance, and continual improvement of anti-bribery management systems. It provides organisations with a framework to prevent, detect, and respond to bribery risks.

In the Trenčín region, directives setting out an anti-corruption policy and a misconduct reporting policy obtained the ISO 37001 standard in 2022. A risk management exercise was carried out as part of the certification process.

Bratislava Waterworks Company and the Waste Collection and Disposal joint stock Company, controlled by Bratislava, implement an ISO 37001-certified anti-corruption policy. It includes a risk management system, regular training of employees, control over the receipt of gifts, a code of ethics and an ethics commission to handle reports of breaches of the code. The policy applies to all employees and external collaborators and is updated on a regular basis.

The ISO 37001 certification is regarded as a good practice, demonstrating that an organisation has implemented effective policies and controls to prevent corruption and promote integrity.

27. The GET sees much value in conducting regular analysis to identify areas and sectors most prone to corruption risks at the sub-national level. According to the GET's interlocutors, these include public procurement, property management, construction permits, municipally owned companies and recruitment of public employees. Regular risk assessments in these key problematic areas will allow tailoring respective anti-corruption policies to better respond to identified risks and, as a result, deter corruption and enhance transparency more effectively. Therefore, **GRECO recommends the authorities of Bratislava and the Trenčín Self-governing region that (i) analyses of integrity and corruption risks be carried out on a regular basis in relevant areas; and (ii) that remedial measures be included in anti-corruption policy documents to be adopted and implemented.**

28. Furthermore, the GET is of the view that an assessment of corruption risks is particularly important in the context of the administrative division of the Slovak Republic, comprising a large

number of municipalities. Their ability to implement effective anticorruption and integrity strategies may be considerably limited due to the lack of available financial and human resources – a feature that was repeatedly underlined by the GET’s interlocutors – proximity of local government officials with local businesses and inhabitants, especially in smaller municipalities, and a reduced choice of suppliers for public contracts.

Integrity safeguards

29. The GET notes that at present, while there are legal requirements to accede to an office in the executive body of sub-national authorities, no additional integrity safeguards are in place with regard to these functions. During the on-site visit, the GET heard from several interlocutors that introducing additional integrity confirmation measures could have a deterrent effect on potential candidates, bearing in mind that these would have to potentially apply in nearly 3,000 entities. Nonetheless, the proximity of local officials – and of their advisers – to their constituents, businesses and service providers may inevitably lead to risks of conflicts of interest, unless they are identified and managed. The GET sees merit in putting in place additional integrity safeguards for elected and politically appointed officials in the executive bodies of subnational authorities to identify and create awareness of potential areas of risk (e.g. in their network relations) and allow for mitigating measures before risks materialise. Therefore, **GRECO recommends that the national authorities consider introducing integrity safeguards for mayors and presidents of self-governing regions, as well as for their deputies and advisers, upon taking office, in order to identify and manage potential conflicts of interest.**

30. In contrast to the absence of additional integrity safeguards highlighted above, the GET commends the good practices developed by Bratislava in the recruitment of employees in managerial positions in the city and the municipal companies it owns or controls, and by the Trenčín region in the recruitment of public employees.

Good practice – Transparency and integrity safeguards in the recruitment of employees in Bratislava and the Trenčín region

Bratislava has developed an internal regulation on employees' recruitment procedures, in collaboration with Transparency International Slovakia. The regulation foresees different processes for internal, external and managerial recruitments, with a structured assessment of candidates and selection committees, to which representatives of Transparency International Slovakia (occasionally) participate.

Another regulation applies to the selection of managers and board members of all companies, organisations and entities in which Bratislava has majority ownership or control, ensuring that all such appointments follow transparent and integrity-based procedures. Vacancies, CVs of shortlisted candidates and minutes of the selection procedures are published on the city's website. The public may comment on candidates' CVs and provide information on potential risks or erroneous information. For senior positions, hearings include a public part where candidates present their vision and answer questions from both the selection panel and the public. All steps of the process – including shortlisting, interviews and final recommendations – are documented, and results are made public before the city council's approval of the appointment.

Moreover, all shortlisted candidates undergo an integrity assessment (verifying the absence of proven acts against public interest, corruption or ties to groups misusing public funds) in addition to the assessment of their competence, relying on data from candidates' CV and integrity questionnaires, references they provide and publicly available information.

The Trenčín region is implementing procedures for recruiting public employees through publishing announcements for various vacant positions, including managerial. The selection procedure includes a description of the vacant position, qualification requirements, employee requirements, salary information, contact details and application deadline. Candidates undergo both written and oral examinations. In addition, minutes from selection procedures are also published on the Trenčín region website and indicate the composition of multidisciplinary selection committees, the course of the selection procedure and the ranking of candidates recommended for recruitment. These transparent and publicly accountable recruitment processes constitute good practices to ensure the appointment of managers with professional competence, integrity and independence.

Standards of conduct and ethics

31. The GET notes that the [Bratislava](#) city council, as well as the mayor and his deputies, have no code of ethics currently in force. A code of ethics was in place during an earlier legislature of the city council back in 2014, and it was also applicable to the mayor, the chief architect and the chief controller. However, subsequent legislatures did not endorse this code, and it has therefore not been applicable to elected officials during these legislatures. During the on-site visit, the GET was informed that a code of ethics for elected officials of Bratislava was in preparation, with a planned adoption by the next legislature of the city council, to be elected in 2026.

32. As regards employees of Bratislava, there is a [Code of Ethics for employees](#), adopted by order of the mayor, which has been in force since 15 October 2024. It applies to all employees and sets out rules with regard to *inter alia* the prevention of conflicts of interest, as well as gifts and other

advantages. Reports on possible violations of the Code are to be submitted to an ethics commissioner, the function of which the GET sees as a good practice (see below). In addition, the director of the municipality, director of the mayor's office/city police chief and, to a lesser extent, senior staff members, depending on the organisational unit of the city where employees work have a role in examining irregularities or breaches related to asset declarations.

33. In the Trenčín region, a [Code of Ethics for Elected Representatives of the Region](#), adopted by the regional parliament on 27 March 2023 is in effect and applies to the president of the Trenčín region, members of the regional parliament and the principal auditor. It consists of ten articles covering, *inter alia*, provisions on conflicts of interest, gifts, relations with the public and reporting obligations.

34. Employees of the region are subject to the Code of Ethics for Employees of the Trenčín region, which has been in force since 29 October 2021 and forms an integral part of the work regulations. It contains a series of principles dealing, *inter alia*, with conflicts of interests, gifts and other benefits, confidential information, relations with the public, social media etc. Violation of its provisions may lead to a breach of work discipline, which may be grounds for termination of employment under the provisions of the Labour Code. The Trenčín region as employer is responsible for compliance with the Code's provisions.

Good practices – Involvement of stakeholders in the preparation of codes of ethics and supporting measures for their implementation

In the Trenčín region, both the code of ethics for elected representatives and the code of ethics for employees were developed with the direct participation of representatives of its addressees. This participatory approach is considered a good practice, as it helps raise awareness on integrity issues and fosters a sense of ownership among those expected to follow the codes.

In Bratislava, an ethics commissioner has been appointed by the mayor from among the staff of the city hall for a two-year renewable term. The ethics commissioner has both an advisory and a supervisory role in the implementation of the code of ethics. The office organises awareness-raising activities, provides confidential advice and may receive reports on suspected breaches of the code – two such reports were received between 1 April 2021 and 30 September 2024. Established breaches may lead to corrective action, including disciplinary measures, based on recommendations of the ethics commissioner.

The establishment of the ethics commissioner represents a positive step towards embedding integrity principles in daily municipal practice. It contributes to making the code of ethics a living, operational and enforceable instrument to strengthen ethics and integrity. This arrangement, however, would benefit from further reflection to ensure clear separation of advisory and oversight functions and to reinforce trust in the impartiality of the applicable integrity framework.

35. As regards supervisory arrangements for the Code of Ethics for Elected Representatives of the Trenčín region, the regional parliament's commission for the protection of public interest is responsible for compliance with the Code and examines possible breaches. However, apart from a

resolution establishing/confirming that a breach has occurred and that the official in question is to be held accountable, no specific sanctions or measures are envisaged, as the Code is only of a declaratory nature. The GET is of the view that the enforcement mechanism of this Code merits further strengthening, as currently it appears to be limited to reputational/political consequences.

36. The GET notes that in the past five years no records or reports were registered concerning violations of the provisions of either code in force in the Trenčín region. The GET finds it difficult to explain the absence of reports of suspected violations of these codes in a relatively large organisation. Observations offered by local interlocutors on this issue mainly referred to the underdeveloped custom of reporting wrongdoings in smaller communities. This issue will be dealt with below in the section of this report dealing with whistleblower protection.

37. In view of the above, **GRECO recommends the authorities of Bratislava and the Trenčín Self-governing Region (i) that a code of ethics/conduct be adopted for members of the Bratislava city council, the mayor and his/her deputies covering all relevant integrity matters (e.g. conflicts of interest, gifts, contacts with lobbyists and other third parties, ancillary activities, handling of confidential information, asset declarations and post-employment restrictions) and made public; (ii) that this code and the Code of Ethics for Elected Representatives of the Trenčín Self-governing Region be complemented with practical guidance, including examples arising from day-to-day activities, and (iii) that both codes be coupled with a credible supervision and enforcement mechanism, including specific and effective sanctions/measures for violations.** It should be ensured that the codes of ethics/conduct remain applicable irrespective of changes in the legislature following elections.

38. The GET notes that training on anti-corruption and integrity is not systematically provided to the members of the executive and representative bodies of Bratislava and the Trenčín region (mayor, president of the region, members of city councils or regional parliaments), nor is any confidential advice mechanism currently available to them.

39. In Bratislava, the GET recalls that the city council and the mayor and his/her deputies have no code of conduct in force. There are no institutional or practical arrangements for these officials to approach the ethics commissioner for confidential advice on integrity matters either. Some members of the city council indicated to the GET that, on several occasions, they contacted Transparency International Slovakia (TI) for advice on ethics and integrity, owing to the good cooperation established between Bratislava and TI and the fact that they previously had taken part in activities on ethics and integrity organised by TI. While cooperation with civil society organisation in matters of ethics and integrity is certainly welcome, it cannot serve as a substitute – and actually illustrates – the lack of official counselling channels to be established by the municipality.

40. In the Trenčín region, interlocutors met on-site indicated that it was possible for the members of the regional parliament to consult lawyers in the legal department of the regional administration for advice on the provisions of the Code of Ethics for Elected Representatives. However, this possibility is not formalised, and no statistical information or concrete examples of such requests could be provided.

41. The GET is convinced that these are gaps that need to be remedied. In Bratislava, the Ethics Commissioner could certainly have a role in these mechanisms and functions, provided the setup takes into account the need for separation of its advisory and supervisory functions, and sufficient resources are allocated (see the recommendation in paragraph 44 below). Consequently, **GRECO**

recommends that the authorities of Bratislava and the Trenčín Self-governing Region, for elected/appointed officials in the executive and representative bodies, (i) develop mechanisms to raise awareness on integrity matters and the (future) code of ethics, including through integrity training at the start of their term and on a regular basis throughout their term in office; (ii) establish a dedicated confidential counselling function to provide advice on integrity, conflicts of interest and corruption prevention.

42. Turning to public employees, the GET notes that in Bratislava, since 1 November 2024, information about the Code of Ethics for Employees is being provided by the ethics commissioner to new recruits as part of their onboarding, and refresher training is organised each time the Code of Ethics is amended. Some *ad hoc* training activities on selected topics are occasionally conducted by external experts, and a full-day in-person training session on the prevention of corruption took place on 25 September 2025.⁹ A shorter, two-hour training will be offered for most senior officials (Mayor, Deputy Mayors, Head of the Mayor's Office, City Manager and the deputies) during January/February 2026. Finally, for the same period, a webinar will be prepared in cooperation with the "Stop Corruption Foundation" for all employees of the municipality on the topic of corruption, conflicts of interest, etc.¹⁰ These activities are certainly welcome. The GET encourages the authorities to develop them further, focusing on aspects beyond general awareness of the Code of Conduct towards skills development (e.g. speak-up, moral recognition and judgment) and behavioural support (e.g. everyday practices and routines). A future training curriculum could usefully cover fundamental aspects of anticorruption and integrity (e.g. recognising and managing conflicts of interest, rules on gifts, incompatibilities with ancillary activities, post-employment restrictions, etc.) in a more systematic manner, to supplement the ad-hoc demand-driven training for specific functions or topics. At the same time, appropriate adaptations should be made to the training needs of employees in junior, mid-level and managerial positions.

43. The GET also welcomes that public employees of Bratislava may address the ethics commissioner, who is in charge of interpreting the Code of Conduct for Employees, for consultation and advice on integrity issues¹¹. Such requests and consultations received are confidential. However, the GET notes that the ethics commissioner is also closely involved in investigating reports on possible violations of the Code and issues opinions that are to be followed by other competent bodies/officials in charge of determining sanctions for established violations. While access to confidential advice on integrity is a positive feature *per se*, the GET is concerned that this function is difficult to reconcile with the ethics commissioner's responsibilities in ensuring compliance with the Code of Conduct, as public employees may be reluctant to seek advice from the authority which

⁹ Titled "How Not to Sink in Rough Waters: Ethical and Anti-Corruption Navigation in City Administration", it was delivered by a trainer from the "Stop Corruption Foundation" and aimed at providing guidance on how to perform public functions under pressure in corruption-risk situations and on ethical dilemmas. The session was designed for middle and senior management and gathered 15 participants, primarily section directors.

¹⁰ In January 2026, a workshop entitled "How to Work with One's Own Power" was conducted in cooperation with the "Stop Corruption Foundation". The workshop was designed for individuals in leadership positions who seek to exercise influence in a fair and responsible manner—not only towards their colleagues but also towards themselves—and who are interested in fostering a fair working environment within their organisations and in society at large. It was primarily intended for the deputy mayors, the Director of the Mayor's Office, the Director of the City Administration, and his deputies. The participants of the workshop mapped their own influence and privileges, thereby strengthening the potential for fair and meaningful use of power. Further, a webinar for all employees is planned for February 2026 to provide basic guidance for navigating ethically challenging situations in the workplace, such as situations involving conflicts between various roles of employees.

¹¹ The ethics commissioner can be contacted through a dedicated e-mail address etika@bratislava.sk, by telephone or through the mailbox located in the municipal building.

may conclude that they are in violation of the Code. This could create potential conflicts among the commissioner's competences for instance, when a case in which advice was given is subsequently reported and needs to be investigated. It could also negatively affect employee perceptions of the safety of reporting and of the confidentiality of advice being given. For the confidential advice on ethics and integrity to be more accessible, this chilling effect needs to be remedied. Finally, the ethics commissioner works only on a part-time basis and exercises other functions on behalf of the city. In view of the recommendation and encouragement given above to further develop training, awareness and advice activities, this setup appears insufficient to the GET. Therefore, **GRECO recommends the authorities of Bratislava that, (i) the function of confidential advice on ethics and integrity matters be separated from the function of supervising compliance with the Code of Conduct for Employees; (ii) the body/authority entrusted with confidential counselling on ethics and integrity be provided with sufficient (human, financial and administrative) resources to perform its tasks.**

44. In the Trenčín region, awareness-raising activities for public employees were organised in 2022 in connection with the adoption of the two directives on the anti-corruption policy and reporting possible corrupt behaviour. During the on-site visit, the GET was informed that all public employees of the Trenčín region, as well as those in companies¹² and subordinate organisations of the region, are required to be familiar with the two directives. Further online training regarding the provisions and the implementation of these directives was conducted for staff of the Chief Auditor's Office and employees of the Trenčín region in September and October 2025, but no elected officials of the Trenčín region took part in it. As regards confidential counselling, no dedicated mechanism is available to employees.

45. While welcoming the awareness-raising measures already implemented, the GET sees a clear need to strengthen them and make them more systematic. Ethical dilemmas which public employees may face in the performance of their duties will be difficult to resolve in a coherent manner unless an institutional effort is made towards providing them with guidance and encouraging them to address their integrity questions through dedicated counselling. It is therefore of crucial importance that induction trainings provided for all newly recruited public employees of the Trenčín region focus on integrity, ethics and anti-corruption, and that guidance and risk-mitigation tools are made available. In addition, regular awareness raising efforts should be supported by a confidential counselling function, provided by a body/office with no other potentially conflicting tasks. Therefore, **GRECO recommends the authorities of the Trenčín Self-governing Region that (i) induction and regular in-service training on ethics and integrity provided to public employees be further strengthened; and (ii) a dedicated confidential counselling function be made available for interpreting and implementing these standards, and that public employees be duly informed of such a possibility.**

Conflicts of interest prevention

Secondary/outside activities

¹² The GET was informed after the visit that as of the summer 2025, the Trenčín region acquired 35 % of the shares of the Integrated Transport of the Žilina and Trenčín Regions, Ltd. This company does not have a certified anti-corruption policy, although it has implemented anti-corruption measures within its Code of Ethics for employees. Publicly available information regarding this company includes its members, statutory bodies, reports from general meetings and financial statements. One of the members of its supervisory board is a member of the Trenčín region Council, appointed to represent the interests of the region.

46. Some restrictions on outside activities are foreseen in national legislation. For members of the executive bodies of sub-national authorities, the Conflict of Interest Act prohibits membership in statutory, management or supervisory bodies of entities conducting business activities, but certain exceptions apply to some elected officials in Bratislava and the Trenčín region. Members of Bratislava city council and of the Trenčín region regional parliament are not subject to restrictions on outside activities.¹³ As for public employees, the Work in Public Interest Act and the Labour Code foresee that an employee may engage in another gainful employment, subject to prior written consent of the public employer, and if such parallel activity is not performed during the working hours in public administration. However, the GET learned during the on-site visit that no register or other records were kept in this regard in Bratislava or the Trenčín region. According to some of its interlocutors, seeking employer's approval for engaging in an outside activity was conceived as "of common sense" and such requests were dealt with as a routine procedure, not requiring any recording and follow-up.

47. The GET is of the view that the regime of outside activities applicable to officials and employees in subnational authorities needs further streamlining and strengthening. While general restrictions of outside activities are provided by national legislation, the exceptions appear to be broad and regulated by different pieces of legislation. This regulatory framework makes it difficult to have an overview of the applicable rules, including for the public officeholders expected to comply with it. Moreover, the lack of consistent implementation and supervision of compliance could be a wide-open door for possible conflicts of interest. The GET believes that the rules regarding outside activities, as well as the compliance supervision, merit review in order to provide, on the one hand, greater clarity with regard to restrictions in place, exceptions, and their application, and, on the other hand, to the implementation of these rules, which should be strengthened by keeping records of requests granted, and spelling out measures for breaches. Therefore, **GRECO recommends to the national authorities that (i) a study be undertaken on the current regulatory framework and practices regarding the exercise of (paid and unpaid) outside activities by elected/appointed officials and employees of subnational authorities; (ii) and that, in the light of the findings of this study, the national regulatory framework be adequately developed/adapted to limit integrity-related risks and effectively supervise the exercise of outside activities.** The scope of this study should include, *inter alia*, the involvement of employees and elected officials in municipally owned companies.

Post-employment restrictions

48. The GET notes that the mayor of Bratislava and the president of the Trenčín region are subject to a one year "cooling-off" period prior to taking up employment or entering into a contractual agreement with any natural or legal person to whom they granted any benefit, subsidy, public tender or any other decision releasing such persons from their obligations under the law, for the last two years prior to the end of their term of office. This restriction may be lifted by the competent commission for the protection of public interest (of the city council or regional parliament) if it is considered "disproportionate in a given situation". The GET further notes that no post-employment restrictions or safeguards are currently in place with respect to members of Bratislava City council and the regional parliament of the Trenčín region.

¹³ The Slovak authorities indicate that members of the supervisory boards of municipally controlled companies may often be politicians from among the city councillors. No systematic approach is currently in place to address any possible conflict of interest in these cases.

49. No post-employment restrictions are in place either for public employees of Bratislava or the Trenčín region. In the course of the on-site visit, the GET heard that the Labour Code provides for the possibility to insert a “non-compete” clause in employment contracts, prohibiting an employee from engaging in a paid competing activity once public employment is terminated. However, due to the need to provide adequate financial compensation to the employee, this possibility appears not be used in practice.

50. Views on post-employment restrictions shared by interlocutors during the on-site visit left the GET with the firm impression that conflicts of interest risks inherent to “revolving doors” are not sufficiently recognised in Bratislava and the Trenčín region, bearing in mind the scope of competences of executive and, to some extent, of representative bodies at the local level, and the decision-making power of the officials concerned. Employees in managerial positions may also be vulnerable to such conflicts in the context of promises or agreements for future employment in the private sector. These risks are further exacerbated by the absence of any rules with regard to the transparency of contacts with lobbyists and third parties aiming to influence public decision-making (see below). The GET is convinced that these issues need to be addressed. Possible measures could include certain safeguards when seeking new employment while in office, a cooling-off period (similar to the one already existing for the mayor of Bratislava and the president of the Trenčín region) before a new position may be taken up, restrictions on certain types of activities or a prior approval or advice in respect of new activities following public service.

51. In view of the above, **GRECO recommends the national authorities that the legislation and practice governing post-employment rules with respect to officials and employees of subnational authorities in high-risk positions be subject to a substantive review as regards the risks of conflicts of interest and that adequate measures be implemented to mitigate any risks identified.**

Gifts

52. Politically elected officials in subnational authorities must not solicit, accept, induce another to give gifts or other benefits in connection with the performance of their duties (Article 4 paragraph 2 (b), Conflict of Interest Act). An exception are gifts usually offered in the performance of a public function, or gifts given on the basis of a law. The GET notes, however, that no definition is provided for gifts that would be considered acceptable in the performance of official functions. Public officials also have to include in their annual declarations of assets, interest and liabilities, any gifts or benefits received during a calendar year if the value of a single gift, or the total value of gifts from one donor, exceeds 10 times the minimum wage¹⁴ (€8,160 in 2025) (Article 7(1)(f) of the Conflict of Interest Act). The GET recalls in this regard GRECO’s concern expressed in its 5th Round Evaluation Report and subsequent compliance reports on the Slovak Republic with regard to this threshold being far too high.

53. In Bratislava, there is no register of gifts or donations received by politically elected officials and no statistics are kept in this regard. In the Trenčín region, Article IV of the Code of Ethics for Elected Representatives replicates the legal prohibition to solicit or accept gifts or other benefits in connection with the performance of their duties. The GET notes that this rule only applies to gifts and benefits above 20% of the minimum wage (€163 in 2025). Any gifts or benefits accepted must be reported to the person responsible for anti-corruption policy who keeps a non-public register of

¹⁴ According to the Eurostat 2025 data for minimum wages, in the Slovak Republic the minimum wage in January 2025 was €816. More information is accessible via the following link: <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20250410-2>

gifts. The provisions of the Conflict of Interest Act prohibiting the acceptance and solicitation of gifts and other benefits and specifying declaration thresholds for such gifts and benefits also apply to the President of the Trenčín region, as an elected representative.

54. Furthermore, the GET notes that public employees of Bratislava are prohibited from accepting or soliciting gifts or any other benefit for themselves or persons related to them, if this could influence their decision-making and professional attitude, real or perceived, or if the benefit may be regarded as remuneration for the performance of their duties (Chapter 2.3 of the Code of Ethics for Employees). Exceptions to this rule include gifts and work-related hospitality of up to €30 in value, as long as they do not influence the employee's decision or appear as a reward, and for protocol or "socially acceptable" gifts. The non-public register of gifts received by public employees is kept by the ethics commissioner. In the Trenčín region, the register of gifts received by elected representatives and those received by public employees is maintained by the person responsible for anti-corruption policy. Gifts received by the employees of the Office of the President are managed by the person responsible for the Trenčín region anti-corruption policy.

55. During the on-site visit, the GET heard from representatives of sub-national authorities and the academia that the rules on gifts required further clarity to be applied more consistently in practice. The estimation of gifts' value was often left to the persons receiving them, who, in case of doubt, could approach the bodies responsible for supervising compliance with codes of ethics (ethics commissioner) or with declarations of assets, interests and liabilities (chief controller). Interlocutors also expressed the view that the disclosure of gifts received was largely left to the good conscience of members of representative bodies, adding that reports or suspicions of undeclared gifts would be examined by the relevant commissions for the protection of public interest (city council or regional parliament). However, this has not occurred in practice.

56. In view of the above, **GRECO recommends that the authorities of Bratislava and the Trenčín Self-governing Region establish, with regard to elected officials in the executive and representative bodies, more stringent rules on gifts and other benefits by (i) lowering significantly the thresholds for accepting, declaring and recording gifts, with a fixed monetary value; (ii) providing appropriate practical guidance on the valuation, acceptance and refusal of gifts and benefits offered; and (iii) making gifts registers accessible to the public.**

57. As to the public employees in Bratislava and the Trenčín region, the GET believes that the existing principle of non-acceptance of gifts and other benefits, as well as the detailed rules for gifts that may be accepted, could be usefully supplemented by appropriate practical guidance on the obligation of reporting gifts, reporting lines and authoritative counselling sources for valuation and could also be incorporated among the topics to be addressed in training on ethics and integrity.

Declaration of assets, liabilities and interests and verification mechanisms

58. Declarations of assets, liabilities and interests of mayors and presidents of regions are submitted to the national parliament's committee on incompatibility of functions, which is also in charge of examining possible cases of conflicts of interest. The GET recalls that in its two previous evaluation rounds dealing with parliamentarians and persons in top executive functions, GRECO had noted the insufficient human and financial resources allocated to this committee and had pointed out that its verification was limited to formal checks. The recommendations issued by GRECO in this regard have not been implemented to date.

59. Interviews held on-site confirmed the picture drawn in the two previous rounds. The review by the committee is limited to verifying the timely submission and completeness of the information provided and does not focus on the accuracy of the declarations' content nor on assessing the actual value of property or assets declared. The committee currently has four staff members, and a large number of declarations to check annually (2,100 declarations for 2024). The GET also heard that the political attachment of the members of the committee – its 15 members being parliamentarians representing political parties – carried the risk of making the committee's decisions vulnerable to political influence, to the detriment of an effective and impartial monitoring and sanctioning of infringements. Violations of declaratory obligations may lead to sanctions (e.g. imposition of fines), which are decided by the committee by a simple majority, except when deciding to discontinue proceedings, which requires a three-fifths majority. While the committee's meetings are not public, its decisions are published on the parliament's website and may be appealed with the Constitutional Court. The GET notes that since October 2024, three proceedings were initiated by the committee with respect to mayors. Overall, from 2020 to 2025, the parliamentary committee initiated 81 proceedings against mayors in the Slovak Republic, of which in 21 cases it imposed sanctions, 23 proceedings have been discontinued, and in 37 cases it did not adopt resolutions, failing the required three-fifths majority to do so. During the same period, the committee initiated two proceedings with respect to Presidents of Self-Governing Regions, of which one resulted in a sanction, and one has been discontinued.

60. Declarations by members of the Bratislava city council and the regional parliament of the Trenčín region are submitted to these institutions' respective commissions for the protection of public interest in the exercise of public functions (the Bratislava city council commission consists of nine members, the commission of the Trenčín regional parliament – of six members) and are kept by the secretaries of these commissions. Abridged versions of the declarations, aligned with data protection legislation, are made public on Bratislava's and the Trenčín region's respective websites.

61. During the on-site visit, the GET heard similar concerns as those expressed above with regard to the efficiency of the review carried out by the city/regional council commissions for the protection of public interest in Bratislava and the Trenčín region.

62. The Trenčín region commission for the protection of public interest has 44 declarations to check annually. To this end, it is assisted by a lawyer, an accountant and a secretary, who keep track of relevant changes in legislation and regulation at national and regional levels. While systematic submission of declarations was acknowledged by the GET's interlocutors, concerns were expressed that the quality of the information provided is insufficient to establish a factual situation of assets and interests owned. Verifications are limited to checking the name, signature, functions (including outside functions) of the official, and whether the declaration was submitted by the deadline. Verifications do not cover the contents of what is declared or the accuracy of property valuation. While the commission may, in case of considerable discrepancies, initiate proceedings and ask questions to the member concerned, no such cases were reported in practice. Final decisions on any sanctions for violations of declaratory obligations proposed by the committee are taken by a vote of the regional parliament.

63. A comparable picture was presented to the GET in Bratislava. Verifications of declarations submitted to the city council commission are limited to checking formal requirements (name, signature, functions, submission deadline), but no in-depth verification of the accuracy and value of assets/property declared takes place. In addition, it would appear that providing information on deposits, works of art, cryptocurrencies and other valuables is not required in declaration forms.

The commission's resolutions regarding sanctions for breaches are to be approved by the city council. Some of the GET's interlocutors also hinted at a certain politicisation of sanctioning decisions, but acknowledged that it had decreased in recent years, owing to enhanced public scrutiny.

64. Overall, the GET is firmly convinced that the current system of verification of declarations by elected officials of the executive and representative bodies of subnational authorities merits further strengthening. In view of the above, **GRECO recommends to the national authorities that the mechanisms for reviewing declarations of assets submitted by elected officials of subnational authorities be significantly strengthened, notably by giving competent bodies the powers and adequate human and financial resources to carry out substantial verification of the declarations submitted and investigate irregularities.**

65. Public employees in managerial positions of Bratislava and the Trenčín region must declare their assets, but they are not required to declare liabilities (loans, payments due etc.). Declarations are submitted to the registry of the Citizens' Services Department of Bratislava and are transmitted to the ethics commissioner (Bratislava) or the human resources department (Trenčín region), respectively, for possible checks and verifications, without being made public. In the Trenčín region, some 24 employees in management positions are subject to asset declarations under the Public Interest Act, who are to submit them to the Department of Personnel Management, Payroll, and Crisis Management of the Trenčín region. The GET was informed that not all declarations are being verified by these officials, but only those where reasonable doubts of a possible breach exist, or a report has been submitted to that effect.

66. While a risk-based and proportional approach to verifications of declarations by public employees in managerial positions appears adequate to the GET, it wishes to put on record considerable limitations of the ethics commissioner (Bratislava) and the chief controller (Trenčín region) to effectively perform their responsibilities in this area. This is due to the other functions of these bodies, as described in this report, as well as to a lack of human and technical resources to carry out the necessary cross-checks and investigations. The recommendation issued as regards confidential counselling in Bratislava could have a bearing on this issue. More generally, the GET is of the view that the sub-national authorities of the Slovak Republic could usefully facilitate inter-regional and inter-municipal learning by exchanging knowledge, expertise and good practices on their measures implemented to avoid conflicts of interest.

Transparency, access to information and public participation

67. Bratislava and the Trenčín region are bound by the Freedom of Information Act, which is applicable to local and regional authorities and legal persons with decision-making authority over individual rights and obligations. It includes an obligation to publish official information of public interest, such as the budget and management, contracts, invoices and orders¹⁵, public procurement¹⁶, resolutions and decisions¹⁷. In Bratislava, the procedure for disclosure of

¹⁵ All contracts, as well as invoices and orders, are to be published on Bratislava/the Trenčín region websites and in the Central Register of Contracts of the Office of the Government of the Slovak Republic.

¹⁶ All information on public procurement, including announced tenders, results and contracts with contractors, is to be available through electronic systems such as the Central Register of Contracts or on the website of the Public Procurement Office.

¹⁷ Resolutions, draft regulations, results of votes and decisions, as well as minutes of the meetings of the city council/regional parliament.

information is further regulated by the mayor's Directive S17 on disclosure of information. Publication and access requests regarding information held by the Trenčín region are registered and handled by the internal control, complaints and petitions unit of the Trenčín region office.

68. The GET finds it commendable that, as a general principle, information of public interest is to be disclosed *ex officio* at the sub-national level. The strong national rules on transparency and access to information are generally well implemented both in Bratislava and the Trenčín region, through publication of declarations of assets and interests of politically elected/appointed officials of the executive and representative bodies, accessibility of meetings of its representative bodies and publication of draft regulations, policy documents and resolutions to be adopted by them. Some good practices implemented by both sub-national entities even go beyond the national law requirements.

Good practices in public participation and public contracts/procurement procedures

Both Bratislava and the Trenčín region implement transparency measures concerning contracts for public services and public procurement procedures that go beyond the requirements set under national law.

In Trenčín, draft resolutions of the regional parliament are published on the official notice board at least 15 days prior to the meeting in which they are to be discussed (longer than the legally required 10-day period for public consultations on draft regulations), allowing members of the public more time to submit comments.

The Trenčín region has also decided to keep the threshold for contracts subject to public procurement procedures at €10,000 – instead of €50,000, as permitted under the recently amended Public Procurement Act).

In Bratislava, regulations require at least five bidders in public procurement procedures, rather than the minimum of three established by national law.

These measures represent good practices that help enhance transparency, accountability and public trust in decision-making processes at the sub-national level.

69. Notwithstanding the sound general framework on access to information, which was acknowledged by all interlocutors, several examples were given in which, in recent years, access to information had not been provided in a timely manner concerning some large-scale infrastructure projects. A possibility of obtaining information through an appeal before court (after a 15-day administrative review) was recognised, but the length of court proceedings – on average, up to 20 months - often rendered obsolete the information finally obtained by court decision. Furthermore, the number of cases adjudicated by courts on denial of access to information remains low (only 37 cases were finally adjudicated by the Supreme Administrative Court between 1 August 2021 and May 2025).

70. At the time of the evaluation visit, many of the GET's interlocutors expressed concern about amendments to the Freedom of Information Act, adopted by Parliament on 10 December 2024,

extending the time limit for responding to requests for information from 8 to 12 days and introducing a possibility of charging fees for granting certain information requests (e.g. for “exceptionally extensive searches for information”).¹⁸ However, these amendments have been challenged before the Constitutional Court by the Public Defender of Rights (Ombudsman) and a group of parliamentarians. Following a ruling of 5 December 2025 of the Constitutional Court, some of the amendments in question were declared unconstitutional. However, the extension of the time limit for responding to requests from 8 to 12 days remains in place.

71. The GET notes the difficulties observed in practice with regard to access to some information in Bratislava and the Trenčín region. However, these difficulties are not exclusive to the sub-national authorities under review. The GET encourages the authorities of Bratislava and the Trenčín region to continue expanding the already observed good practices regarding publication of information of public interest in their respective fields of competence.

Lobbying and third parties

72. In the Slovak Republic, there are currently no rules at national level regarding lobbying and contacts of elected officials with lobbyists and other third parties. The authorities indicate that a draft law on lobbying is currently in preparation under the competence of Ministry of the Interior. Recommendations were issued by GRECO both in the [Fourth Round](#) and the [Fifth Round](#) Evaluation Reports to regulate the contacts of national MPs and of persons in top executive functions with lobbyists and other third parties and to introduce more transparency on these contacts. For the time being, these recommendations have not been implemented, although the GET recalls that the Fifth Round compliance procedure is still ongoing.

73. At the sub-national level, no rules are currently in place regarding the transparency of contacts of elected officials in the executive and representative bodies of [Bratislava](#) and the [Trenčín region](#) with third parties and other lobbyists. This is a cause for concern. GRECO highlighted in its previous reports in respect of the Slovak Republic that in a country of its size, the likelihood of MPs, ministers or other officials with executive functions being in some way connected with lobbyists or other third parties is undoubtedly higher than in larger countries. This likelihood is even greater at local and regional level, where elected officials and administrations are the first point of contact for citizens and businesses, and take important decisions affecting their daily life and activity.

74. Reference is made to the Committee of Ministers [Recommendation CM/Rec\(2017\)2](#) to member states on the legal regulation of lobbying activities in the context of public decision making, which supports the regulation of lobbying and calls for guidance to be provided to public officials on their relations with lobbyists, in order to avoid risks to public sector integrity that might be created by lobbying activities. Pending the – long overdue – adoption of national legislation, this could be achieved through enforceable rules, the adoption of policies, procedures and guidelines, and awareness raising measures. The [European Code of Conduct for all persons involved in local and regional governance](#) of the Council of Europe’s Congress of Local and Regional Authorities lends support to this approach, by requiring all actors to foster transparency, openness and visibility of their activities.

¹⁸ These amendments raised broad criticism with regard to additional restrictions and obstacles to effective access to public information, pointing, in particular, to the lack of clear definitions, the broad discretion left to officials to interpret the new provisions, and the risk of financial hurdles for accessing critical public information.

75. In light of the above, **GRECO recommends that (i) the national authorities regulate lobbying to ensure transparency of interactions between lobbyists and officials involved in decision-making, including at the subnational level; or (ii) in the absence of such regulation, the authorities of Bratislava and the Trenčín Self-governing Region (1) improve the disclosure of contacts of officials involved in decision-making with lobbyists and other third parties seeking to influence public decision-making, including the identity of the persons met (or whom they represent) and the subject matters discussed, and (2) develop and disseminate guidance for officials on how to engage with lobbyists and third parties in a transparent manner.**

Control mechanisms, oversight and accountability

Disclosure of corruption and integrity violations, whistleblower protection

76. The GET notes a well-developed legal and regulatory framework at the national level, as well as in Bratislava and the Trenčín region,¹⁹ regulating public complaints and notifications of possible violations of criminal law provisions on corruption, legal provisions on conflicts of interest, as well as integrity rules and other related obligations. No significant shortcomings were signalled to the GET in this regard in Bratislava and the Trenčín region. That said, the GET wishes to highlight that on 9 December 2025, the Parliament passed amendments to the Whistleblower Protection Act, which, according to several civil society organisations,²⁰ international institutions²¹ and experts, brings about a number of adverse effects to the legal and practical safeguards that have been in place for the protection of whistleblowers. The GET notes that these amendments have been challenged before the Constitutional Court and subsequently repealed by Parliament on 17 March 2026. Therefore, the Office for the Protection of Whistleblowers, which is largely perceived as an independent body, remains in place.

77. Against the background of this legal and regulatory framework, the GET feels bound to explore a comprehensible explanation to the fact that only one whistleblower's report has been submitted in Bratislava, and none in the Trenčín region. During the on-site visit, the GET heard from representatives of civil society that difficulties of practical application of a well-developed whistleblower protection legislation hinged mainly on the sharply negative public perception of whistleblowing, and on the relatively recent dedicated institutions – in particular, the whistleblower protection office (WPO) with the Public Defender of Rights – which needed to gain trust. These views were mostly confirmed by interlocutors met in Bratislava and the Trenčín region and representatives of the office of the Public Defender of Rights. The latter also submitted that the WPO conducts awareness-raising activities for sub-national authorities with the aim to strengthen whistleblowing and enhance trust in the reliability of the reporting channels available. These activities are certainly welcome and would benefit from further reinforcement at the sub-national level. The Congress's Resolution 444 (2019) and Recommendation 435 (2019), which call on local and regional authorities

¹⁹ In the Trenčín region, channels, institutions, guidance and training on reporting wrongdoings are made available by the Principal Auditor, as well as by the person responsible for anti-corruption policy.

²⁰ See the letter sent to the Slovak Government on 25 November 2025, on behalf of WIN, European Whistleblowing Institute, Stop Corruption Foundation, Transparency International Slovakia, VIA IURIS to the Minister of Justice, Minister of the Interior, Speaker of Parliament of Slovakia, accessible via the following link: <https://whistleblowingnetwork.org/News-Events/News/News-Archive/Slovak-Government-Fast-Tracking-New-Bill-to-Reduce>

²¹ See the statement of the European Public Prosecutor's Office regarding the legislative amendments proposed by the Slovak government on whistle-blower protection, accessible via the following link: <https://www.eppo.europa.eu/en/media/news/statement-regarding-legislative-amendments-proposed-slovak-government-whistle-blower>

to encourage positive attitudes towards whistleblowing among citizens and to organise national whistleblowing campaigns to promote its added value in the fight against corruption, as well as establish appropriate confidential reporting channels, lend further support to this approach.

78. The GET believes that the scant application in practice of the existing legislative and institutional framework for reporting integrity-related violations, misconduct and possible corruption offences is a missed opportunity, as such reports can be a very useful source for addressing breaches effectively, as well as for preventing them. Further practical steps should be taken by the two subnational entities under the evaluation to encourage reporting of wrongdoing and protection of whistleblowers in their respective institutions and bodies. Therefore, **GRECO recommends that Bratislava and the Trenčín Self-governing Region take further measures to (i) raise awareness among their respective elected officials and public employees of channels and institutions for reporting misconduct and corruption offences, as well as whistleblower protection possibilities; and (ii) provide dedicated guidance and training on these matters.**

IV. CONCLUSIONS AND FOLLOW-UP

79. The Slovak Republic has a well-established anti-corruption and integrity system, which extends largely at the sub-national level. Bratislava and the Trenčín Self-Governing Region have gone beyond the national framework and have developed a number of good practices, documented in this report, which highlight their commitment to preventing corruption and promoting integrity. These good practices cover many areas, from the evaluation of the implementation of anti-corruption policy documents, ISO anti-bribery certification, to transparency and integrity screening in the recruitment of employees in managerial positions, the involvement of stakeholders in the preparation of codes of ethics and positive practices in public participation and procurement procedures.

80. The report has identified several areas where further progress is needed and makes recommendations accordingly. These address a range of issues, including the coordination between the national and the sub-national levels in the preparation and implementation of anti-corruption policies, regular analysis of integrity and corruption risks, integrity safeguards for political officials, codes of ethics and their enforcement, awareness-raising and confidential counselling in integrity matters, outside activities, post-employment restrictions, rules on gifts, review of declaration of assets, liabilities and interests, lobbying and whistleblower protection.

81. The implementation of the recommendations is expected to further strengthen the Slovak Republic's integrity system, promote accountability at the sub-national level and foster public trust in institutions. Some recommendations lend themselves to implementation by the relevant central authorities, while others are more directly targeted at the authorities of Bratislava and the Trenčín region. In certain cases, effective implementation will depend on close coordination between the national and sub-national authorities, within the country's constitutional framework. It is for the Slovak Republic to decide which institutions or bodies are responsible for taking the necessary action.

82. In view of the findings in the present report, GRECO addresses the following recommendations to the Slovak Republic:

- i. that the national authorities improve coordination between national and sub-national levels in the preparation and the implementation of national anti-corruption policy documents, with a view to allowing sub-national authorities to provide meaningful contributions within their respective areas of responsibility (paragraph 24);
- ii. the authorities of Bratislava and the Trenčín Self-governing region that (i) analyses of integrity and corruption risks be carried out on a regular basis in relevant areas; and (ii) that remedial measures be included in anti-corruption policy documents to be adopted and implemented (paragraph 27);
- iii. that the national authorities consider introducing integrity safeguards for mayors and presidents of self-governing regions, as well as for their deputies and advisers, upon taking office, in order to identify and manage potential conflicts of interest (paragraph 29);
- iv. the authorities of Bratislava and the Trenčín Self-governing Region (i) that a code of ethics/conduct be adopted for members of the Bratislava city council, the mayor and his/her deputies covering all relevant integrity matters (e.g. conflicts of interest, gifts, contacts with lobbyists and other third parties, ancillary activities, handling of confidential information, asset declarations and post-employment restrictions) and made public; (ii) that this code and the Code of Ethics for Elected Representatives of the Trenčín Self-governing Region be complemented with practical guidance, including examples arising from day-to-day activities, and (iii) that both codes be coupled with a credible supervision and enforcement mechanism, including specific and effective sanctions/measures for violations (paragraph 37);
- v. that the authorities of Bratislava and the Trenčín Self-governing Region, for elected/appointed officials in the executive and representative bodies, (i) develop mechanisms to raise awareness on integrity matters and the (future) code of ethics, including through integrity training at the start of their term and on a regular basis throughout their term in office; (ii) establish a dedicated confidential counselling function to provide advice on integrity, conflicts of interest and corruption prevention (paragraph 41);
- vi. the authorities of Bratislava that, (i) the function of confidential advice on ethics and integrity matters be separated from the function of supervising compliance with the Code of Conduct for Employees; (ii) the body/authority entrusted with confidential counselling on ethics and integrity be provided with sufficient (human, financial and administrative) resources to perform its tasks (paragraph 43);
- vii. the authorities of the Trenčín Self-governing Region that (i) induction and regular in-service training on ethics and integrity provided to public employees be further strengthened; and (ii) a dedicated confidential counselling function be made available for interpreting and implementing these standards, and that public employees be duly informed of such a possibility (paragraph 45);

- viii. **to the national authorities that (i) a study be undertaken on the current regulatory framework and practices regarding the exercise of (paid and unpaid) outside activities by elected/appointed officials and employees of subnational authorities; (ii) and that, in the light of the findings of this study, the national regulatory framework be adequately developed/adapted to limit integrity-related risks and effectively supervise the exercise of outside activities (paragraph 47);**
- ix. **the national authorities that the legislation and practice governing post-employment rules with respect to officials and employees of subnational authorities in high-risk positions be subject to a substantive review as regards the risks of conflicts of interest and that adequate measures be implemented to mitigate any risks identified (paragraph 51);**
- x. **that the authorities of Bratislava and the Trenčín Self-governing Region establish, with regard to elected officials in the executive and representative bodies, more stringent rules on gifts and other benefits by (i) lowering significantly the thresholds for accepting, declaring and recording gifts, with a fixed monetary value; (ii) providing appropriate practical guidance on the valuation, acceptance and refusal of gifts and benefits offered; and (iii) making gifts registers accessible to the public (paragraph 56);**
- xi. **to the national authorities that the mechanisms for reviewing declarations of assets submitted by elected officials of subnational authorities be significantly strengthened, notably by giving competent bodies the powers and adequate human and financial resources to carry out substantial verification of the declarations submitted and investigate irregularities (paragraph 64);**
- xii. **that (i) the national authorities regulate lobbying to ensure transparency of interactions between lobbyists and officials involved in decision-making, including at the subnational level; or (ii) in the absence of such regulation, the authorities of Bratislava and the Trenčín Self-governing Region (1) improve the disclosure of contacts of officials involved in decision-making with lobbyists and other third parties seeking to influence public decision-making, including the identity of the persons met (or whom they represent) and the subject matters discussed, and (2) develop and disseminate guidance for officials on how to engage with lobbyists and third parties in a transparent manner (paragraph 75);**
- xiii. **that Bratislava and the Trenčín Self-governing Region take further measures to (i) raise awareness among their respective elected officials and public employees of channels and institutions for reporting misconduct and corruption offences, as well as whistleblower protection possibilities; and (ii) provide dedicated guidance and training on these matters (paragraph 78).**

83. GRECO invites the authorities of the Slovak Republic to draw the attention of all sub-national authorities, including, as appropriate, through their associations, to the recommendations contained in this report, where relevant to them, in order to address similar gaps in their own regulations and practices.

84. Furthermore, GRECO invites the authorities of the Slovak Republic to disseminate the good practices identified in the present report to the other sub-national authorities.

85. Pursuant to Rule 30.2 of the Rules of Procedure, GRECO invites the authorities of the Slovak Republic to submit a report on the measures taken to implement the above-mentioned recommendations by 30 September 2027. These measures will be assessed by GRECO through its specific follow-up procedure, in accordance with Rule 31 revised ter.

86. Finally, GRECO invites the authorities of the Slovak Republic to authorise, at their earliest convenience, the publication of this report and to make a translation of it into the national language available to the public.

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I. NATIONAL AND SUBNATIONAL SYSTEM OF GOVERNMENT

Constitutional and legislative framework, territorial structure and distribution of competencies

87. The Slovak Republic is a parliamentary republic and a unitary state (art. 3 of the Constitution), with 5.42 million inhabitants. The Head of State is the President of the Republic, who is directly elected by the citizens every five years. The legislative power is held by the National Council (Parliament), composed of 150 representatives elected every four years.

88. The organisation of public administration is decentralised, with two tiers of sub-national government: the lower tier consists of 2,927 municipalities²² (including city districts of Bratislava and Košice), 141 of which are cities, and the higher tier of 8 self-governing regions. In addition to the competences delegated to municipalities and regions, public administration at local level is also executed by 72 district offices which are responsible for executing state administration at the local level. As this report focuses on subnational authorities, it will not be dealing with district offices.

89. Municipalities are regulated by the Act on Municipal Establishment, as amended (No. 369/1990 Coll., hereafter the “Municipal Act”), except for the two largest cities of the country, Bratislava and Košice, which are each regulated by a specific Act and to which the Municipal Act applies subsidiarily. The supreme executive body and representative of the municipality is the mayor, elected in direct elections by the inhabitants of the municipality for a renewable four-year mandate. The mayor is assisted by a deputy or, for municipalities of more than 20,000 inhabitants, by two deputies appointed by the mayor for the duration of his/her mandate among the municipal councillors. The representative body of the municipality is the municipal council, consisting of municipal councillors elected in direct elections by the inhabitants of the municipality for a renewable four-year mandate. Municipal councils are composed of 3 to 41 councillors, depending on the number of inhabitants in the municipality. The municipal council decides on fundamental matters in municipal life, as laid down in art. 11.4 of the Municipal Act. It may set up and dissolve, as necessary, permanent or temporary executive, audit and advisory bodies.

90. Self-governing regions are governed by Act on the Self-Administration of the Higher Territorial Units, as amended (No. 302/2001 Coll., the “Self-Governing Regions Act”). The President is the representative of the self-governing region, elected in direct elections by the region’s inhabitants for a renewable four-year term. The regional council (or regional parliament) is the representative body of the region. It consists of councillors elected in direct elections by the inhabitants of the region for a renewable four-year term. The number of councillors varies according to the number of inhabitants. It is set by the regional council itself for the duration of its mandate, on the basis of one councillor for 12,000 to 15,000 inhabitants. The regional council decides on fundamental matters of regional life as laid down in art. 11.2 of the Self-Governing Regions Act. It sets up a mandate committee, finance committee and other committees as provided by special laws, as well as other permanent or temporary advisory, initiative and audit bodies, as needed. It elects and dismisses deputy presidents and a principal auditor of the region.

91. The capital of the Slovak Republic is Bratislava (art. 10 of the Constitution). Its status, self-administration, status of city bodies (at the city level of administration) and local bodies (at the sub-

²² The current list of municipalities and their parts is available here: <https://ives.minv.sk/obce/webformmain.aspx>

level of city districts) are regulated by the Act on Bratislava. At city level, the executive body is the mayor, elected in direct elections by the inhabitants for a four-year renewable term. The mayor is assisted by three deputies. The city council is the representative body at city level. It consists of 45 councillors elected in direct elections by the inhabitants for a four-year renewable term. The city council sets up a city board, committees, a city police and elects a city auditor. At city district level, the mayor, elected by the inhabitants for a four-year renewable term, is the executive body. S/he is assisted by a deputy. The representative body is the local council, composed of councillors elected by the inhabitants for a for a four-year renewable term. The number of councillors ranges from 5-7 in a city district of less than 2,000 inhabitants up to 25-35 in a city district with more than 100,000 inhabitants. The local council sets up a local board, committees and elects a local auditor.

92. The Slovak Republic signed the European Charter of Local Self-Government (the Charter) on 23 February 1999, and it entered into force, with certain limitations, on 1 June 2000. Since 1 September 2007, the Slovak Republic has been bound by the Charter in its entirety. The Slovak Republic has neither signed, nor ratified, the Additional Protocol to the Charter on the right to participate in the affairs of a local authority (CETS No. 207).

National anticorruption/integrity policy and applicability at subnational level

93. The Government of the Slovak Republic approved the most recent National Anti-Corruption Strategy 2026-2029 during its meeting on 21 January 2026. Pending its approval, the Anti-Corruption Policy of the Slovak Republic for 2019-2023 remained in force. The 2019-2023 Policy was addressed to the entire public administration, and it was binding for central state administration bodies. For sub-national authorities, the Policy is only a recommendation, and they are free to participate or not in the tasks it sets out. The Principles of Integrity in Public Administration, adopted by Government Resolution No. 49 of 31 January 2023, are meant to guide public officials in order to strengthen public trust in the rule of law and the quality of public services. As the Anti-Corruption Policy, the Principles of Integrity in Public Administration have an advice-giving character for the subnational level.

94. The Office of the Government is the national body primarily responsible for coordinating the prevention of corruption. Based on the Anti-Corruption Policy, it established on 2 May 2023 a council of anti-corruption coordinators, an advisory body which serves as a platform bringing together all anti-corruption coordinators across the public administration to share information on anti-corruption activities, primarily of central state bodies. Representatives of local governments, as well as the anti-corruption coordinator of the Association of Towns and Municipalities of Slovakia (ZMOS), are represented in this Council, which met twice a year in 2023 and 2024. Self-governing regions are not represented in the Council.

95. Cooperation between the Office of the Government and subnational authorities is implemented in the form of educational and training activities (organisation of discussion panels and lectures, promotion and distribution of materials on the prevention of corruption) resulting from two memoranda of cooperation, one with the ATMS, signed on 22 August 2024, and the other with the Trenčín Self-Governing Region, signed on 22 October 2024.

Implementation of national anti-corruption/integrity legislation by subnational authorities

96. Several national integrity-related laws apply to subnational authorities:

- a. the Act on the Protection of Public Interest in the Exercise of Public Officials' Functions, as amended (No. 357/2004 Coll., the Conflict of Interest Act) applies to mayors of municipalities and cities, presidents of self-governing regions, members of city councils and local councils of the Bratislava and Košice self-governing regions, as well as to members of regional councils of self-governing regions. It also applies to members of municipal councils. This Act regulates incompatibilities, duties of public officials in preventing conflicts of interests and liabilities in case of breach of these rules and duties.
- b. the Act on the performance of work in the public interest, as amended (No. 552/2003 Coll., the Work in Public Interest Act), applies to a broad range of employees performing work in the public interest, including Chief Controllers . It provides *inter alia* for the submission of asset declarations.
- c. the Act on the Protection of Whistleblowers of Anti-Social Activity and on Amendments and Supplements to Certain Acts, as amended (No. 54/2019 Coll., the Whistleblower Protection Act) applies to *inter alia* municipal entities as employers. It regulates internal and external whistleblowing channels and establishes a Whistleblower Protection Office.
- d. the Act on Free Access to Information and on Amendments and Supplements to Certain Acts, as amended (No. 211/2000 Coll., the Freedom of Information Act) applies primarily to state authorities, municipalities, self-governing regions, as well as to those natural and legal persons to whom the law confers the power to decide on the rights and obligations of natural and legal persons, within the scope of their decision-making authorities. It provides for the obligation to publish all available information – with certain exceptions. Contracts relating to the management of public funds concluded by the obligated persons also have to be published in the Central Register of Contracts administered by the Office of the Government, in order to be effective. In addition, according to Act No. 315/2016 Coll. on the Register of Public Sector Partners and on Amendments and Supplements of Certain Acts, as amended, the “Act on Register of Public Sector Partners, entities drawing funds from public resources have to register and provide information on their ownership and management structure in the Register of Public Sector Partners administered by the Ministry of Justice. The Ministry also administers the Register of Disqualifications, which records data on persons who, by decision of a judicial authority, may not *inter alia* perform the functions of member of a statutory body or supervisory body.
- e. A number of other national laws and regulations have an impact on local government, e.g. the Act on Budgetary Rules of Local Self-Government and on Amending and Supplementing of Certain Acts, as amended (No. 583/2004 Coll.), the Act on Budgetary Rules of Public Administration and on Amendments and Supplements of Certain Acts, as amended (No. 523/2004 Coll.), the Act on Financial Control and Audit and on Amendments and Supplements of Certain Acts, as amended (No. 357/2015 Coll.)etc.

97. The above-mentioned fundamental laws governing the scope of local government – the Municipal Act, the Act on Self-Governing Regions and the Act on Bratislava also contain essential anti-corruption and integrity-related provisions, as regards incompatibilities and oaths of office.

Statistics on corruption offences at subnational level

98. There are no disaggregated statistics available on complaints, investigations, prosecution and convictions for criminal offences of corruption at subnational level. The Ethics Commissioner maintains an internal register of investigations carried out under the Code of Ethics. The competent authorities systematically collect, analyse and publish statistical data on corruption-related crimes, which, however, are aggregated according to types of offences and their legal classification, rather than according to the position of perpetrators, including in public office. Therefore, the current arrangements do not allow identifying or quantifying corruption-related offences specifically in relation to subnational authorities of public administration.

II. INTEGRITY SYSTEM AT THE SUBNATIONAL LEVEL

Governance and finances

Bratislava

99. Bratislava is the capital of the Slovak Republic, with a population of 478,040 (as of 31 December 2023), and 571,110 within its agglomeration (as of 31 December 2019). It has 17 local districts.

100. Bratislava is a member of the Union of Slovak Cities²³ and of the K8 - Association of regional cities.²⁴ While neither of these associations have specific anti-corruption objectives, they aim at promoting transparency, commenting on relevant draft legislation and participating in relevant anti-corruption activities. Local districts of Bratislava are members of the Association of Towns and Municipalities of Slovakia (ATMS)²⁵.

101. Bratislava's main authorities are the Mayor and the City Council.

102. The budget of Bratislava is approved in accordance with the Act on Budgetary Rules of the Territorial Self-Government (No. 583/2004 Coll.). The budget for 2023 and forecasts for 2024 and 2025 were approved on 23 March 2023 by the City Council Resolution No. 105/2023.²⁶ The overall budget of Bratislava for 2023 in the revenue and expenditure was EUR 607 620 217. The forecast annual budget for 2024 is EUR 689 036 601 and for 2025 – EUR 570 027 465. The decrease in the annual budget is due to several factors, including the completion in 2024 of several large investment projects (e.g. covered by EU funds, state subsidies etc.), forecast decrease in certain tax and non-tax revenues owing to a slowdown of economic growth, and a conservative approach to forecasting of 2025 budget. The main sources of funding are personal income taxes received from the state budget and real estate taxes. Bratislava may receive grants and funds from external sources, which are usually earmarked for a specific purpose.²⁷ Several recent audits and inspections carried out in Bratislava did not point to the lack of transparency of expenditures.

²³ The [Union of Slovak Cities](#) unites cities and largest towns in the Slovak Republic. It counts 26 members, with a cumulative population of more than 1.2 million inhabitants.

²⁴ The website of the Association K8 is accessible via the following link: <http://www.k8.sk/>

²⁵ The Association of Towns and Municipalities of Slovakia (ATMS) represents cities, municipalities and local districts. It currently gathers 2787 local governments out of a total of 2929.

²⁶ The most recent budget for 2026 was approved by the City Council on 6 November 2025.

²⁷ Other funding sources of Bratislava include: European Union funds, such as the Integrated Regional Operational Programme for the revitalisation of public spaces, cycling infrastructure, or the modernization of public transport, state subsidies (e.g. from the Ministry of Transport – for road reconstruction, from the Ministry of Education, Science,

Trenčín Self-Governing Region

103. The Trenčín Self-Governing Region (Trenčín region) was established as one of eight self-governing regions on the territory of the Slovak Republic by the Self-Governing Regions Act. It spans over 4,502 km² and has a population of 569,390. It is the smallest of the eight regions. Its capital is the city of Trenčín. As other self-governing regions, the Trenčín region mainly has responsibilities in the following fields: road transport; railways; land communications; civil defence; tourism, regional development and environment; museums and galleries; social services; awareness-raising activities; libraries; education; sport; health care; urban planning and building regulations; financing of joint programmes of the Slovak Republic and the European Union.

104. The Trenčín region is a member of the association of Slovak self-governing regions SK8, which brings together all eight higher territorial units in the Slovak Republic. The association deals with topics and issues arising from the competences of the regions according to the Act on Self-Governing Regions. Accordingly, it does not deal with corruption and integrity issues.

105. The main authorities of the Trenčín region are its President and its regional parliament.

106. The budget of the Trenčín region is drawn up and approved in accordance with the Act on Budgetary Rules of Public Administration (No. 523/2004 Coll.) and the Act on Budgetary Rules of the Territorial Self-Government (No. 583/2004 Coll.). The total revenues of the Trenčín region for the fiscal year 2026 are forecast for the amount of EUR 298 million, of which current revenues are budgeted at EUR 233 million, and EUR 65 million for capital revenues. The budget expenditures of the region for 2026 are forecast at EUR 303 million.²⁸

Subnational institutional structure

Executive bodies

Bratislava

107. The mayor is elected by the residents of Bratislava in direct elections. A permanent resident of a municipality of at least 25 years of age on the date of the election, who has not been prevented from exercising the right to vote by a prison sentence or deprivation of legal capacity, can stand to be elected as mayor of that municipality. Mayors are not subject to integrity checks before taking office.

Research and Sport – for school renovations etc.), grants from foundations and NGOs (e.g. the Pontis Foundation, the Bratislava City Foundation etc.). These funds are always earmarked and can only be used for specific approved projects, but not for regular operational expenses.

²⁸ The Trenčín region budget for 2026 is composed of the region's own financial resources, subsidies from the state budget intended for the delegated performance of state administration in the field of Education, and external sources, including the EU structural funds and the state budget for the implementation of projects in individual sections within the EU programme funding period of 2021-2027, NextGenerationEU, JTF etc. There are three main budgetary revenue sources as follows:

- tax revenues: EUR 139 million,
- non-tax revenues: EUR 18 million,
- grants and transfers: EUR 141 million (including EUR 77,5 million from the state budget).

108. The mayor of Bratislava is represented by three deputy mayors, whom s/he appoints from among the members of the city council. Information regarding the mayor and deputy mayors is published on the official website of [Bratislava](#). The mayor also appoints and dismisses the director of the municipality's public administration, the City Hall, who elects his/her deputies.

109. Mayors are entitled to a salary²⁹ which is the product of the average national monthly salary and the applicable multiplier (the multiplier for the mayor of Bratislava is 3.98). The City Council may decide to increase this salary by up to 60 %. A deputy mayor is entitled to a salary determined by the mayor according to the material and time demands of the performance of the function, up to a maximum of 70 % of the monthly salary of the mayor. Information on salaries of the mayor and deputy mayors is available on the Internet³⁰.

110. The powers of the mayor are defined in Article 9 paragraph 6 of the Bratislava Statute. The mayor, *inter alia*, issues working and organisational regulations of the municipality, the code of ethics for employees and the regulations for their remuneration. The mayor also informs the city council about the issuance of and changes to the organisational regulations of the municipality. In addition, the mayor decides on all matters of municipal administration, not reserved by law or municipal statutes to the city council. The deputy mayors represent the mayor to the extent specified by him/her in a written assignment.

111. The mayor convenes and presides over meetings of the city council and the city board, and signs their resolutions, as well as generally binding regulations of the municipality. The mayor may suspend the enforcement of a city council resolution if s/he believes that it is contrary to law or is manifestly disadvantageous to the city by refusing to sign it (veto). In such a case the city council may confirm the resolution by a three-fifths majority of the votes of all members; if the city council fails to confirm the resolution in three months from its approval, it becomes null and void. The mayor may not suspend the enforcement of a confirmed resolution.

112. The grounds for the termination of office of mayors are specified in Article 13a of the Municipal Act and include *inter alia* resignation, refusal to take the oath of office, final conviction for a deliberate criminal offence and recall decided by a local referendum. Mayors cannot dismiss members of the council, and vice versa. Deputy mayors may be dismissed by mayors at any time, even without giving a reason, in which case they appoint a new deputy mayor within 60 days of the dismissal.

Trenčín Self-Governing Region

113. The president of the region is elected by the inhabitants of the Trenčín region – citizens of the Slovak Republic and foreigners with permanent residence in a municipality or a military district of the region – in direct elections for a four-year mandate. Any person who is eligible to vote, has reached the age of 25 and has not been prevented from exercising the right to vote by a prison sentence or disqualification from legal capacity, may be elected as president of a self-governing region. Presidents of regions are not subject to integrity checks before taking office.

²⁹ Pursuant to Article 3 paragraph 1 of the Act on the Legal Status and Salary Proportions of Mayors of Municipalities and Mayors of Cities (No.253/1994 Coll.).

³⁰ Accessible via the following link: <https://bratislava.sk/mesto-bratislava/transparentne-mesto/odmenovanie>

114. The president receives a remuneration according to the Act on salary ratios (No. 438/2001 Coll.). The salary is determined as a rule by a fixed amount from the product of the salary base, multiplied by a coefficient of 2. However, as the current president of the Trenčín region is also a member of the national Parliament, he is entitled to the minimum wage, in addition to his MP salary. As head of the executive, he is required to file a yearly declaration of assets (see below under declaration of assets), part of which is published. The name, function and CV of the president are published on the region's website³¹.

115. The president represents the Trenčín region externally, is the statutory body in property law, labour and other relations, as well as an administrative authority in matters in which the law entrusts the region with decision-making powers on the rights and obligations of natural and legal persons. The status, tasks and powers of the president are regulated by the Act on Self-Governing Regions. The president in particular convenes and presides the meetings of the council of presidents of commissions; decides on matters concerning the region except when these are delegated to the Trenčín region office; and issues the organisational regulations of the Trenčín region office concerning its internal organisation, the number of employees and their job functions; makes adjustments to the budget within the scope determined by the regional parliament.

116. The term of office of the president is terminated inter alia by resignation, refusal to take the oath of office or taking it with reservations, final conviction for a deliberate criminal offence or an offence for which the execution of a prison sentence was not suspended or further to a referendum for dismissal. Such a referendum must be initiated by the members of the regional parliament in three cases: absence or incapacity exceeding six months; gross or repeated negligence of his/her duties, thereby causing serious deficiencies in the administration of the Trenčín region; petition gathering 30% of the region's voters. The referendum must gather a majority of the votes cast, with participation of at least 50% of the voters.

117. The president is assisted by one or several deputy president(s), who represent him/her according to a written mandate. The deputy president(s) is/are elected by the regional parliament from among its/their members on a proposal by the president.

118. The budget of the Trenčín region is drawn up, approved and executed according to directive No. 2/2018 approved with the president, in accordance with laws on budgetary rules (Act No. 523/2004 Coll. and Act No. 583/2004 Coll.). It is drawn up by the office of the Trenčín region following an order approved by the president. The budget, as well as any amendments changing the total amount of revenue and expenditure, are approved by the regional parliament. The president approves changes if these total amounts remain unchanged or if changes are within 10% of the total amount of the approved budget for a given year. Financial statements of the Trenčín region are audited by an external company and the reports are published in the register of financial statements³².

119. The Trenčín region establishes, controls and abolishes budgetary and contributory organisations and other legal entities to perform basic public functions or other public utility activities. These organisations are legal entities connected to the Trenčín region budget (budgetary organisations) or contributing to it (contributory organisations). These organisations provide

³¹ [President of the Self-Governing Region of Trenčín, Authorities of the Self-governing Region of Trenčín, The Self-Governing Region of Trenčín, The Self-Governing Region of Trenčín](#)

³² www.registeruz.sk

cultural, social, health and school facilities, as well as the Trenčín region road administration. They may carry business activities outside their main activity with the consent of the Trenčín region.

Representative body

Bratislava

120. The representative body of Bratislava is its city council. It has 45 members elected by majority of votes cast by Bratislava residents, with each municipal district having at least one member in the council. There are no rules on balanced gender representation among lists of candidates or elected members. Any permanent resident of a Bratislava district who is at least 18 years of age is eligible. Legal obstacles applicable to being elected as mayor also apply for elections as member of the city council. Apart from these, no specific integrity checks are carried out prior to electing members of the city council. Members of the city council are remunerated in accordance with Article 25(8) of the Municipal Act and the remuneration regulations³³ approved by the city council. It may not exceed one month's salary of the mayor without increase in a calendar year. The grounds for termination of the mandate of members of the city council are the same as the mayor's (Articles 13a and 25, paragraph 2 of the Municipal Act).

121. The city council elects the members of the city board. The members are, by law, the deputy mayors, 17 mayors of the local districts and 10 members elected from among the city council members in the proportion of representation of members' political affiliation. The city council also establishes commissions³⁴ from among its members, as well as representatives of the professional public.³⁵ Determining a balanced representation of men and women is at the discretion of the respective commissions. The composition of the commissions of the city council is published on the website³⁶ of Bratislava. The city council adopts resolutions, which are to be signed by the mayor. Resolutions vetoed by the mayor may be confirmed by the city council within three months of the approval of the resolution.

122. The city council elects the city chief controller, as a rule, from among employees of the municipality, following a selection procedure set out in the Municipal Act.³⁷ The remuneration of the chief controller amounts to 2.78 times the average monthly salary of an employee for the previous calendar year (Article 18 of the Municipal Act). In addition to the monthly salary, the city council may approve a monthly remuneration for the chief controller of up to 30% of his/her monthly salary. The office of the chief controller has eight staff members, including six controllers.

³³ Accessible via the following link: <https://zastupitelstvo.bratislava.sk/poriadok-odmenovania/poriadok-odmenovania-poslancov-a-neposlancov-platny-od-01032023/>

³⁴ Under the current term of the Bratislava city council, the 12 following commissions have been set up: a) financial strategy commission, b) commission for management and business with city property, c) commission on environment and climate change, d) commission for urban and strategic planning and construction, e) commission for transport and information systems, f) commission for education, training and sport, g) commission for culture, media and heritage protection, h) commission for social affairs, health and housing development, i) commission for the protection of public order, j) commission for tourism and international cooperation, k) mandates committee, l) commission for the protection of public interest in the exercise of public functions.

³⁵ Who apply for membership in commissions on the basis of a public call on the website of Bratislava, social networks and the media.

³⁶ Accessible via the following link: <https://zastupitelstvo.bratislava.sk/>

³⁷ The selection procedure is open to any person who meets the conditions laid down in Act No. 369/1990 Coll. and in the Resolution announcing the election of the City Chief Controller.

123. Pursuant to the Bratislava Act, the city board serves as an initiative, executive, and supervisory body of the city council. It also performs an advisory function to the Mayor and a coordinating function in relation to the city districts. The control activity (i.e. control of legality, efficiency, economy and effectiveness in the management and disposal of the city's property) and property rights is performed by the chief controller (Articles 18 to 18f of the Municipal Act).

Trenčín Self-Governing Region

124. The regional parliament of the Trenčín region is composed of 44 members in the current 2022-2026 electoral period. They were elected by the inhabitants of the region in direct elections. Any resident of the region who is over 18 may be elected as a member of the regional parliament. Members are not subject to an integrity check before taking office. The remuneration of members is governed by the Principles of Remuneration of Members of the Trenčín Regional Parliament of 21 November 2022. Usually, members keep their original employment or activity for the duration of their mandate. They may be put placed on long-term leave for this period, in which case they are entitled to remuneration from the Trenčín region in lieu of salary or remuneration from their employment. Members have to file a yearly declaration of assets (see below). Their name, affiliation to particular districts or political parties, as well as each parliamentary commission they belong to, are published on the region's website³⁸. The term of office of a member of the regional parliament is terminated inter alia by resignation, refusal to take the oath of office or taking it with reservations or by final conviction for a deliberate criminal offence or an offence for which the execution of a prison sentence was not suspended.

125. According to article 11 of the Self-Governing Regions Act, the regional parliament decides on fundamental issues of the Trenčín region, in particular, it: enacts regulations; determines the principles of management and disposal of property owned and used by the Trenčín region; approves plans and programmes in the areas of social, economic, cultural development, as well as urban planning; approves the budget of the Trenčín region and its changes, controls the use of the budget and approves the final account of the Trenčín region; approves the staff remuneration regulations; calls a referendum; establishes, dissolves and controls legal entities of the Trenčín region and, on the proposal of the president, appoints and dismisses their heads.

126. The organs of the regional parliament are the council of presidents of commissions and other commissions, which it establishes as its permanent advisory, initiative and control bodies. They are composed of members of the regional parliament and of other persons elected by it. The commissions may invite practitioners to assess technical issues. The commissions' terms of reference are defined in article 20 of the Self-Governing Regions Act. The secretaries of the commissions are employees of the office of the Trenčín region.

127. The council of presidents of commissions (the council) gathers the presidents of the commissions, the deputy president(s) of the Trenčín region and the presidents of the Trenčín region political groups. It is an advisory body to the president of the Trenčín region, which mainly discusses materials prior to their submission to a session of the regional parliament, adopts opinions of a

³⁸ Information accessible via the following link on the Trenčín region's website: https://www.tsk.sk/trenciansky-samospravny-kraj/poslanci-tsk-vo-volebnom-obdobi-2022-2026.html?page_id=985406. Asset declarations of members are also published, according to the Conflict of Interest Act, on the following link: https://www.tsk.sk/trenciansky-samospravny-kraj/zastupitelstvo-trencianskeho-samospravnego-kraja/majetkove-priznania-poslancov-tsk.html?page_id=452629

recommendatory nature for the parliament and addresses other substantive issues related to the work of the parliament.

Public administration

Bratislava

128. The Organisational Regulations of Bratislava regulate the status and tasks of Bratislava city hall (mayor and deputies), its organisational structure, activities, management and relations with other bodies of the city. There are no rules on gender balance. Bratislava has 925 employees (as of 1 September 2024), of whom 136 work in the position of head of the civil service. The mayor's office consists of a director, his deputy, 6 advisers, a head of cabinet, 7 employees of the cabinet, 3 employees of the office of one deputy mayor and 2 employees for each of the offices of the other two deputies (23 employees in total).

129. The recruitment of public employees to managerial positions is regulated by the Work in Public Interest Act, in particular, its Article 5, and by an internal regulation on "Selection of Employees". The dismissal of public employees is regulated by the Labour Code (Act No. 311/2001 Coll.). During the recruitment, the integrity of public employees in management positions is verified during a personal interview, using the method of behavioural interviewing, by examining applicants' experiences or work history with previous employers. A clean criminal record is also a prerequisite for employment. During the employment, in the context of integrity control, a managerial employee must file an annual declaration of assets, which may be subject to review, and must also seek agreement prior to engaging in other gainful activities (see relevant sections on declaration requirements and outside activities below).

130. The average gross monthly wage in Bratislava in both the public and private sectors is EUR 1,724.28. The remuneration of employees of the city hall is governed by an internal regulation on employees' remuneration, which is not a public document. The average monthly salary/remuneration is, for general positions: EUR 1,780.19; for middle management positions: EUR 2,554.81; for senior/leading management positions: EUR 3,569.72; other benefits/contributions (e.g. transport allowance, meal allowance, jubilee bonus): EUR 113.65.

Trenčín Self-Governing Region

131. The office of the Trenčín region manages the administrative and organisational affairs of the regional parliament, the president and other bodies established by the regional parliament. The status and competence of the office are governed by the Self-Governing Regions Act. It *inter alia* drafts binding regulations and strategic documents, prepares the draft budget, ensures the execution of decisions of the region and handles contacts with state administration bodies. The office is headed by a director, who is accountable to the president. It is composed of 185 employees, 50 of whom are men and of the following organisational units: office of the president (6 employees); department of internal control, petitions and complaints (3 employees); the department of communication and international relations (5 employees); technical secretariat (8 employees).

132. The principal auditor is a member of staff of the region, elected for six years and dismissed by the regional parliament. His position and functions are determined by article 19 of the Self-

Governing Regions Act and his/her remuneration is determined by the regional parliament.³⁹ S/he is assisted by an office, composed of 9 employees including 8 auditors, which s/he manages and is accountable to him/her. The office of the principal auditor is part of the organisational structure of the office of the Trenčín region.

133. All vacancies in the public administration of the Trenčín region are published on the website of the region and on the Profesia portal (the largest job seeking portal in the Slovak Republic). They are also advertised in local and regional media, as well as on social media. The selection procedure is conducted orally or in written form, as laid down in the Work in Public Interest Act. Employees are not subject to integrity checks, but they have to provide an extract of their criminal record as a prerequisite for employment. The head of staff of the office of the Trenčín region has to file annual asset declarations.

134. Remuneration of public officials in the Trenčín region is governed by the Act on remuneration of employees in the performance of public work (No. 553/2003 Coll.). Accordingly, the average gross nominal monthly wage of employees of the Trenčín region in 2023 was:

- For entry-level positions, i.e. administrative workers: EUR 1,258;
- For middle-management positions: EUR 1,709 for technicians and professional workers; EUR 1,893 for specialists;
- For upper/senior management positions, i.e. legislators and senior managers: EUR 2,766;
- The average gross monthly wage in the Trenčín region in 2023 was EUR 1,509.

Anti-corruption/integrity policy and risk-assessment

Bratislava

135. Bratislava city council approved anti-corruption standards on 23 September 2021 by Resolution No.947/2021. They contain 91 measures, divided into ten areas of action.⁴⁰ The implementation of the anti-corruption standards is subject to regular evaluation through annual reports submitted by the mayor to the city council.

136. Bratislava does not carry out regular corruption risk assessments. It is also not directly involved in the implementation of the national anti-corruption policy.

Trenčín Self-Governing Region

137. The Trenčín region has an anti-corruption policy, which is published its website⁴¹. This one-page document was adopted by the Trenčín region on 22 July 2022, in accordance with the

³⁹ Under the Act no. 302/2001, the remuneration of the principal auditor is set at 70% of the remuneration of the President of the self-governing region. The regional parliament only determines the yearly reward, which can be up to 30 % of total yearly income of principal auditor.

⁴⁰ The areas of action are as follows: policy on public information on local government decision-making; transparent budgeting and public information on the budget; procurement and contract publication policy; policy for the disposal of city property; decision-making on the allocation of funds; employment policy and ethics; urban planning policy; policy for the allocation of flats and places in social facilities founded by the city; transparency policy in legal entities established and founded by the city and in companies in which the city has a majority shareholding; city media policy.

⁴¹https://www.TSR.sk/trenciansky-self-governing-region/office-TSR/anti-corruptionpolicy.html?page_id=973763

requirements of the norm ISO 37000:19. It is a statement of nine objectives, such as identifying and managing corruption risks, raising awareness to corruption and protecting whistleblowers. It applies to all employees and all persons acting on the behalf of the Trenčín region, as well as to organisations acting on its behalf. Any violation or weakening of the policy has to be reported to the contact person and/or mailbox identified in the document.

138. The policy is complemented by Directive No. 3/2022 on measures in the field of prevention of corruption, also published on the Trenčín region website. The directive establishes an anti-corruption management system for the Trenčín region office and all its activities and processes. Article 9.2 of the directive foresees an annual internal audit of the anti-corruption management system to be carried out by internal or external auditors. In practice, it is the anti-corruption supervisor who carries out the annual audits. As no notifications have been received regarding breaches of anti-corruption regulations, these audits have been concluded so far with no findings.

139. The Trenčín region does not contribute to the implementation of the anti-corruption policy of the Slovak Republic, as it does not apply to self-governing regions.

Standards of conduct and ethics

Code of conduct/ethics

Bratislava

140. The city council adopted on 24 September 2014 a code of ethics for elected officials. This code was applicable to the members of the city council, the mayor, the chief architect and the chief controller who were in office at that time. As this code was not endorsed by officials elected in subsequent terms, it is not binding on them.

141. As to the public employees, the most recent code of ethics for employees of Bratislava was adopted by order of the mayor and has been in force since 15 October 2024⁴². It applies to all employees and contains measures of a statutory, personnel, economic or organisational nature, which define a binding framework of action for processes and activities. It follows two previous codes dating from 2013 and 2021. Such codes of ethics for employees are usually drawn up by the internal legal support unit, in cooperation with the ethics commissioner.

142. The primary responsibility for ensuring compliance with the code lies with the ethics commissioner. The ethics commissioner is appointed by the mayor from among the staff of the city hall for a two-year renewable term, following a selection procedure by the ethics committee, open to staff members. Pursuant to Article 3.1 paragraph 4 of the code, the ethics commissioner (i) investigates reports of breaches of the code; and (ii) is responsible for the interpretation of the code and provides consultation in cases where an employee contacts him/her with a report of a breach or with a question regarding the acceptance of a gift.

143. Violations of the code by employees may lead to corrective action, including disciplinary measures, to be determined by the director of the city hall, the director of the mayor's office, or the

⁴² The code is published on Bratislava's website: https://cdn-api.bratislava.sk/strapi-homepage/upload/Z06_Etický_kodex_3905d038aa.pdf

chief of the municipal police (depending on the employee organisational classification). Such measures are to be based on the recommendations of the ethics committee and/or the ethics commissioner, in accordance with the tasks and activities of the ethics committee as set out in mayor's decision No. 35.⁴³ Should an investigation by the ethics commissioner give rise to a suspicion that a criminal offence has been committed, the commissioner is to refer the case to law enforcement authorities.

144. From 1 April 2021 to 30 September 2024, two formal notifications were filed for possible violations of the code of ethics for employees. The first concerned a possible breach of a conflict of interest, on which the investigation concluded that there was no breach. The second notification was made on a suspicion of misconduct in an official capacity, in connection with the receipt of an undue personal advantage. The investigation gave rise to a suspicion of a criminal offence and, therefore, the ethics commissioner referred the case to law enforcement authorities. Shortly thereafter, the employment with the person against whom the report was filed has been terminated by a severance agreement.

Trenčín Self-Governing Region

145. The Code of Ethics for Elected Representatives of the Region was adopted by the regional parliament on 27 March 2023. It was drafted by employees of the Trenčín region office and submitted for comments to all elected representatives prior to its adoption. It entered into force on the day of its adoption and replaced an earlier code of ethics approved by the regional parliament in 2016. The code contains ten articles, including inter alia provisions on conflicts of interest, donations, relations with the public and reporting obligations. It is published on the Trenčín region's website⁴⁴. These provisions are not illustrated by examples or comments. It applies to the president of the Trenčín region, members of the regional parliament, the principal auditor and members of the committees of the regional parliament. The code is not directly enforceable. Rather it is a standard, the main purpose of which is to reinforce public confidence in the regional parliament. The regional parliament's commission for the protection of public interest in the exercise of public office is responsible for compliance with the rules laid down in the code. Potential breaches are discussed in a meeting of the committee, where the official involved has a right to be heard. The meeting is concluded with a decision by the committee, which is made public. Responsibility for established breaches of the code is of a political nature only.

146. The Code of Ethics for Employees of the Trenčín region was adopted by the president of the region on 29 October 2021 and entered into force on the same day. It contains a series of principles dealing, inter alia, with conflicts of interests, gifts and other benefits, confidential information, relations with the public, social media etc. These provisions are not illustrated by examples or comments. The code is binding on all employees of the Trenčín region and, as it forms an integral part of the work regulations, it is directly enforceable. Violation of its provisions may lead to a breach of work discipline, which may be grounds for termination of employment under the provisions of the labour code in case of recurrence. The Trenčín region as employer is responsible for compliance with the code's provisions.

⁴³ Pursuant to Mayor's Decision No. 35 of 15 October 2024, the ethics committee is a consultative body consisting of five members appointed by the Mayor. Its tasks include preparation of opinions on notifications relating to breaches of the Code of Ethics, assessing the suitability of the candidates for the office of Ethics Commissioner, proposing amendments to the Code of Conduct, commenting on reports of the Ethics Commissioner and monitoring his/her activities.

⁴⁴ https://www.tsk.sk/buxus/docs/04_Etický_kodex_volených_navrh%2003-2023.pdf

147. There have been no records or reports of violations of the provisions of either code in the past five years.

Training and awareness

Bratislava

148. No regular training on integrity is provided to the mayor and his/her office, or to the members of the city council.⁴⁵

149. As regards public officials, since 1 November 2024, all new employees of Bratislava are being briefed by the ethics commissioner on the code of ethics for employees, basic ethical principles and standards and procedures to investigate reports of possible breaches of the code. Furthermore, employee trainings are conducted by the ethics commissioner each time the code of ethics is amended. No statistical data regarding employees/officials who received training on integrity is available. *Ad hoc* training activities on specific topics relevant to ethics and integrity are occasionally conducted by external experts. Accordingly, training on the prevention of sexual harassment at the workplace took place in 2023, training on workplace bullying took place in the first half of 2025 and training on the prevention of corruption was planned for September 2025.⁴⁶ Bratislava aims at organising such trainings at least once every six months. In addition, the monthly internal newsletter has been featuring since April 2025 a potential ethical dilemma and how to address it appropriately.

Trenčín Self-Governing Region

150. No training or information is provided to the executive, members of the representative bodies or public officials as regards ethics and integrity. However, directive No. 3/2022 foresees the obligation of all employees of the Trenčín region to undergo training once a year on the application of the anti-corruption policy and management system, as well as the obligation on the employer to provide such training (article 7.3). The only activities that were organised under this framework took place when the ISO 3700:19 standard was being rolled out.

Confidential counselling

Bratislava

151. There is no mechanism for confidential advice on ethics and integrity for elected officials of Bratislava (representative or executive).

152. Regarding public employees, this function is carried out by the ethics commissioner, who is competent for the interpretation of the code of conduct for employees and provides consultation

⁴⁵ In January 2026, a workshop on ethics and integrity in the exercise of public functions was organised in cooperation with the “Stop Corruption Foundation” with the participation of deputy mayors.

⁴⁶ The authorities later reported that the following activities were conducted in cooperation with the “Stop Corruption Foundation”: September 2025: a training session intended for middle/senior management – a full-day workshop focused on corruption prevention; January 2026: a workshop for highest management, The workshop was designed for individuals in leadership positions who seek to exercise influence in a fair and responsible manner; February 2026: a webinar for all employees, The webinar will provide basic guidance for navigating ethically challenging situations in the workplace.

upon request. The ethics commissioner can be contacted through a dedicated e-mail address etika@bratislava.sk as well as by telephone, or through the mailbox located in the municipal building. Each request for advice is handled with confidentiality.

Trenčín Self-Governing Region

153. There is no mechanism for confidential counselling in the areas of ethics and integrity available to the executive, members of the representative bodies or public officials of the Trenčín region.

Conflicts of interest

154. All politically elected/appointed officials of local and regional authorities are subject to the Conflict of Interest Act, that was already analysed by GRECO in its Fourth and Fifth Round Evaluation Reports. It defines conflicts of interest as situations where public officials put private interest before public interest when performing the duties of their office (Article 3 paragraph 4). In addition, they are expressly prohibited from using their functions, competence and information acquired in the course of or in connection with the performance of their duties to gain benefits for themselves, close relatives or other natural or legal persons (Article 4 paragraph 2).

155. Likewise, all public employees of local and regional authorities are subject to the Work in Public Interest Act, which sets out the general obligation of every employee to refrain from any action that could lead to a conflict of interest.

156. In the context of public procurement, the Act of Public Procurement (No. 343/2015 Coll.) applies.

Bratislava

157. Conflicts of interest are dealt with in greater detail in chapters 2.1⁴⁷ and 2.2 of the code of ethics for employees. The code distinguishes actual, potential and apparent conflict of interest. It is the duty of the employee to avoid all types of conflict of interest. Should an employee be unable to avoid a conflict of interest, irrespective of it being an actual, potential or apparent conflict of interest, they must immediately disclose it to their superior and to the ethics commissioner. Upon such notification, the ethics commissioner should guide the employee on how to avoid a breach of the code of ethics. Notifications are filed with the ethics commissioner but are not made public.

158. Chapter 2.2 of the code of ethics for employees focuses specifically on conflicts of interest in the area of public procurement, which takes precedence over the general conflict of interest provisions. Chapter 2.2 (1) states that an employee may not have a conflict of interest in relation to bidders in relation to the procurement of any subject matter of a contract. In this context, the conflict of interest provisions contained in Article 23 of the Act on public procurement also apply. Should an employee involved in the evaluation of public tenders discovers, or it becomes apparent

⁴⁷ Chapter 2.1 defines a conflict of interest as a situation in which, for personal reasons or because of a private interest, the impartial and objective exercise of the functions and performance of the duties of an employee is or could be impaired or jeopardised. A private interest includes a possible advantage for the employee, his family, friends, close associates and legal or natural persons with whom the employee or persons close to him have personal, business, financial or political relations.

during the selection/conditions of participation/evaluation/evaluation process/performance or modification of the contract, that a conflict of interest has arisen, the employee must immediately notify thereof the head of the procurement department and the ethics commissioner. The head of the procurement department is to decide on the action to be taken and inform the ethics commissioner. Conflicts of interest situations regarding the head of the procurement department must be reported to the ethics commissioner, who decides on the action to be taken.

159. Possible conflicts of interest are reported by employees on an ongoing basis and are generally handled by mail. No specific statistics or records are kept on these reports. No statistics are available on violations of conflict of interest provisions by elected officials.

Trenčín Self-Governing Region

160. The code of ethics for elected officials defines conflicts of interest as “a situation in which, for personal reasons or because of a private interest, the impartial and objective exercise of an elected official's functions and the performance of his or her duties is or could be impaired or compromised, or a situation in which an elected official may take advantage of his or her position in favour of a private interest. A private interest includes a possible advantage for the elected official, his family, friends, close associates and legal or natural persons with whom the elected official has a private, business or political relationship (hereinafter referred to as 'close associates'), in particular a commercial interest, a financial interest, a political interest or a family interest. Acting in favour of an elected official as an elected representative of a local authority (e.g. mayor, or member of a municipal council) shall not be considered to be the pursuit of a personal interest.” (article III) In such cases, the official has to notify the regional parliament and must abstain or not participate in the matter, voting or discussion. The identification of a conflict of interest lies in the hands of the officials themselves and there are no sanctions in case of breaches of the conflicts of interest rules. Conflicts of interest are neither documented nor disclosed to the public.

161. The code of ethics for employees defines conflicts of interest as any activities or actions which would bring the public interest into conflict with the interests of the staff member and the persons close to him/her. Any actual conflict or appearance thereof must be avoided, and the employee's supervisor notified. The employer has the duty to remove the employee from the relevant decision-making processes. Failure to notify conflicts of interest may trigger sanctions under labour law, such as a reduction of salary and, in extreme cases, termination of the employment contract.

162. There have been no declarations of conflicts of interest in the past five years.

Incompatibilities, prohibitions or restrictions of certain activities

Incompatibilities, outside activities, and financial interests

163. Politically elected officials of Bratislava and of the Trenčín region are subject to the regulatory framework on incompatibilities and outside activities of the Act on Conflicts of Interest. Accordingly, they are prohibited from performing functions and activities incompatible with public functions under the Constitution of the Slovak Republic and other laws (Article 5). Mayors and presidents of regions may not be members of a statutory, management or supervisory body of a legal person established for the purpose of conducting business activities, nor may they conduct

business activities (Article 5 paragraph 2). However, several exceptions to this rule are foreseen by the following paragraphs, including when the membership is not remunerated and when these officials are representing their city or region in such bodies. The restrictions on outside activities resulting from the Conflict of Interest Act do not apply to members of city/municipal councils and of regional parliaments (article 5 paragraph 6). Incompatible offices or activities have to be terminated within 30 days of the election to public office.

164. The Work in Public Interest Act and the Labour Code contain restrictions on outside activities applicable to all public employees of municipalities and regions. According to the Work in Public Interest Act, senior employees who perform the functions of a statutory body of a municipality/city or region may not engage in business or other gainful activities, or be members of the management, control or supervisory bodies of legal persons engaged in entrepreneurial activities. This prohibition does not apply if the employee is seconded to such bodies by the municipality or region but in that case, the employee may not perceive remuneration from these bodies. Other exceptions apply to work in the provision of health care, scientific, pedagogical, journalistic, literary, artistic or sporting activities (Article 9).

165. Any incompatible position or activity must cease within 30 days of the employee's appointment to perform the function of a statutory body. However, the Work in Public Interest Act does not provide for specific legal consequences in case of failure to comply with this obligation. Article 13, paragraph 1 of the Act states that if an employer is notified of a breach of an obligation or restriction by an employee under this Act, the employer is obliged to carry out the necessary verifications and to take measures in case a violation is established. The Act does not specify the nature of these measures.

166. As regards other employees, they may engage in gainful employment which is competitive to their employers' activity only with the employer's prior written consent and if such employment does not adversely affect the employee's work performance (Chapter 9, paragraph 1 of the Labour Code). Consent of the employer is not necessary for the performance of scientific, pedagogical, journalistic, lecturing, lecturing, literary and artistic activities.

167. More specific incompatibilities are foreseen at subnational level, as follows. Elected representatives and employees at the subnational level are not subject to any restrictions on the holding of financial interests, whether according to national or specific regulations.

Bratislava

168. The function of mayor is incompatible with the following: (a) member of the city and local council; (b) employee of the municipality in which the mayor was elected (except if the municipal employee is on long-term leave to perform the duties of mayor); (c) member of the statutory body of a budgetary organisation or a contributory organisation established by the municipality in which the mayor was elected, (d) president of a self-governing region, (e) leading employee of a public authority, (f) according to a special law, which covers *inter alia* incompatibilities with judicial or police functions (Article 13 of the Municipal Act).

169. Members of the city council cannot perform the following functions: (a) mayor/Prime Minister; (b) employee of the municipality in which they were elected, except if they are on long-term leave to perform the duties of a member; (c) member of the statutory body of a budgetary organisation or a contributory organisation established by the municipality in which they were

elected; (d) according to a special law (Article 11 of the Municipal Act). A member of the city council may simultaneously be a member of the local council or the mayor of a local district (i.e. local borough).

Trenčín Self-Governing Region

170. The Self-Governing Regions Act establishes the main incompatibilities for officials of self-governing regions. Accordingly, the office of the president is incompatible with the office of member of the regional parliament; member of the statutory body of a budgetary organisation or a contributory organisation established by the region in which s/he was elected; employee of a region; mayor of a municipality or a city. Additional incompatibilities may be established by special laws. Presidents of regions may, however, be members of the national parliament, as is the case of the president of the Trenčín region.

171. The office of principal auditor is incompatible with the office of member of the regional parliament; president of the Trenčín region; member of a body of a legal entity of which the Trenčín region is the founder; employee of the Trenčín region in other functions.

172. The office of member of the regional parliament is incompatible with the following positions: president of the Trenčín region; employee of the Trenčín region. Other incompatibilities are foreseen in other laws, such as the office of judge, lay judge, prosecutor or member of the Supreme Audit Office. Members of the regional parliament may hold another office at national level, for example, they may be members of the national parliament.

Post-employment restrictions

173. The mayor of Bratislava and the president of the Trenčín region are subject to post-employment restrictions under article 8 of the Conflict of Interest Act. These include a cooling-off period of one year prohibiting them from taking up employment or entering into an agreement with any natural or legal person to whom they granted any benefit, subsidy, public tender or any decision releasing such persons from their obligations under the law, for a period of two years prior to the end of their term of office. The city council/the Trenčín region commission for the protection of public interest in the exercise of public office may grant exemption from these rules if it is evident that they are disproportionate in a given situation. Such a decision must be motivated and published.

174. No post-employment restrictions apply to members of the Bratislava city council or of the Trenčín regional parliament.

175. No post-employment restrictions apply to public employees of Bratislava or the Trenčín region. A non-compete clause may be agreed in the employment contract under the labour code, but this possibility does not seem to be used in practice.

Gifts

176. According to Article 4 paragraph 2 (b) of the Conflict of Interest Act, politically elected officials in subnational authorities may not solicit, accept gifts, induce another to give gifts, or obtain other benefits in connection with the performance of their duties. An exception are gifts usually offered in the performance of a public function, or gifts given on the basis of a law. A value threshold

for gifts received in the performance of a public functions is set out in Article 7(1)(f) of the Conflict of Interest Act and requires declaring, as part of the official's annual financial declaration, any gift or benefit received during the calendar year, if the value of a single gift, or the total value of gifts from one donor exceeds 10 times the minimum wage.

Bratislava

177. There is no register of gifts or donations received by politically elected officials and no statistics are available in this regard.

178. As to public employees of Bratislava, chapter 2.3 of the code of ethics for employees prohibits the acceptance or solicitation of gifts or any other benefit for employees themselves or persons related to them, if the gift could influence their decision-making and professional attitude, real or perceived. Exceptions are provided for gifts and work-related hospitality of up to EUR 30, provided they do not influence the employee's decision or appear as a reward and for protocol or socially acceptable gifts. Gifts that cannot be refused must be turned over to the ethics commissioner within three working days.

179. The ethics commissioner maintains a register of gifts, which contains (i) the name of the employee having accepted the gift; (ii) the donor(s); (iii) a description (including the estimated value) of the gift and the reason why it was accepted by the employee; (iv) how the gift is disposed of. The register of gifts is not public. From October 2021 to September 2024, the ethics commissioner recorded a total of 41 gifts. Such gifts are generally used in cultural and social events of Bratislava employees as prizes, raffles, etc. or, in the case of perishable gifts, handed over to disadvantaged groups of residents. Any other use of a gift must be decided by the ethics commissioner on the proposal of the donor.

Trenčín Self-Governing Region

180. Article IV of the code of ethics for elected officials prohibits the solicitation or acceptance of any gifts in cash or in kind from third parties for activities related for the performance of their duties. Any gift or benefit accepted must be reported without delay to the person responsible for anti-corruption policy, who maintains a register of gifts. The gift register is not accessible to the public but information about gifts may be requested under access to information provisions. Registered gifts become the property of the Trenčín region, which must use them for public purposes. These rules do not apply to gifts and benefits which apparently do not exceed the value of 20% of the minimum wage (EUR 163). In addition, elected officials must not put themselves in a position to have to repay a service in connection with their office.

181. The code of ethics for employees of the Trenčín region also prohibits the acceptance of gifts and other benefits which might influence their decision-making and professional attitude or be regarded as remuneration for the performance of their duties.

Contracts with subnational authorities

182. There are no specific rules regarding contracting with respect of either politically appointed/elected officials or public employees. Politically elected/appointed officials must comply with the Conflict of Interest Act, establishing, for instance, an obligation to protect and promote the public interest, not to abuse office, not to broker business with the municipality/region for oneself

or a close person, etc. Public employees, in turn, must follow their respective codes of ethics, in particular the provisions regarding conflicts of interest, not abusing their position for personal gain, etc. Finally, the rules on the prevention of conflicts of interest stipulated in the Public Procurement Act (Article 23) are also relevant for the persons involved in such procedures.

Misuse of public resources and confidential information

183. In accordance with Article 4(2)(a) of the Conflict of Interest Act, politically elected or appointed officials of the executive and representative bodies may not use their office, powers and the information acquired in the exercise thereof, or in connection with the exercise thereof, in order to obtain advantages to their own benefit, the benefit of persons close to them or of other natural or legal persons; this does not apply to activities or tasks resulting from the exercise of their office.

184. As regards public employees of both Bratislava and the Trenčín region, the Work in Public Interest Act (Article 8(1)(c)) prescribes an obligation to respect the confidentiality of the information acquired in the performance of their duties, even after the termination of the employment relationship, unless they have been relieved from this obligation by their employer.

Bratislava

185. In addition to the national legal framework, Bratislava code of ethics for employees prohibits the misuse of official position and of confidential information (chapter 2.5). Moreover, chapter 6, paragraph 2(e) of Bratislava Work Regulations prescribes a duty to maintain the confidentiality of information and to protect personal data.

Trenčín Self-Governing Region

186. Art. V of the code of ethics for elected officials deals with the abuse of office and in particular, with the misuse of public funds or property, as well as the use of confidential information, for private interests.

187. The code of ethics for employees also prohibits the misuse of funds and property of the Trenčín region for personal gain. Employees must protect confidential information acquired in the performance of their functions, even after the end of the employment relationship.

Declaration of assets, liabilities, and interests

Declaration requirements

188. Politically elected/appointed officials – the mayor and members of Bratislava city council, the president and members of the regional parliament of the Trenčín region – have to declare their activities and interests in accordance with Article 7 of the Conflict of Interest Act. Declarations have to be submitted in writing within 30 days of taking office, then every year by 30 April and finally one year after the end of the term of office. The recipient of the declarations submitted by the members of local and regional executive powers is the national parliament's committee on the incompatibility of functions. The recipient of declarations filed by members of the legislative assemblies is that assembly's commission for the protection of public interest in the exercise of public functions; the

secretary of the commission keeps a register of declarations, containing the name of the official and the date of submission.

189. The following information must be declared:

- a) a declaration of compliance with the rules on incompatibilities;
- b) any outside professional or business activities;
- c) any offices held in other state, local and regional self-government bodies, bodies of legal persons conducting business and any other legal persons, as well as any income or benefits from such offices or activities;
- d) income from the performance of their public office as well as any other professional activity;
- e) their assets as well as the assets of their spouse and minors living in their household. This includes real property, for residential and non-residential use; movable property, whose customary value exceeds 35 times the minimum salary (approximately EUR 28,560); property rights or other assets whose nominal value exceeds 35 times the minimum salary; or liabilities whose subject matter is payment in cash in nominal value exceeding 35 times the minimum salary
- f) for the end of term declarations, natural or legal persons with whom the former official concluded contracts after leaving office”.

190. Declarations are published online, omitting personal data of the official’s close persons and data enabling the identification of their assets. Declarations of officials of the executive are published by the national parliament’s committee on the incompatibility of functions⁴⁸ and declarations of members of the local and regional legislative assemblies are published by the respective commissions for the protection of public interest in the exercise of public office⁴⁹. According to a study carried out by the local chapter of Transparency International, 87% of municipalities comply with publication requirements.

191. Public employees of Bratislava and the Trenčín region employed in managerial positions must declare their assets within 30 days of their appointment and subsequently by 31 March of each year for the previous calendar year, in accordance with the Work in Public Interest Act and the Civil Serviced Act. There are currently 136 employees⁵⁰ subject to this obligation in Bratislava. In the Trenčín region, there are 24 employees in management positions required to submit asset declarations to the Department of Personnel Management, Payroll and Crisis Management. It should include information on immovable property; movable property; property rights and other assets⁵¹. While movable assets and other valuable assets have to be assessed, there is no such obligation for immovable property. Public employees are not required to declare their financial obligations (loans, payments due etc.). The code of ethics for employees of Bratislava mirrors these obligations.

192. Managerial public employees of Bratislava submit their declarations in a sealed envelope to the registry of the municipality's citizens' services department. They are then transmitted to the

⁴⁸ <https://www.nrsr.sk/web/Default.aspx?sid=vybory/vybor&ID=173>

⁴⁹ Declarations by members of the Trenčín regional parliament are accessible via this link: https://www.tsk.sk/trenciansky-samospravny-kraj/zastupitelstvo-trencianskeho-samospravneho-kraja/majetkove-priznania-poslancov-tsk.html?page_id=452629.

⁵⁰ As of 1 September 2024.

⁵¹ Movable property and property rights and other assets must be included in the property return only if their aggregate value exceeds EUR 35,000.

ethics commissioner for possible checks and verifications (see below), who keeps them for a period of five years. The declarations are not made public. Similar arrangements are put in place in the Trenčín region, where the body responsible for receipt, checks and verifications is the Department of Personnel Management, Payroll and Crisis Management.

Review mechanisms

193. Declarations filed by the mayor of Bratislava and the president of the Trenčín region, as well as the mayors or major municipalities in the Slovak Republic, are reviewed by the parliamentary committee for the incompatibility of functions. The GET was informed during the on-site visit that the committee's secretariat has four staff members. The committee itself has 15 members. Over 2.000 declarations fall yearly into its remit. It submits reports on the results of reviews conducted to the parliament.

194. Verifications are in practice carried out by the committee's secretariat and are limited to the completeness and adequacy of the declarations. The secretariat can crosscheck information in the declarations with the data from business registers and other public registers. The committee may, in case of doubt, ask the public official for an explanation. If the explanation is not sufficient, the committee is authorised to initiate proceedings under section 9 of the Conflict of Interest Act. When it comes to failing to submit the declaration in due time, providing incomplete or incorrect information, this procedure can lead to the imposition of fines (one month's wage for not filing a declaration in time, three months' wage for providing incomplete or incorrect information in their declaration. The decision of the committee is to be adopted by a resolution by a simple majority, except for a decision to discontinue proceedings which requires a three-fifth majority in parliament. Meetings of the committee are not public, but the committee's vote is public. Decisions are subject to judicial review by the Constitutional Court. Since October 2024, three proceedings were opened against mayors.

195. The same rules and procedures apply to the declarations submitted by the members of the representative bodies of local and regional authorities, which are verified by the commission for the protection of public interest of Bratislava city council and the Trenčín region regional parliament respectively. These commissions are composed by members of the representative bodies – nine members and one secretary in the case of Bratislava, six members and one secretary for the Trenčín region – and are accountable to them. They are entitled to ask the officials concerned for an explanation in the event of doubts as to the completeness or truthfulness of declarations. Should the competent body consider the explanation insufficient, it is entitled to initiate proceedings. The commissions' meetings are not public.

196. As to public employees, chapter 2.6, paragraph (4) of the code of ethics for employees authorises the Bratislava ethics commissioner to review their asset and financial interest declarations based on a reasonable doubt about the accuracy of the information provided, as well as the completeness of declarations. This procedure is usually triggered by a notification about a possible violation of the code of ethics which raises doubt about the amount of an employee's assets or the way they were acquired. The ethics commissioner invites the official concerned in writing to complete the information, or to provide an explanation within 30 days. Should the commissioner believe that the supplementary information or explanation was insufficient, an investigation may be initiated (subchapter 3.3 of the Bratislava code of ethics for employees), and the employee may be requested to explain the reasons for such substantial changes in the assets. Should an investigation be initiated by the commissioner, the mayor may assign members of the ethics

committee and the city manager/chief of mayor's office/city police chief to take part in the reviewing of the declaration(s) concerned.

Transparency, access to information and public participation

Access to information

197. Access to information is regulated under the Freedom of Information Act, which applies to the decision-making activities of *inter alia* local and regional authorities, as well as natural and legal persons insofar as they can decide on individual rights and obligations. Information must be disclosed without having to establish legal or other reasons or interest (Article 3). The Slovak Republic has neither signed nor ratified the Council of Europe Convention on Access to Official Documents (CETS 205).

198. Bratislava and the Trenčín region are under an obligation to publish certain official information concerning public interest, arising from various legal regulations (Freedom of Information Act, Act on Financial Rules of Public Administration etc). Categories of information subject to disclosure include budget and management;⁵² contracts, invoices and orders;⁵³ public procurement;⁵⁴ resolutions and decisions.⁵⁵

199. Restrictions on access to information concern, *inter alia*, information classified according to law, personal data, and trade secrets (Article 9).

200. In Bratislava, the procedure for disclosure of information is further regulated by directive S17 on disclosure of information, approved by the mayor. Following amendments made to this directive in 2022 and 2024, online staff training was carried out, for approximately 50 employees. In 2022, training was conducted for public employees of Bratislava in relation to the disclosure of information. This training was provided by the internal legal support unit, which provides training upon request for different departments/units.⁵⁶

201. Publication and access requests regarding information held by the Trenčín region are registered and handled by the internal control, complaints and petitions unit of the Trenčín region office.

Transparency and public participation in decision-making

⁵² Information on the authority's budgets, expenditure and revenue, including the approved budget and its implementation.

⁵³ All contracts to be compulsorily published under the Freedom of Information Act, as well as invoices and orders, must be published on Bratislava/the Trenčín region website and in the Central Register of Contracts of the Office of the Government of the Slovak Republic.

⁵⁴ All information on public procurement, including announced tenders, results and contracts with contractors, is to be available through electronic systems such as the Central Register of Contracts or on the website of the Public Procurement Office.

⁵⁵ Resolutions, draft regulations, results of votes and decisions, as well as minutes of the meetings of the city council/regional parliament.

⁵⁶ Each training session lasts approximately 90 minutes and reaches about 50 online participants. Recordings of trainings are also made available.

Bratislava

202. Citizens have the opportunity to speak at the sessions of the city council on each item after approval by the members council (Article 5, paragraph 16 of the rules of procedure of the Bratislava city council) as well as under a separate item, without the need for approval. In addition, the Municipal Act allows the public to comment on draft regulations. All materials discussed at the city council, records of the proceedings, minutes and resolutions are to be published, and its proceedings are broadcast live. Draft ordinances are published for comments 24 or 15 days before the council meeting at which they are to be discussed. Other routine material is published seven days before the meeting at which it is to be discussed.

203. The Municipal Act also provides for the possibility of public participation in the comment procedure (Article 6 (4)). Following the date of publication of the draft general regulation, natural persons and legal entities may submit, within at least 10 days, their comments on the draft in writing, electronically or orally on the record. Subsequently, the proposer of the regulation must evaluate the comments and submit the result to the city council no later than three days before its deliberations.

Trenčín Self-Governing Region

204. Meetings of the regional parliament are public, and the public may speak upon submitting an advance request, which must be approved by members.

205. Draft resolutions to be approved at council meetings are published on the official notice board at least 15 days before the meeting, so that the public may comment on them. This practice goes beyond the legal requirement of a 10-day period for commenting on draft regulations (Article 8 of the Self-Governing Regions Act).

Third parties and lobbyists

206. There are no rules regarding contacts of elected officials or employees of local and regional authorities with third parties and other lobbyists, nor regarding the disclosure of such contacts.

Control mechanisms, oversight and accountability

Compliance mechanisms

Bratislava

207. Compliance with the anti-corruption and integrity legislation by politically elected/appointed officials of Bratislava falls within the remit of the parliamentary committee on incompatibility of functions (mayor and deputy mayors) and the city council commission for the protection of public interest in the exercise of functions of public officials (members of the City Council).

208. Supervision over compliance with integrity rules by public employees of Bratislava is mainly the responsibility of the ethics commissioner, along with the ethics committee, both appointed by the mayor. In the performance of these tasks, they may be assisted by other persons or units, such as the municipal police chief, the internal legal support unit, etc.

Trenčín Self-Governing Region

209. Directive 3/2022 on measures in the field of prevention of corruption, which establishes an anti-corruption management system for the Trenčín region office, foresees the appointment by the president of the Trenčín region of a supervisor in charge of overseeing compliance with anti-corruption rules. The supervisor assesses on an ongoing basis the effective implementation of the anti-corruption system, as well as its adequacy to manage corruption risks faced by the Trenčín region. S/he summarises the results of his/her observations in a review report which is submitted once a year to the president for approval. The supervisor may call on external consultants to assist in the review.

210. The Commission for the Protection of Public Interest in the Exercise of Public Office is tasked with overseeing compliance by the president of the region and members of the regional parliament with the applicable rules, in particular those contained in the Conflict of Interest Act. It has a president and five members, with the secretary of the commission providing technical support for meetings and documents.

Internal control/audit

Bratislava

211. Internal control falls within the remit of the chief controller, who is an employee of the city elected and dismissed by the city council. The chief controller controls compliance with legality, efficiency, economy and effectiveness in the management and disposal of city property, financial operations (revenue, expenditure etc.), handling of complaints and petitions, compliance with binding legal regulations, including those of the city, implementation of the city council resolutions. Beyond the city, the controller's remit extends over budgetary and contributory organisations established by it and legal entities in which the city has an ownership interest. The control activity does not apply to proceedings in which, in the field of public administration, the city decides on the rights, legally protected interests or obligations of natural persons and legal entities.

212. The internal audit department is an organisational unit of the city hall that holds an independent position. It is functionally and organisationally separated from the management and control structures of the city hall, as well as from the performance of financial control. The internal audit department reports on its auditing activities directly to the mayor. the activities of the internal audit are governed by its rules of procedure and internal audit directive S19. The audits carried out by the internal audit department are primarily economic in nature, not focused on corruption.

Trenčín Self-Governing Region

213. The internal control, complaints and petitions unit of the office of the Trenčín region carries out internal control over the Trenčín region office and organisations under its jurisdiction, on the basis of a mandate given by the president of the Trenčín region. In particular, it performs inspections, financial control over selected financial operations and assesses the economy, efficiency and effectiveness of the use of public funds. It also keeps a central register of records and reports of inspections carried out by internal and external control bodies, with the exception of the public procurement office.

214. The office of the principal auditor conducts audits of lawfulness, economy and efficiency of the management and disposal of property held and used by the Trenčín region, audits of revenue and expenditure of the region, audits of the handling of complaints and petitions, audits of compliance over applicable rules and regulations, and performance audits. The office of the Trenčín region, state-funded and non-profit organisations set up by the Trenčín region, legal persons in which the region has an ownership interest or that lease or dispose of the property of the region, as well as persons receiving subsidies from the region are subject to the principal auditor's jurisdiction (article 19c of the Self-Governing Regions Act).

External control/audit

215. External audits of Bratislava and the Trenčín region can be carried out *inter alia* by the supreme audit office, the office for the protection of whistleblowers, the public procurement office, etc., each within the scope of their respective powers. There have been no audits regarding corruption or integrity issues carried out by these bodies over the evaluated local and regional authorities in the past five years.

Independent/social audit

216. The Municipal Act and the Act on Accounting establish an obligation to independently audit individual and consolidated financial statements for cities and municipalities. In March 2023, Bratislava contracted the audit company "BDO Audit, spol. s r.o." to carry out audit services for the individual and collective financial statements for 2022-2025 through public procurement. The audit reports for 2023 and previous years have been made available online.⁵⁷ The Trenčín region is subject to independent audits for individual and consolidated financial statements, as are all self-governing regions in the Slovak Republic.

217. No independent/social audit has been carried out by the Trenčín region.

Administrative review

218. According to the administrative procedure code, decisions adopted by local and regional authorities may be appealed to the issuing authority. The relevant entity of the municipality or the region may decide itself on the appeal, or submit it, within 30 days from reception to the appeal body - the mayor of Bratislava or the president of the Trenčín region. The decision of the mayor or the president as an appellate administrative review body is final.

219. In addition, administrative review over the acts and decisions of local and regional government authorities is carried out by the public prosecutor's office, in accordance with the act on the public prosecutor's office. The prosecutor may issue a formal protest, a notice or a petition to instigate court proceedings against a regulation or an individual decision. The authority may grant the protest and review the regulation or decision. If it refuses to grant the protest, the prosecutor may appeal to the court. A notice is issued in case improper procedures were followed to issue an act or decision.

⁵⁷ <https://bratislava.sk/mesto-bratislava/transparentne-mesto/rozpocet-a-hospodarenie/zaverecny-ucet>

Judicial review

220. The judicial review of administrative decisions of local and regional authorities is regulated by the administrative court procedure code. Petitions for judicial review must be filed within two months of the notification of a decision or a measure adopted by a public administration body, unless provided otherwise. An administrative action by the public prosecutor on the decision of the authority not to grant the prosecutor's protest must be taken within the same time limit. The administrative court may annul the contested decision or dismiss the complaint.

221. The decision of the administrative court in first instance may be subject to review through cassation by the supreme administrative court.

Disclosure of corruption and integrity violations, whistleblower protection

Public complaint mechanisms

222. Complaints regarding conflicts of interest, asset and financial declarations, and other integrity matters related to the mayor and members of the Bratislava City Council can be submitted to the Parliamentary Committee on Incompatibility of Functions and the City Council's Committee for the Protection of Public Interest. Complaints can be filed in writing or electronically, providing details of the issue and the person submitting the complaint. Both committees review and handle these complaints according to their procedures, ensuring transparency and accountability in public office. Complaints regarding possible violation of the code of ethics for employees by public employees of Bratislava can be submitted to the Ethics Commissioner either by depositing it in a secure box located in the lobby of the city hall, sending it to a secure mailbox⁵⁸ or orally on record to the ethics commissioner.

223. Reports against suspected misconduct, corruption or breach of ethics by elected officials or employees of the Trenčín region may be sent to the anti-corruption supervisor by post or e-mail to a dedicated mailbox⁵⁹. The supervisor investigates reports and transmits its findings to the president or the director of the office of the Trenčín region for them to take necessary measures.

Reporting obligations

224. The criminal code (Article 340) provides for an obligation to report to law enforcement all offences punishable by at least ten years' imprisonment as a maximum penalty, which covers all criminal offences of corruption, as well as all preparatory acts of such offences (Article 341). These provisions equally apply to all political officials and employees of local and regional authorities.

225. The respective codes of ethics that apply to employees of both evaluated entities and to elected officials of the Trenčín region also contain a duty to promptly report any suspected corruption, misconduct or breach of the code. It is recalled that no code of conduct applies to Bratislava elected officials. Hence, they are under no obligation to report misconduct that does not amount to a criminal offence.

⁵⁸ etika@bratislava.sk

⁵⁹ protikorupcii@TSR.sk

Whistleblower protection

226. The legal framework for whistleblower protection is provided by Act No. 54/2019 on the protection of Persons Reporting Anti-Social Activities (Whistleblower Protection Act). It regulates the conditions for the protection of persons against unjustified sanctions in employment relationships in connection with reports of crime or other anti-social activities, as well as the rights and obligations of natural and legal persons in reporting such acts. It also regulates the obligations of the State, local and regional authorities in the area of prevention of anti-social activity and anti-corruption education and training.

227. The Act defines serious anti-social activity as an unlawful act, in particular:

- damaging financial interests of European Communities (Articles 261 to 263 of the Criminal Code (CC)), scheming in public procurement (Article 266 CC), corruption and some offences of public officials under chapter 8 of the special part of the CC;
- criminal offences for which the CC lays down a sentence of imprisonment with an upper limit exceeding three years; or
- administrative offences carrying a fine with an upper limit of at least EUR 30,000.

228. The Act allows whistleblowers to remain anonymous to their employer. Persons wishing to obtain protection must file a request with the prosecutor or the competent administrative authority, depending on the nature of the facts reported.⁶⁰ A reward can also be awarded to the whistleblower up to 50 times the minimum wage.

Bratislava

229. Bratislava adopted directive No. 29 on the submission, verification and registration of notifications of whistleblowers of anti-social activities to implement the national legal framework. It regulates the conditions for providing protection to persons in an employment or other similar relationship, as well as the procedure for submitting, receiving, verifying and storing reports. It also prohibits the obstruction of the submission of reports and any retaliatory measures against the whistleblower.⁶¹ These protective measures are mirrored in the code of ethics for employees.

230. The authority designated for receiving whistleblower notifications within the meaning of the Whistleblower Protection Act is the chief controller. Notifications may be made in writing, by e-mail or orally and relevant information is published on Bratislava's website⁶². It is possible to submit a notification anonymously. The chief controller independently investigates the case, informs

⁶⁰ The victim and/or witness, as well as the injured party in criminal proceedings, are granted a legal status in accordance with the Criminal Procedure Code. Within the framework of criminal proceedings, a victim may hold the status of a notifier of a criminal offence, an injured party, or a witness, and is accordingly entitled to the rights and bound by the obligations as stipulated under the relevant provisions of the Code. The protection of victims and the principles governing the provision of protection and support to victims are regulated by Act No. 247/2017 Coll. on Victims of Crime. In addition to the provisions relating to criminal procedure, the protection of witnesses is specifically regulated by Act No. 86/2025 Coll. on Witness Protection.

⁶¹ A person submits a report of anti-social conduct to the designated official (in Bratislava – chief controller). If the whistleblower suspects retaliatory conduct against him/her, this should also be reported to chief controller, who must examine the report to determine whether retaliatory action is being taken. Should the whistleblower file a report directly with the Whistleblower Protection Office, any report regarding potential retaliatory measures against the whistleblower are also to be submitted to that Office.

⁶² <https://bratislava.sk/mesto-bratislava/transparentne-mesto/oznamovanie-protispolocenskej-cinnosti-v-podmienkach-hlavneho-mesta-sr-bratislavy>

involved parties and, where relevant, reports findings, along with proposed corrective measures, to law enforcement authorities in case of facts of a criminal nature. Only one whistleblower report was registered in 2020-2024.

Trenčín Self-Governing Region

231. The Trenčín region has two different systems for handling reports of wrongdoing. According to directive No. 4/2022 on the Internal System for Receiving, Verifying and Registering Notifications of Corrupt Behaviour, anyone may file a report regarding anti-corruption or integrity-related misconduct to the supervisor, who is obliged to record and investigate it. To this extent, the supervisor has inspection power to access premises and request documents. The report of the investigation is submitted to the whistleblower and the persons investigated. Following the investigation, the supervisor may refer the case to law enforcement authorities or any other relevant authority, or close and file the case.

232. In implementation of the Whistleblower Protection Act, directive No. 5/2019 on the Internal System for Receiving, Verifying and Registering Notifications of Anti-Social Activities established the principal auditor to receive whistleblowing reports by employees of the Trenčín region. Reports may be addressed to him by post or e-mail⁶³. The system set-up is similar to the one described in the above paragraph under directive No. 4/2022.

233. Since the entry into force of both guidelines, no whistleblowing reports have been filed.

Enforcement and sanctions

Non-criminal enforcement mechanisms

234. Possible breaches of the Conflicts of Interest Act or other integrity-related provisions by the mayor and deputy mayors of Bratislava, as well as the president and vice-presidents of the Trenčín region, are to be investigated by the parliamentary committee on incompatibility of functions, whereas those committed by members of Bratislava city council and the Trenčín regional parliament are to be investigated by the commission for the protection of public interest in the exercise of public office of the respective assembly. These committees operate on their own initiative or upon complaint. They may recommend by majority the imposition of any of the sanctions foreseen under the Conflicts of Interest Act (Article 9, paragraphs 6 to 17), from a fine to an obligation to terminate incompatible office and activities and to the loss of mandate. The decision to impose such sanctions is taken by the national parliament for members of the executive and by the city council or regional parliament for the members of the evaluated representative assemblies.

235. As to public employees of Bratislava, the observance of the code of conduct is to be ensured by the ethics commissioner. Notifications of possible violations are to be investigated within 30 days. The written opinion concluding the investigation is forwarded to the president of the ethics committee and the director of the city hall/chief of the municipal police/director of the mayor's office, depending on the employee's position. Considering the commissioner's assessment, the ethics committee establishes, with a majority decision, a position on the violation and a recommendation for action, which is transmitted to the relevant employer. The final decision regarding corrective and disciplinary action is to be taken by the employer.

⁶³ hlavnykontrolor@TSR.sk

236. Violations by a public employee of the code of ethics constitute a breach of work discipline and carry the following sanctions: a) warning, accompanied by specific measures to remedy the deficiency; b) withdrawal of incentive salary components of pay (e.g. personal allowance if awarded, nonpayment of exceptional remuneration); c) reduction in leave; d) dismissal (for repeated minor breaches and serious breaches of work discipline)⁶⁴.

237. A similar system and sanctions apply to the violation of integrity norms by public employees of the Trenčín region, under directives No. 3/2022 and No. 4/2022. The anti-corruption supervisor investigates any notification received and proposes sanctions, as per staff regulations, to the president of the Trenčín region. The president may delegate the competence to impose sanctions on the director of the office of the Trenčín region.

238. Furthermore, breaches of conflict of interest obligations pursuant to Article 23 of the Public Procurement Act are considered an administrative offence and the Public Procurement Office may also apply a fine. For contracts also financed from external sources (e.g. EU funds), a 100% correction and the obligation to return the funds may be applied.

Criminal procedure

239. None of the politically elected officials or employees of local and regional authorities are subject to immunity from criminal proceedings. They are, therefore, subject to the general provisions of the criminal code and the criminal procedure code. Under the criminal code, the commission of a criminal offence by abusing one's employment or position to obtain an unjustified advantage is an aggravating circumstance.

Statistics

240. There have been no cases in the past five years of elected officials or employees of Bratislava or the Trenčín region being removed on grounds of corruption or other integrity-related misconduct, nor have there been any criminal case of corruption involving such officials.

241. In 2024, the parliamentary committee on the incompatibility of functions investigated a complaint against the mayor of Bratislava regarding the publication on social media of a video and posts on the opening of a renovated commercial space, in possible violation of Article 4(2)f of the Conflict of Interest Act, which prohibits the use by an official of his name or image for advertising purposes. The committee concluded to an absence of violation.

242. Between 2021 and 2024, the Bratislava ethics commissioner investigated one case regarding a possible violation in the awarding of grants, which was subsequently referred to the law enforcement authorities.

⁶⁴ As per Chapter 11 of Bratislava Staff Regulations.

Membership of the Council of Europe's anti-corruption body, the Group of States against corruption (GRECO), spans the European continent and also includes the United States of America and Kazakhstan.

GRECO members (48) 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 (20 May 1999), Hungary (9 July 1999), Georgia (16 September 1999), the United Kingdom (18 September 1999), Bosnia and Herzegovina (25 February 2000), Latvia (27 July 2000), Denmark (3 August 2000), the 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), the Republic of Moldova (28 June 2001), the 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), and Kazakhstan (16 January 2020).

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

