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# FIFTH EVALUATION ROUND

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

## COMPLIANCE REPORT

# LITHUANIA



Adopted by GRECO  
at its 96<sup>th</sup> Plenary meeting (Strasbourg, 18-22 March 2024)



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



## **I. INTRODUCTION**

1. The fifth GRECO evaluation round concerns “Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies”.
2. This Compliance Report assesses the measures taken by the authorities of Lithuania to implement the recommendations made in the Fifth Round Evaluation Report on Lithuania which was adopted by GRECO at its 89<sup>th</sup> plenary meeting (29 November – 3 December 2021) and made public on 25 April 2022, following authorisation by Lithuania ([GrecoEval5Rep\(2020\)1](#)).
3. As required by GRECO’s Rules of Procedure,<sup>1</sup> the authorities of Lithuania submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 2 October 2023 and, together with additional information, served as a basis for this report.
4. GRECO selected Latvia (in respect of top executive functions in central governments) and Bosnia-Herzegovina (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed – Mr Viktors LAIZĀNS for Latvia and Mr Adnan DLAKIĆ for Bosnia-Herzegovina – were assisted by the GRECO Secretariat in drawing up this report.
5. The Compliance Report assesses the implementation of each individual recommendation contained in the Evaluation Report and gives an overall appraisal of the level of the member’s compliance with these recommendations. The implementation of any outstanding recommendations (partly or not implemented) will be assessed on the basis of a further Situation Report to be submitted by the authorities 18 months after this Compliance Report is adopted.

## **II. ANALYSIS**

6. GRECO made 17 recommendations to Lithuania in its Evaluation Report. Compliance with these recommendations is dealt with below.

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

### **Recommendation i**

7. *GRECO recommended that the Code of State Politicians’ Conduct be complemented with illustrative guidance for its implementation regarding conflicts of interest and other integrity- related matters (e.g., preventing and managing conflicts of interest, contacts with lobbyists and other third parties, post-employment restrictions, etc.) and (ii) that similar documents and guidance be established in respect of civil servants of political confidence and the President of the Republic.*

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

8. The Lithuanian authorities report, in relation to the first part of the recommendation, that on 15 December 2021, the Chief Official Ethics Commission (COEC) approved the Methodological Recommendations for Ethics Commissions of Municipal Councils on the Assessment of the Compliance of the Conduct of Municipal Mayors and Municipal Councillors. The purpose of the Recommendations is to assist the ethics commissions and other bodies responsible for investigating non-compliance of state politicians' behaviour with the Code of Conduct. On 23 August 2023, these Recommendations were updated to conform to the Provisions of the Code of Conduct for State Politicians. The Recommendations address procedural, as well as substantive matters, and briefly discuss the provisions of the Code of Conduct. Further, in 2023, the COEC made available on its website information leaflets regarding the basic duties for newly appointed public officials, post-employment restrictions for public servants and other matters. The leaflets were also transmitted to compliance officers via the Register of Private Interests. The authorities indicate that the Methodological Recommendations and information leaflets are also relevant for civil servants of political/personal confidence.
9. In December 2021, on the occasion of the International Anti-Corruption Day, to raise awareness of integrity and prevention of corruption, the COEC released video sketches performed by actors, illustrating most common situations on avoiding conflicts of interest, including acceptance of gifts, risks posed by affinity, employment of relatives, and cooling-off period after leaving public service. Further, in 2022, the COEC launched a dedicated website to assist in clarifying public and private interests of public officials and to provide access to anonymised opinions of the COEC on the implementation of the provisions of the Law on the Adjustment of Public and Private interests (LAPPI).
10. In relation to the second part of the recommendation, the authorities report that on 12 December 2022, the Chancellery of the President of Lithuania approved the Rules of Anti-Corruption Conduct and Ethics of the Chancellery of the President. These rules are applicable to public officials of political trust, career public officials and contract-based staff. Further, the authorities point out that following the amendments to the Law on Prevention of Corruption, which entered into force on 1 January 2022, independent institutions (e.g. the Chancellery of the Seimas, the Chancellery of the President, the Chancellery of the Government, ministries, the Bank of Lithuania, municipal administrations or any other state or municipal institutions) must have a code of conduct, or anti-corruption rules, taking into account the specificities of the institution's activities and setting out basic standards of transparency and anti-corruption behaviour of their respective employees, as well as providing examples of potential corruption risks and actions to be taken, should such risks be identified.
11. GRECO takes note of the information provided by the authorities. The adoption and publication of the Methodological Recommendations to assess compliance with the Code of Conduct for State Politicians, and its relevance to public officials of personal/political confidence are encouraging. GRECO also notes additional efforts to raise public officials' awareness of conflicts of interest, gifts and post-employment restrictions. That said, the measures taken do not appear to fully address the first part of the recommendation. The Methodological Recommendations referred to in paragraph 8 above are targeted mainly at municipalities (mayors and municipal

counsellors). It would be necessary to have a similar guiding document for PTEFs, or to adapt the Methodological Recommendations to that effect, and make it systematically available to all PTEFs. This part of the recommendation has therefore been only partly complied with.

12. As to the second part, GRECO welcomes the adoption of Rules of Anti-Corruption Conduct and Ethics of the Chancellery of the President, which applies to all public officials employed in the Chancellery. While this is a step in the right direction, there is still no guiding document regarding ethics and integrity that would be applicable to the President. Therefore, GRECO cannot consider the present recommendation as implemented more than to some extent.
13. GRECO concludes that recommendation i has been partly implemented.

#### **Recommendation ii**

14. *GRECO recommended that (i) systematic briefing on integrity issues be imparted to all persons with top executive functions upon taking up their positions and at regular intervals and; (ii) confidential counselling on ethical issues be accessible at government/ministry level and at the President's Office.*
15. The Lithuanian authorities refer, in relation to the first part of the recommendation, to information leaflets produced in 2023 regarding the basic duties for newly appointed public officials, post-employment restrictions and other integrity matters (see paragraph 8 above). The COEC, in cooperation with the Civil Service Department, aims to inform all newly appointed public officials, including those of political/personal confidence, of basic requirements of professional ethics and sources where further information and advice may be obtained. Further, the authorities once again refer to the website launched in 2022 with the purpose of increasing awareness among public officials regarding declaration and management of conflicts of interest, post-employment restrictions and other provisions of the LAPPI. This website also contains anonymised opinions of the COEC on specific cases regarding the implementation of the provisions of the said law. Owing to the COEC receiving multiple questions on similar subjects, as of 2022, individual responses to frequently asked questions have been made available on the above website.
16. In September 2023, the COEC completed a remote learning and testing platform, which forms part of the Register of Private Interests, primarily intended for ethics advisors. It is expected to enable compliance officers to assign training courses and assessments to any of the employees subject to LAPPI regulations. According to the authorities, this new learning tool has been approved on 24 January 2024 and has been made available for persons connected to the Register of Private Interests. In addition, the authorities refer to the provisions of the Law on Corruption Prevention, which requires public sector entities to provide training to employees on creating a corruption-resistant environment<sup>2</sup> and to establish units responsible for creating a corruption-resistant environment, or to appoint persons responsible for creating a corruption-resistant

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<sup>2</sup> Article 23(2)(5) of the Law on Combating Corruption.

environment<sup>3</sup> and monitor employees' compliance with the standards of anticorruption conduct. Such entities should also be tasked with advising employees on anti-corruption issues in the areas of work of their respective institutions<sup>4</sup>.

17. In relation to the second part of the recommendation, the authorities submit that in March 2023, the Compliance Department was set up in the COEC, which includes among its main functions to advise heads of public sector institutions and their deputies on the reconciliation of public and private interests, lobbying, and the formulation and implementation of ethics policies. The authorities submit that since the setting up of this Department, over ten high-ranking officials have sought confidential advice on the implementation of different provisions of the LAPPI and the Law on Lobbying Activities.
18. GRECO takes note of the information provided. In respect of the first part of the recommendation, it notes new training and awareness raising measures taken by the COEC and considers them to be a useful addition to the integrity safeguards already in place. GRECO also notes the authorities' intention to ensure that all newly employed public officials, including those of personal/political confidence, are duly informed of the integrity standards and conduct expected of them. GRECO looks forward to learning more about the implementation of these recent initiatives in practice. That said, GRECO received no information as to briefings on integrity matters provided at regular intervals to PTEFs already in office.
19. Regarding the second part of the recommendation, GRECO notes the setting up of a new administrative entity within the COEC, the Compliance Department, which has as a primary role of collecting and analysing data from public institutions regarding the implementation of anti-corruption legislation, providing policy advice and assisting the COEC in providing methodological guidance to the ethics commissions of municipal bodies, representing the COEC before public institutions and, where appropriate, international organisations. GRECO notes that several public officials have sought the Compliance Department's advice on anti-corruption legislation. While these are positive developments overall, it is not clear from the Regulations of the Department that the advice it provides is to be confidential. In addition, the function of ensuring compliance is difficult to reconcile with that of confidential counselling, when endowed upon the same body. Therefore, the second part of the recommendation has not been complied with.
20. GRECO concludes that recommendation ii has been partly implemented.

### **Recommendation iii**

21. *GRECO recommended that complementary measures be taken to ensure that adequate timelines for public consultations on government draft legislative initiatives are foreseen and respected in practice.*
22. The Lithuanian authorities report that on 9 November 2022, the Rules of Procedure of the Government of Lithuania were amended to ensure quality and sustainability of

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<sup>3</sup> Article 24(1) of the Law on Combating Corruption.

<sup>4</sup> Article 13(3) of the Law on Combating Corruption.

legislation and allow adequate timelines for public consultations on legislative initiatives emanating from the Government. Thus, according to paragraph 21.2.1 of the Rules of Procedure, in respect of draft laws submitted for adoption to Parliament which were not included in the proposals for the Government legislative programme of the relevant session of Parliament, the need for their adoption through accelerated procedure should be substantiated and information on possible negative consequences of their non-adoption should also be provided. Further, according to the Rules, the Government Chancellery shall not examine a draft legal act if the time allowed for public consultation has been too short, or if the draft legal act was not submitted for public consultation at all. The Rules of Procedure further set out cases when public consultation is required, indicate the purpose of the consultation processes and types of information that can typically be collected during the consultation. Additionally, the Rules stipulate that the results of consultations should be presented to decision-makers and be announced on the e.Citizen online platform.

23. The authorities stress that the promotion of transparency and openness in the public sector is regarded as a priority, as demonstrated in the long-term policy documents, such as the 2021-2030 National Progress Programme and the 2021-2030 Public Management Development Programme. This priority is further confirmed in the strategy entitled “Lithuania 2050”, approved by Parliament on 23 December 2023.
24. Further, the Open Government Unit of the Office of the Government is responsible for overseeing the implementation of the public consultation mechanism within ministries and, as of 2017 is monitoring annually the quantity and quality of public consultations. This Unit also developed eight methodological tools that encompass the practical implementation of innovative citizen engagement activities (co-creation and deliberative democracy). In addition, since 2021, the Office of the Government took steps to promote public consultations and citizen engagement through some 20 training courses, conferences and roundtable discussions involving public officials organised as part of the project entitled “Open Government Initiatives” (which ended on 21 December 2022) and other on-going initiatives implemented by the Unit.
25. Finally, on 16 November 2022, the Ministry of Justice published the draft of Methodological Recommendations for legislation, which stress the importance of complying with the deadlines in public consultation process and seek to reduce the application of urgent and very urgent procedures in legislation. The Recommendations underline that the Rules only set minimum deadlines for consultations and that complex and large-scale draft legislation exceeding 10 pages should allow for public consultation deadlines beyond the 12 working-day period. Once approved, the Ministry intends to make these Recommendations applicable not only in Government’s legislative procedures, but also to subordinate institutions. In addition, the authorities inform that the Rules for coordination of draft normative acts of ministries, government institutions and other entities of public administration subordinate to the Government are in preparation. These Rules will, inter alia, set out uniform legislative and public consultation procedures and an obligation of public consultations for all relevant government institutions.

26. GRECO takes note of the information received from the authorities. It would appear that some concrete steps are taken to ensure that adequate timelines are provided for public consultations on draft legislation emanating from the Government, notably by requiring that the urgency of adopting draft laws not included in the legislative programme of the Government is substantiated, possible risks stemming from their non-adoption are duly explained, and draft laws on which the public has not been consulted sufficiently are not examined. Furthermore, the annual monitoring of public consultations, carried out by the Open Government Unit of the Office of the Government, as well as various activities for public officials to promote public consultations are commendable.
27. Some further recommendations to allow for adequate time limits for public consultations on draft legislation have been published by the Ministry of Justice, and further rules on these matters are expected to be approved by the Government, but have not been finalised yet. GRECO notes that these are steps in the right direction, but will need to reassess the situation once the said recommendations are approved, and practical examples of their application are available. At present, this recommendation can be considered as implemented only partly.
28. GRECO concludes that recommendation iii has been partly implemented.

#### **Recommendation iv**

29. *GRECO recommended (i) making more information publicly available regarding meetings (formal and informal) held by ministers and civil servants of political confidence with third parties, including lobbyists, and that such entries contain a sufficient amount of detail on the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion and (ii) that an independent assessment of the implementation of the Law on Lobbying Activities be conducted and the law is amended as appropriate in view of the results of this assessment.*
30. The Lithuanian authorities report that the Law on Lobbying Activities, which entered into force on 1 January 2021, provides all the necessary legal preconditions for monitoring these activities and for ensuring adequate transparency. They reiterate that the President, members of Parliament and the Government, chancellors of ministries, heads of parliamentary political parties, mayors, members of municipal councils, directors and deputy directors of municipal administrations are required to make their agendas<sup>5</sup> public. Further, the authorities indicate that since 1 December 2021, it is required that websites and mobile applications of state and municipal authorities include the agendas of the head of institutions, deputy head(s), vice-ministers, and chancellors of ministries, including meetings and conferences, their purpose, time, and persons attending. By way of example, the authorities referred to management agendas of the Ministry of Agriculture and the Ministry of Health, both accessible on their respective websites.

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<sup>5</sup> At the same time, the authorities point out that neither the Law, nor the Government resolutions do not regulate the content of such agendas.

31. In September 2023, the COEC approved an informational leaflet regarding publication of agendas, which recommends the following:
- public agendas should include meetings (including remote meetings) with stakeholders, interest groups and lobbyists, rather than internal meetings/meetings with colleagues on work-related issues;
  - if possible, the names of the legal entities and natural persons attending the meeting should be indicated;
  - agendas should briefly describe the purpose, date, time, place and outcome of the meeting.
32. The authorities further underline that both the lobbyists, as well as the public officials who are being lobbied in relation to draft legal acts, are under an obligation to report such activities within seven calendar days, and that such reports are made public<sup>6</sup>. Through reports on lobbying, the COEC is supervising transparency of lobbying activities, examines declarations and aims at preventing infringements. According to the authorities, about 300 lobbying declarations are submitted by lobbyists and lobbied officials per year, and are cross-referenced in the system for declarations of lobbying activities. The authorities point out that the number of registered lobbyists and declarations has increased significantly between 2020 and 2023, with 122 registered lobbyists in 2020 and 355 in 2023. In 2020, the COEC received 273 reports on lobbying activities, while some 635 such reports have been submitted in 2023. The authorities recall that the COEC provides methodological guidance to persons seeking to identify lobbying activities and to distinguish them from other activities, not considered lobbying under the Law on Lobbying Activities (over 100 such inquiries are received per year). Most of such recommendations in 2021 were related to the obligation for members of Parliament, the Government, and political trust teams of ministries to declare the lobbying influence.
33. In relation to the second part of the recommendation, the authorities consider that as the Law is still quite recent, carrying out an assessment of its implementation would be premature. In their view, the practical effect of legislation appears only after a certain period of time, once the actors affected by this legislation have adapted to it. At this stage, the authorities prioritise evaluating the organisational and practical measures directed towards the implementation of the Law in practice, and the assessment of the Law itself be carried out only if the need for further legislative solutions is established.
34. GRECO notes that in respect of the first part of the recommendation, concrete steps were taken to include the necessary information in the reports on lobbying activity, received by the COEC. A recently published information leaflet can be a valuable instrument to raise awareness on the matter. The increasing number of registered lobbyists and reports on lobbying activity is also encouraging. However, the examples provided by the authorities regarding the agendas of ministries contain only general information, without indicating details of meetings, or participants, such as lobbyists or other third parties, aiming to influence the decision-making in the Government.

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<sup>6</sup> The reports on lobbying activities must disclose the name of lobbyist, name of the official lobbied and the beneficiary, title of the legal act and the draft legal act concerned, and a brief description of the subject matter regulated by the legal act or the draft legal act.



Therefore, it remains unclear whether these meetings are accorded the necessary degree of transparency. As to the second part of the recommendation, GRECO points out that an independent assessment of the implementation of the Law on Lobbying Activity could also very well cater for evaluating practical steps taken for the implementation of this Law, and not only its legal provisions *per se*. It therefore calls upon the authorities to carry out such assessment, as required by the recommendation. Overall, the present recommendation cannot be considered as implemented more than partly.

35. GRECO concludes that recommendation iv has been partly implemented.

#### **Recommendation v**

36. *GRECO recommended establishing a more robust set of rules together with appropriate practical guidance on gifts and other benefits for persons entrusted with top executive functions, including the obligation of reporting them and informing the public.*
37. The Lithuanian authorities refer to the Guidance on restrictions on the acceptance of gifts and services, developed by the COEC in 2020, which *inter alia* aims at assisting public officials in distinguishing situations they may encounter in their official capacity, or as private individuals, when receiving gifts or services. Beyond gifts, the Guidance is also said to cover catering, accommodation and invitations to events. The authorities reiterate that accepting of gifts is not permitted under the LAPPI, whereas the Law on Lobbying Activities prohibits lobbied officials from accepting gifts or other rewards from lobbyists. According to the authorities, some recent assessments carried out by the COEC revealed that stakeholders express different positions on the assessment of the scope and (or) the assessment whether gifts received are in accordance with the law. These assessments also suggest that the provisions of the LAPPI regarding gifts need further clarification; in particular, it was noted that the LAPPI does not define hospitality or traditions. In response to these assessments, the COEC prepared draft legislative amendments, which will be discussed with relevant stakeholders in the course of March and submitted to Parliament at the end of April 2024.
38. In addition, the authorities submit that in October 2023, the COEC announced a public procurement for the modernisation and of the Register of Private Interests with a view to ensuring that any gifts received by public officials are registered and accounted for by their respective institutions. One of the objectives of the modernisation is providing that public institutions have a unified format for registering gifts, enabling extraction and publication of relevant data. The modernisation process is expected to be completed by the end of 2024.
39. GRECO takes note of the information provided by the authorities. It would appear that the restrictions and acceptance of gifts and services are still mainly governed by the COEC Guidance of 2020, which was already in place at the time of the adoption of the Evaluation Report. That said, the authorities show awareness that some further changes need to be made, and promising initiatives are in the pipeline to clarify the legislative provisions regarding gifts. GRECO encourages the authorities to address the transparency regarding gifts in a comprehensive manner, along the lines of the present recommendation, when carrying out the intended legislative amendments, and make

sufficiently detailed guidance available to the PTEFs on the subject. At present, this recommendation cannot be considered as complied with, even partly.

40. GRECO concludes that recommendation v has not been implemented.

#### **Recommendation vi**

41. *GRECO recommended that the declarations of private interests of persons entrusted with top executive functions be subject to regular substantive control and that the Chief Official Ethics Commission be provided with adequate resources for this task.*
42. The Lithuanian authorities reiterate that the COEC verifies declarations of high-ranking officials, which has been formalised in accordance with the Order No. T-24 of the Chairman of the COEC of 13 September 2023, instructing the [newly established] Compliance Department to conduct verifications according to the verification plan annexed to that Order. Prior to the entry into force of the above Order, the COEC, in the context of examining notifications regarding public officials' behaviour, discovered incomplete or erroneous filings and issued reminders for revising or supplementing declarations to more than 80 public officials, with an overall number of such reminders reaching about 100 per year.
43. GRECO takes note of the information received from the authorities. It notes that a new Order of the Chairman of the COEC now establishes a periodic verification of declarations of private interests by most public officials in top executive functions to be carried out during 2024. This is a welcome development. That said, GRECO received no information as regards the number of PTEFs whose declarations have already been verified, or whether such verifications will be carried out in respect of PTEFs annually (the verification plan only covered 2024). In addition, no information was provided regarding any additional resources allocated to the COEC to perform this new task in an efficient manner. Pending additional evidence of the implementation of this recommendation in practice, it cannot be considered as implemented more than partly.
44. GRECO concludes that recommendation vi has been partly implemented.

#### **Recommendation vii**

45. *GRECO recommended (i) that the respective roles of the Chief Official Ethics Commission and of the heads of institutions charged with ensuring compliance of persons entrusted with top executive functions with the provisions of the Law on the Adjustment of Public and Private Interests be clarified and (ii) that the investigation of possible violations of the provisions of the Law by persons entrusted with top executive functions be carried out by an independent authority following a clear procedure*
46. The Lithuanian authorities acknowledge that there is no clear distinction in the legislation as to which body should have primary responsibility in conducting investigation of possible violations by PTEFs of the LAPPI. However, they specify that in practice, such violations are, as a rule, investigated by the COEC. To remedy this issue, in 2023 the COEC initiated amendments to the Law on the Chief Official Ethics Commission with the aim to define more clearly the rights and duties of compliance

officers, the responsibility of heads of relevant institutions for non-compliance with the LAPPI, and clarify that investigations on these matters are to be conducted by COEC. These draft amendments are expected to reach Parliament during the spring session of 2024.

47. The authorities point out that in the performance of its functions, the COEC is an independent body, acting in accordance with the powers established by law and that interference by politicians, officials, political parties, civil servants, associations, other legal or natural persons with the COEC activities is prohibited. In addition, the authorities also inform that the COEC is competent to receive and examine complaints by persons in respect of whom an investigation was carried out and decision taken by a public institution or body<sup>7</sup>.
48. GRECO takes note of the information provided. It is promising that the Lithuanian authorities recognise the need for clear delimitation of competences to investigate possible integrity violations by PTEFs, and that legislative amendments are in preparation to address this. GRECO calls upon the authorities to use this opportunity and provide in law that any such possible violations involving PTEFs are indeed investigated by an independent body, and not officials subordinate to them (see paragraph 158 of the Evaluation Report). In addition, establishing clear procedures for investigating such violations would also be necessary. As the entire process is at a very early stage, for the time being GRECO cannot consider this recommendation as implemented, even partly.
49. GRECO concludes that recommendation vii has not been implemented.

#### **Recommendation viii**

50. *GRECO recommended that the sanctions for violations of the Law on the Adjustment of Public and Private Interests be reinforced in order to ensure that they are effective, proportionate and dissuasive.*
51. The Lithuanian authorities reiterate that the responsibility of high-ranking officials for integrity-related violations is often political, and investigations in such matters receive significant media attention. Thus, the 2022-2023, the COEC made decisions regarding three high-ranking officials, one of them resulting in the resignation of the Deputy Minister of Finance. Furthermore, in 2023, even prior to the COEC investigations were carried out, the Minister of Education and the political trust advisor at the Presidential Office resigned from their positions due to possible violations that occurred several years ago when they held office in the municipality. In addition, the provisions of the LAPPI consider that any violation of conflicts-of-interest provisions determined by the COEC amounts to gross violation of this Law and may be subject to pecuniary penalties, as per the Code of Administrative Offences.

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<sup>7</sup> As per Article 241 of the Law on the Chief Official Ethics Commission. Such complaints may be lodged with the COEC within one month from the date of rendering of the decision. Upon examination of the complaint, the COEC may decide either to uphold the complaint and annul the contested decision in full or in part; to order the institution which took the challenged decision to comply with the COEC's instruction; or to dismiss the complaint as unfounded.

52. GRECO notes that no new measures have been reported by the authorities in relation to this recommendation. Therefore, the concern expressed in the Evaluation Report<sup>8</sup> regarding the absence of any tangible sanctions for violations established by the COEC in respect of the President, members of Parliament and ministers has not been addressed. GRECO calls upon the authorities to reconsider this situation and introduce effective, proportionate and dissuasive sanctions applicable to PTEFs for integrity-related violations.
53. GRECO concludes that recommendation viii has not been implemented.

*Preventing corruption and promoting integrity in law enforcement agencies*

**Recommendation ix**

54. *GRECO recommended (i) that a broad analysis be carried out on the legal framework and practice of private donations and sponsorship to the Police and the State Border Guard Service and that, in light of its findings, rules are adopted to abandon private donations/sponsorship to the Police and the State Border Guard Service or, as a minimum, limit the risks of corruption and conflicts of interest in this respect; and (ii) that donations and sponsorship received are published on a regular basis (including on-line), indicating the nature and value of each donation as well as the identity of the donor.*
55. The Lithuanian authorities submit that following a decision of 11 April 2023, an internal audit of the legal regulation and evaluation of the practice of receiving donations by the Police Department under the Ministry of the Interior (hereinafter – the Police) was carried out, resulting in recommendations on the setting up of a unified procedure of reception, accounting and use of the sponsorship, which should include the following provisions: objects of accepted sponsorship; procedure of acceptance of sponsorship and taking a decision on the use of the sponsorship; internal regulation of accounting and responsibility; evaluation of feasibility of the use of the sponsorship; assigning of control measures and responsible unit; publication of information on the sponsorship received and used within the calendar year and the establishment of a requirement to perform risk assessments during each acceptance of the sponsorship on possible conflict of interests that may arise, as well as other risks related with the acceptance of the sponsorship (risk for reputation, image, etc.). As a result of this audit, on 9 May 2023, the Police Commissioner General issued Order No. 5-V-396<sup>9</sup> and the corresponding action plan on the implementation of measures provided in the recommendations. Finally, the legal regulation<sup>10</sup> on the acceptance of the sponsorship was adopted by the Commissioner General on 3 November 2023.

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<sup>8</sup> According to paragraph 160 of the Evaluation Report, “none of the sanctions laid down in article 23 of the Law apply to the President of the Republic or to ministers. The only measure foreseen for them is the publicity of the COEC’s decision establishing a violation. For civil servants of political confidence, there are pecuniary sanctions but the COEC can only recommend to the head of the relevant institution that a disciplinary sanction be applied.”

<sup>9</sup> “On approving the action plan for the implementation of the recommendations indicated in the internal audit report on the evaluation of the legal framework and practices of the aid received by the Police”.

<sup>10</sup> The regulation entitled “Description of the Procedure for Receipt and Use of Sponsorship in the Police Department under the Ministry of the Interior of the Republic of Lithuania and its Subordinate Police Institutions” was approved by the Order No 5-V-867 of the Commissioner General of the Lithuanian Police.

56. Further, the State Border Guard Service (hereinafter – SBGS) analysed the legislation on the provision of private donations, as well as the practice in this regard. According to this analysis, no cases of possible conflicts of private interests or increased the risk of corruption were identified. Therefore, it was decided not to refuse private donations, which, for the SBGS, are regulated under the Order No. 4-206<sup>11</sup> of the Head of the SBGC, issued on 17 June 2021. Following the analysis referred to above, on 2 August 2022 the rules on receiving and accounting for donations have been further supplemented by Order No 4-249 of the Head of the SBGS to ensure transparency in the acceptance of donations or support. In particular, a new provision has been added setting out the specific procedure for the disclosure of information on material assets received by the SBGS from natural persons as well as from non-state institutions and organisations. Finally, the authorities indicate that information regarding sponsorship received by the Police<sup>12</sup> and SBGS<sup>13</sup> is available online.
57. GRECO takes note of the various measures taken by the Police and the SBGS to address the present recommendation. It welcomes the analysis of legislation and practice regarding potential risks of conflicts of interest carried out by the two law enforcement agencies. Although these did not result in abandoning the practice of receiving donations, considerable efforts have been made to minimise corruption risks, including by adopting dedicated regulations on the matter. In addition, information on such donations appears to be made public by the Police and the SBGS. GRECO encourages the authorities to remain vigilant and mindful of potential future risks in this respect and ensure rigorous implementation of newly adopted regulations to ensure that any such risks are identified and fully taken into consideration when deciding upon whether to accept donations.
58. GRECO concludes that recommendation ix has been dealt with in a satisfactory manner.

#### **Recommendation x**

59. *GRECO recommended (i) the codes of ethics of the Lithuanian Police and the State Border Guard Service be amended in respect of integrity and situations of conflicts of interest (e.g., gifts, contacts with third parties, accessory activities etc.) and (ii) the codes be accompanied by a complementary annex with guidance and examples.*
60. The Lithuanian authorities report that on 28 December 2022 the Head of SGBS approved<sup>14</sup> the updated Code of Conduct for the Employees of the SBGS. In addition to the basic rules of conduct, the updated SBGS Code of Conduct provides employees with a number of examples and guidance on how to behave in specific situations related to ethics and integrity. Further, on 16 May 2023, the Lithuanian Police Commissioner General approved<sup>15</sup> the Code of Ethics and Anti-Corruption Behaviour of the employees

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<sup>11</sup> “On the conclusion by the commission of the evaluation of the material valuables received by the State Border Guard Service under the Ministry of the Interior of the Republic of Lithuania by way of support or for symbolic remuneration and of gifts received under an international protocol or otherwise received by the commission and approving the model form of its rules of procedure and the property valuation act”.

<sup>12</sup> <https://policija.lrv.lt/lt/administracine-informacija/ataskaitos>

<sup>13</sup> <https://vsat.lrv.lt/lt/administracine-informacija/parama-ir-dovanos>

<sup>14</sup> By the Order No 4-429 of the Head of the SBGS.

<sup>15</sup> By the Order No 5-V-411 of the Police Commissioner General.

of the Lithuanian Police. The Code of Ethics has been supplemented by an Annex entitled "Guidelines on resilience to corruption and adjustment of interests and examples of situations"<sup>16</sup>.

61. GRECO takes note with satisfaction of the concrete steps taken by the Lithuanian Police and the SBGS to further develop the respective codes of ethics/conduct applicable to their employees. These more evolved codes have been accompanied with guidance, illustrating practical situations that the officers may encounter in the performance of their duties, covering conflicts of interest, gifts and other services offered, side activities, lobbying and post-employment restrictions. Along with the examples and advice on the behaviour expected in such situations, the guidelines also indicate relevant legislation and regulations on the subject. GRECO also notes that both of these codes are mandatory, and their violation entails responsibility. GRECO encourages the Police and the SBGS to ensure a consistent and rigorous implementation of these codes in practice.
62. GRECO concludes that recommendation x has been implemented satisfactorily.

#### **Recommendation xi**

63. *GRECO recommended that a system of co-ordination be established in order to provide for more consistency between the policies and decisions of the various ethics commissions of the Lithuanian Police.*
64. The Lithuanian authorities report that in the context of the centralisation of police institutions, aimed to be completed by 1 July 2024, consideration is being given to the setting up of a Central Ethics Commission in the Police, and the establishment of police ethics commissions in five Police district boards. The Working Group<sup>17</sup> for the Implementation and Coordination of Changes Related to the Transition to a One Legal Entity in the Lithuanian Police System intends to develop and amend the relevant legal acts, as necessary. In this regard, the authorities indicate that a draft law on the centralisation of police structures has been submitted to Parliament. Further, the reorganisation and merger of county chief police commissariats and subordinating them to the Police Department under the Ministry of the Interior are also expected to contribute towards the implementation of this recommendation.
65. GRECO takes note of the information provided by the authorities. Overall, the intention to set up a Central Ethics Commission with police ethics commissions in the main Police districts has a potential to cater for the concerns underlying this recommendation, but the process is not yet under way. Important steps are in the pipeline towards the centralisation of police institutions, which is expected contribute to the consistency of decisions of ethics commissions in the Police. GRECO encourages the authorities to proceed with the reforms necessary for ensuring consistency in the policies and decisions of ethics commissions across the Police.
66. GRECO concludes that recommendation xi has not been implemented.

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<sup>16</sup> The Code of Ethics and its Guidelines are published on the official website of the Police, as follows: <https://policija.lrv.lt/lt/administracine-informacija/centrine-policijos-istaigu-darbuotoju-etikos-komisija>

<sup>17</sup> Established by the Order of the Commissioner General of the Lithuanian Police of 15 June 2022 No. 5-V-638.

## Recommendation xii

67. *GRECO recommended that a centralised mechanism be introduced for providing confidential advice to members of the Police and the State Border Guard Service on ethical and integrity matters.*
68. The Lithuanian authorities submit that the official website of the Police hosts several sections with contact information for any inquiries on prevention of corruption (to be addressed to the Corruption Prevention and Analysis Division of the Immunity Board of the Police Department), and the protection of whistleblowers<sup>18</sup>. Further, on the Intranet of the Police, the sections entitled “Coordination of Public and Private Interests” and “Conflict of Interests. Advise of the Immunity Board of the Police Department” contain contact information of the Control Division of the Police Department, as well as the section “Useful Information”, indicating the e-mail address for submitting information relating to the protection of Police employees from possible illegal influence. In addition, the SBGS introduced on its website<sup>19</sup> a reporting channel entitled “Ethics and Corruption Resilience Consultations”, which provides contact details of the Services Immunity Board for consultations. Furthermore, the authorities indicate that a system of internal reporting channels has been established by the Immunity Board, and that consultation with the Board officials can be requested by e-mail, post, telephone, online, or in person, and can be done anonymously. The officers of the Immunity Board also provide in-person training in police departments and the Lithuanian Police School on how to report violations committed by police officers. Finally, the authorities inform of the establishment of the Control Unit<sup>20</sup> tasked to work exclusively with whistleblower channels.
69. GRECO takes note of the information submitted by the authorities. The contact information for submitting inquiries on various matters, available to the employees of these two bodies, have been in place at the time of the adoption of the Evaluation Report, but were considered insufficient at the time for the purposes of confidential advice. GRECO notes with satisfaction the enhanced possibilities of reporting wrongdoings and a possibility to request consultation with the Immunity Board of the Police, including anonymously. While these measures allow seeking of advice, their primary objective appears to be facilitating the reporting of violations. From the measures described, it is not obvious that the Immunity Board may be approached for confidential advice on ethics and integrity, outside of the intention to report a wrongdoing. A centralised mechanism for confidential advice on ethics and integrity for members of the Police and the SBGS is still not in place. If providing such advice is one of the roles of the Immunity Board, this should be more clearly articulated to the Police and SBGS staff. As this matter has not been fully addressed, GRECO encourages the Lithuanian authorities to take the necessary steps without any further delay. At present, this recommendation can be considered as implemented only to some extent.

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<sup>18</sup> <https://policija.lrv.lt/lt/praneseju-apsauga-2> (Lithuanian)

<sup>19</sup> <https://vsat.lrv.lt/lt/korupcijos-prevencija/korupcijos-prevencija-1> (Lithuanian)

<sup>20</sup> As per Order No.5-V-537 of the Commissioner General of 13 July 2021 “On the Approval of the Regulations of the Immunity Board of the Police Department under the Ministry of the Interior of the Republic of Lithuania” and the provisions of the Immunity Board.

70. GRECO concludes that recommendation xii has been partly implemented.

#### **Recommendation xiii**

71. *GRECO recommended carrying out integrity checks of employees in the Police and the State Border Guard Service at regular intervals depending on their exposure to corruption risks and on the required security levels.*

72. The Lithuanian authorities report that on 17 February 2023, the Lithuanian Police Commissioner General issued the Order No 5-V-157 “On carrying out inspections of Police employees for resistance to corruption”, which establishes the periodicity of inspections. These inspections are to be carried out by the Immunity Board of the Police, in charge of defining the tasks for inspections regarding the resistance of Police employees to corruption. According to the Order, inspections will be carried out in respect of every Police employee who has not been inspected on any other grounds (e.g. promotion, security clearance etc.)<sup>21</sup> in the last three years. According to the authorities, since 13 July 2023, some 1,329 police employees have been inspected regarding their resistance to corruption. Further, on 15 May 2023 the Head of the SBGS issued the Order No 4-219<sup>22</sup>, approving the procedure which stipulates that all employees should be assessed on their resistance to corruption at least once every three years. According to the authorities, since 15 May 2023, some 993 SBGS employees have been inspected regarding their resistance to corruption.

73. GRECO takes note of the adoption of new rules and procedures establishing a requirement of inspections of the Police and the SBGS employees at regular intervals. The two orders adopted by the respective law enforcement bodies define terms used and procedures to be followed in the conduct of inspections on “resistance to corruption”. This is a step in the right direction. Nonetheless, it would appear that these procedures do not envisage triggering integrity checks for positions particularly exposed to corruption risks owing, for example, to the concentration of authority or excess of power, police work related to economic activity etc. (as pointed out in paragraph 215 of the Evaluation Report). While the introduction of regular integrity vetting of all the employees of the Police and the SBGS (at least every three years) is a welcome development, it does not fully address the concerns underlying this recommendation.

74. In view of the above, GRECO concludes that recommendation xiii has been partly implemented.

#### **Recommendation xiv**

75. *GRECO recommended that measures be taken to ensure consistency between the police institutions in respect of the policy and decisions to authorise outside activities.*

76. The Lithuanian authorities refer to the ongoing reorganisation of the Police, already mentioned in paragraph 63 above, and indicate that once this process is completed

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<sup>21</sup> As per the Description of Inspection of Persons approved by the order of the Lithuanian Police Commissioner General of 29 December 2022 No 5-V-1255 “On approval of description of procedure of inspection of persons”.

<sup>22</sup> Full title: Order No. 4-219 “On carrying out checks on the resistance to corruption of employees of the State Border Guard Service under the Ministry of the Interior of the Republic of Lithuania”.



(expected by 1 July 2024), greater uniformity will be achieved as regards policy and decisions on the authorisation of outside activities.

77. GRECO takes note of the ongoing reform in the Police and looks forward to receiving updated information of relevance to the present recommendation, i.e. demonstrating that decisions on authorisations for employees of the Police to engage in outside activities are guided by a consistent policy.
78. GRECO concludes that recommendation xiv has not been implemented.

#### **Recommendation xv**

79. *GRECO recommended establishing a more robust set of rules and guidelines on gifts and other benefits for staff of the Police and the State Border Guard Service, including an obligation to report and, as appropriate, to register gifts.*
80. The Lithuanian authorities report that on 20 February 2023, the Commissioner General of the Lithuanian Police approved (by the Order No. 5-V-161) the Gifts Policy of the Lithuanian Police, which was published on the official website<sup>23</sup> of the Police. At the same time, a Gifts Register and an Illegal Remuneration Register have been created in the Police Department Management System. The Gift Policy sets out the procedure for handing over, valuation, registration, storage and display of gifts received according to international protocol, traditions or services, as well as conduct expected of the Police employees in this regard. It applies to all Police employees, as well trainees, interns and other persons in a contractual relationship with the Police. The definition of “gifts” includes property or property right, which can be valued in money, and encompasses payments for meals, accommodation, transport etc. The Gift Policy states that police officers are not entitled to receiving or providing gifts, directly or indirectly, in the performance of their duties (Article 6), except when the value of such gifts does not exceed EUR 150, or when they are received in accordance with an international protocol, tradition, or representation. The Gift Policy also stipulates that any admissible gifts received by the Police employees must be evaluated and registered in the Gifts Register. According to the Gift Policy, anonymised information on gifts received should be made public and updated every six months. Unauthorised gifts or services should, as a rule, be refused, or if it is discovered that such gifts have been received (provided they do not amount to a bribe), they must be declared within one working day and transferred to the Police, or returned. Finally, the Appendix to the Gift Policy sets out gift acceptability evaluation criteria. Further, on 17 June 2021, the SBGS approved<sup>24</sup> the Gift Policy and the SBGS Gift Register.
81. In addition, the authorities submit that legislative amendments to the LAPPI in relation to gifts, expected to be introduced before Parliament in the course of the spring session

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<sup>23</sup> <https://policija.lrv.lt/lt/korupcijos-prevencija/kita-informacija> (in Lithuanian).

<sup>24</sup> By the Order the No. 4-206 “On the Approval of the Procedures for the Transfer, Valuation, Registration, Storage and Display of Gifts Received by the Employees of the State Border Guard Service under the Ministry of the Interior of the Republic of Lithuania in Accordance with the International Protocol or Tradition, and of Gifts Intended for the Purposes of Representation”.

of 2024 (see paragraph 36 above), would also be applicable to law enforcement agencies.

82. GRECO notes with satisfaction the new and detailed rules on gifts in the Police, which establish the principle of non-acceptance of gifts offered in the performance of official duties, provide specific exceptions on gifts that may be accepted, sets out the procedure for valuation of gifts, as well as the Register of Gifts, accessible to public. Similar rules appear to have been adopted by the SBGS. These steps are commendable, and GRECO encourages the law enforcement agencies to ensure effective implementation of these rules in practice.
83. GRECO concludes that recommendation xv has been implemented satisfactorily.

#### **Recommendation xvi**

84. *GRECO recommended developing specific policy mechanisms for preventing and managing conflicts of interest after officers leave the Police and the State Border Guard Service to work in the private sector.*
85. The Lithuanian authorities report that that the informational leaflet regarding post-employment restrictions for public servants, updated by the COEC in 2023 (see paragraph 36) is also relevant to the Police employees. The leaflet compiles the relevant provisions of the LAPPI and includes guidance and recommendations issued by COEC on restrictions applicable when terminating employment in the public sector. This information is also sent to compliance officers via the Register of Private Interests. Further, the Immunity Board of the Police prepared a “Memorandum after completion of service”, accessible to Police employees on the Intranet<sup>25</sup>. In addition, the authorities point out that the COEC shares with the competent authorities, including law enforcement agencies, information concerning previous anti-corruption and integrity-related violations by applicants for civil service posts, including previous non-compliance of applicants with post-employment restrictions.
86. GRECO takes note of the information submitted by the authorities. The various awareness raising materials regarding post-employment restrictions, developed and updated since the adoption of the Evaluation Report, are based on laws and regulations that were already in place at the time. It would appear that no new measures have been taken to introduce preventive mechanisms in respect of employees departing from the Police and the SBGS to take up employment in the private sector. GRECO recalls that possible risks of conflicts of interest and challenges to safeguarding confidentiality of information could arise in this respect (as described in paragraph 261 of the Evaluation Report). So far, no steps have been taken to remedy these risks.
87. GRECO concludes that recommendation xvi has not been implemented.

#### **Recommendation xvii**

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<sup>25</sup> <https://intranetas.policija.lt/darbui/imunitetas/atmintine-pasibaigus-valstybes-tarnybai>

88. *GRECO recommended conducting dedicated training and awareness-raising activities on whistleblowing and the protection of whistleblowers for all levels of hierarchy and chains of command in the Police and State Border Guard Service.*
89. The Lithuanian authorities report that several training activities were carried out during the reporting period, with the focus on reporting corruption by whistleblowers and their protection. By way of example, reference was made to training sessions conducted in 2022 by the Public Prosecutor's Office to the Police (13 December, with the attendance of 96 superior officials) and the SBGS (6-8 September) employees at all levels of hierarchy, which were part of the training programme entitled "Whistleblower protection in Lithuania: practical aspects of the application of the law". Further, a remote training for Police officers on the prevention of corruption, reporting of violations and other relevant themes was conducted as part of the qualification improvement programme entitled "Corruption Prevention and Official Ethics", prepared by the Immunity Board of the Police. The authorities indicate that a total of 7,754 police employees took part in training sessions in 2022, and a further 528 officers in 2023. The authorities underline that this training, re-launched in 2024 for new police employees, is intended for all police staff and that the majority of managers have successfully passed it. In addition, the sub-section of the Police Intranet "Protection of Whistleblowers" contains contact information for inquiries on this topic, and an informative memorandum was prepared for the Police employees on "Submission of information on violations in police institutions".
90. Measures to raise awareness of whistleblowing and protection of employees reporting corruption in good faith were also taken by the SBGS. In particular, the training curricula for the SBGS employees were revised to include additional material on whistleblower protection and whistleblowing. The SBGS Immunity Board officers provide annual on-the-job training to officers, which includes whistleblower protection and reporting possible violations. Such training was delivered to 880 employees in 2022 and to a further 740 officers in 2023. On 6 and 8 September 2022 the specialised remote training organised by the Prosecutor General's Office of the Republic of Lithuania (mentioned in the preceding paragraph) was attended by 49 and 47 SBGS employees respectively. As to the reporting of wrongdoings, the authorities indicate that eight such reports were received through SBGS channels in 2023, of which one was followed by formal investigation, while the other seven were not confirmed. In the Police, eight reports were received in 2022, and a further 18 reports in 2023. However, the authorities indicate that these reports did not comply with the provisions of the Law on the Protection of Whistleblowers and have been forwarded for examination in accordance with the general procedure for the examination of statements (requests, complaints).
91. As of 2021, distance trainings are organised<sup>26</sup> four times a year via the MOODLE platform for SBGS officers, which inter alia cover whistleblower protection. Some 148 officials participated in this training in 2021, 382 in 2022, and 373 in 2023. From 2023, the distance training via the MOODLE platform has been extended to career civil servants and employed staff of the SBGS. In the first half of 2023, these training sessions were attended by 118 staff members. In addition, every school year, the SBGS Immunity

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<sup>26</sup> In accordance with the Order of the Head of the SBGS No. K-929 of 7 May 2021.

Board officers give lectures on corruption prevention to SBGS School students, which also cover whistleblowing. Thus, some 199 students took part in this training in 2022 and a further 108 in 2023).

92. GRECO takes note of the efforts made by the law enforcement agencies to integrate whistleblowing and the protection of whistleblowers into training programmes and initiatives for their employees, including through their participation in sessions specifically dedicated to this topic (conducted by the Prosecutor's Office). GRECO acknowledges that considerable steps have been taken in the Police and the SBGS to raise awareness of the existing legislation on reporting corruption and the protection of whistleblowers and encourages the authorities to pursue these activities in a systematic manner. Stemming from the above, GRECO considers that the requirements of the present recommendation have been complied with.
93. GRECO concludes that recommendation xvii has been implemented satisfactorily.

### **III. CONCLUSIONS**

94. **In the light of the foregoing, GRECO concludes that Lithuania has satisfactorily implemented four of the seventeen recommendations set out in the Fifth Round Evaluation Report.** Of the remaining thirteen recommendations, seven have been partly implemented and six have not been implemented.
95. More specifically, recommendations ix, x, xv and xvii have been implemented satisfactorily, or dealt with in a satisfactory manner, recommendations i-iv, vi, xii and xiii have been partly implemented and recommendations v, vii, viii, xi, xiv and xvi have not been implemented.
96. With regard to top executive functions, guiding and information documents regarding the implementation of the Code of Conduct for State Politicians have been developed and additional efforts to raise public officials' awareness of conflicts of interest, gifts and post-employment restrictions have been made and the Chief Official Ethics Commission continued raising awareness of ethics and integrity for newly recruited public officials, including those of personal/political confidence. The newly established Compliance Department in the COEC, which includes among its tasks the verification of declarations of high-ranking officials, can have a positive effect on the overall supervision of the implementation of codes of conduct/ethics in the executive. Rules on ethics and conduct have been adopted in respect of the Chancellery of the President. However, further action is required, in particular, as regards the need to provide guidance and briefings on integrity matters for persons in top executive functions already in office, and to introduce rules on conduct/ethics applicable to the President. Further, more robust rules and practical guidance on gifts and other benefits for PTEFs are still to be established. In addition, the competences of investigating possible violations of ethics and integrity rules by PTEFs still need to be clarified so as to ensure that such investigations are carried out by an independent authority, and tangible sanctions should be introduced for any violations established. Finally, confidential counselling on ethical issues must be made available at government/ministry level and at the President's Office.

97. With regard to the law enforcement agencies, progress has been made in several areas. Regulations and practice regarding the receipt of donations by the Police and the State Border Guard Service were analysed and more detailed rules on assessing, acceptance/refusal and accounting for donations received have been set up. Codes of ethics of the two law enforcement agencies have been updated and guiding documents with practical examples of the implementation of these codes have been approved in this regard. In addition, detailed policies and rules on refusal/acceptance of gifts, their valuation and registration have been approved for the Police and the SBGS and training and awareness-raising on the protection of whistleblowers has been consistently provided to employees of both law enforcement agencies. That said, several important recommendations still need to be addressed, such as ensuring consistency of policies and decisions of the various Police ethics commissions, as well as consistency regarding authorisations for outside activities. Law enforcement agencies should also proceed with the setting up of a centralised mechanism for providing confidential advice to their employees, and establish clear rules, guidance and preventive measures to avoid possible conflicts of interest in respect of departing officers who intend to take up employment in the private sector.
98. In the light of the foregoing, GRECO notes that further progress will need to be made within the next 18 months to achieve an adequate level of compliance with the recommendations. In accordance with Rule 31 revised bis, paragraph 8.2, of its Rules of Procedure, GRECO calls on the head of the delegation of Lithuania to submit additional information with regard to the implementation of recommendations by 30 September 2025.
99. GRECO invites the authorities of Lithuania to authorise the publication of this report at their earliest convenience and make it public.