

## FIFTH EVALUATION ROUND

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

## ADDENDUM TO THE SECOND COMPLIANCE REPORT

# CROATIA



Adopted by GRECO  
at its 101<sup>st</sup> Plenary Meeting (Strasbourg, 18-21 November 2025)

## **I. INTRODUCTION**

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies".
2. This [Addendum to the Second Compliance Report](#) assesses the measures taken by the authorities of Croatia to implement the recommendations issued in the [Fifth Round Evaluation Report on Croatia](#) which was adopted at GRECO's 84<sup>th</sup> Plenary Meeting (2-6 December 2019) and made public on 24 March 2020, following authorisation by Croatia. The corresponding [Compliance Report](#) was adopted by GRECO at its 89<sup>th</sup> Plenary Meeting (3 December 2021) and made public 22 December 2021, following authorisation by Croatia. The [Second Compliance Report](#) was adopted by GRECO at its 96<sup>th</sup> Plenary Meeting (22 March 2024) and made public on 24 June 2024, following authorisation by Croatia.
3. As required by GRECO's Rules of Procedure,<sup>1</sup> the authorities of Croatia submitted a Situation Report on measures taken to implement the recommendations. This report was received on 24 June 2025 and served as a basis for the Addendum to the Second Compliance Report.
4. GRECO selected Cyprus (with respect to top executive functions in central governments) and Georgia (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The rapporteurs appointed were Alexia Kalispera on behalf of Cyprus, and Giorgi Bagdavadze on behalf of Georgia. They were assisted by GRECO's Secretariat in drawing up the Addendum to the Second Compliance Report.

## **II. ANALYSIS**

5. GRECO addressed 17 recommendations to Croatia in its Evaluation Report. In the Second Compliance Report, GRECO concluded that recommendations iv, vi, viii, ix, xi and xv had been implemented satisfactorily, recommendations i, ii, iii, v, vii, x, xii, xiii, xiv, xvi and xvii had been partly implemented. Compliance with the outstanding recommendations is examined below.

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

### **Recommendation i**

6. *GRECO recommended that the legal status, recruitment and obligations of special advisers and others working in an advisory capacity for the government be regulated, ensuring that they undergo an integrity check upon selection, that their names, functions and possible remuneration (for the tasks they carry out for the government) are made*

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<sup>1</sup> The Compliance procedure of GRECO's Fifth Evaluation Round is governed by its Rules of Procedure, as amended: Rule 31 revised bis and Rule 32 revised bis.

*public and that appropriate regulations on conflicts of interest and use of confidential information apply to them.*

7. GRECO recalls that this recommendation was assessed as partly implemented in the Second Compliance Report. GRECO acknowledged that the special advisers had been appointed in accordance with the specified selection criteria, and that they had been required to sign a declaration of interests and impartiality upon appointment containing certain obligations. GRECO also welcomed the publication of the advisers' names online. However, for this recommendation to be fully implemented, GRECO concluded that integrity checks were lacking.
8. The Croatian authorities indicate that the Declaration of Interests and Impartiality, which special advisers are to sign, to disclose details relevant to preventing conflicts of interest, is intended to ensure their integrity (see paragraph 10 of the Second Compliance Report), and is therefore sufficient for integrity check purposes. The authorities further emphasise that special advisers do not have executive powers: they are not state officials or civil servants employed by the government or ministries. They are not in a position to make decisions, give orders or manage any part of the state administration either. They work under service contracts and have no fixed working hours. Many of them work without remuneration, as they have other full-time jobs. For these reasons, integrity checks are neither necessary nor feasible. Moreover, it is unclear how any such checks should be conducted.
9. GRECO takes note of these arguments and recalls that they were already addressed at the evaluation and earlier compliance stages. In particular, GRECO noted the potential for conflicts of interest among individuals working in an unpaid advisory capacity for the government (see paragraphs 28–29 of the Evaluation Report and footnote 23). In the Second Compliance Report (paragraph 11), GRECO noted that submitting the declaration of interests could serve as a basis for conducting integrity checks, but that no measures had been taken to carry them out, and this remains the case. Without any new development in this area, the recommendation can only be considered partly implemented.
10. GRECO concludes that recommendation i remains partly implemented.

### **Recommendation ii**

11. *GRECO recommended that (i) that a code of conduct for persons with top executive functions be adopted, complemented with clear guidance regarding conflicts of interest and other integrity-related matters (e.g. gifts, outside activities, third party contacts, post-employment restrictions, financial declarations, handling of confidential information etc.) and (ii) that such a code be coupled with a mechanism of supervision and enforcement.*
12. GRECO recalls that this recommendation was assessed as partly implemented. GRECO welcomed the adoption of a Code of Conduct in respect of persons with top executive functions (PTEFs), as well as the setting up of a Council for the Implementation of the Code of Conduct for State Officials in the Executive Bodies to supervise its compliance

and application (the Implementation Council). For the first part of the recommendation to be considered fully implemented, GRECO invited the authorities to complement the Code of Conduct with clear guidance. As regards the second part of the recommendation, given the recent establishment and constitution of the Implementation Council, GRECO preferred to assess its supervision and enforcement activities at a later stage.

13. The Croatian authorities inform GRECO that in 2023-2025, the Implementation Council held ten sessions. These sessions covered the adoption of the Council's Rules of Procedure, the coordination and discussion of educational activities, and the examination of individual cases, such as complaints filed by civil servants against state officials and investigations into whether state officials' conduct complies with the Code's provisions<sup>2</sup>. The Council also published two press releases on the occasion of the International Anti-Corruption Day, emphasising the principles enshrined in the Code of Conduct<sup>3</sup>. In addition, it conducted several educational activities (see paragraph 20 below).
14. Regarding the second part of the recommendation, the authorities indicate that the Code of Conduct does not provide for sanctions in the event of violations of its provisions. However, Article 29 of the Code of Conduct provides for the possibility of requesting an opinion from the Implementation Council on whether a given conduct constitutes a breach of the Code's provisions. This opinion may be requested by the relevant officials, their immediate superiors, or the Office of the Prime Minister of the Republic of Croatia. The opinion provides an overview of the applicable provisions, an assessment of the situation, and a finding as to whether a breach has occurred. If a breach is found, the opinion will also contain a recommendation on how to bring the conduct into conformity with the Code. In such cases, the Implementation Council's opinion, together with any dissenting opinions, is sent to the executive authority of the relevant official and the government. To date, the Implementation Council has found a breach of the Code of Conduct in three cases. In two of these cases, no further action was taken against the officials concerned as the breaches were not considered severe. The third case, which concerned a situation that could be perceived as posing a risk of conflict of interest, was referred to the Commission for the Prevention of Conflicts of Interest. The authorities clarify that the Implementation Council is a preventive and advisory body that does not impose any sanctions. Its opinions aim to enable the official in question to avoid breaches of the Code in future. At the same time, the Implementation Council cooperates closely with the Commission for the Prevention of Conflicts of Interest, which has the power to impose sanctions. Other tasks of the Implementation Council include providing confidential advice, training and educational support; issuing general guidelines on the application of the Code of Conduct; promoting ethical standards; and monitoring the application of regulations in the field of combating corruption and ethics.

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<sup>2</sup> [Ministarstvo pravosuđa i uprave Republike Hrvatske - Sjednice Vijeća za Kodeks](#)

<sup>3</sup> These press releases are available at the following links: [2023 statement](#), [2024 statement](#).

15. GRECO takes note of this information. Regarding the first part of the recommendation, GRECO acknowledges various training activities of the Implementation Council (they will be assessed under recommendation iii below). It does not appear, however, that the requisite document providing practical guidance on the above Code of Conduct has been developed. Indeed, the Evaluation Report emphasises the need for a “detailed guidance containing concrete examples connected to government work” (paragraph 41).
16. As for the second part of the recommendation, GRECO observes that the Code of Conduct for PTEFs does not provide for a sanctioning mechanism. Opinions of the Implementation Council that a breach of the Code of Conduct has occurred are forwarded to the relevant official's executive authority and the government. Any action taken in response to these opinions is therefore at the discretion of the aforementioned authorities. There is a complete lack of clarity and transparency regarding any sanctions or corrective measures applied in the event of a breach. GRECO considers this situation to be unsatisfactory from the perspective of the relevant official and the effective implementation of the rules of conduct. GRECO has emphasised, in paragraph 41 of the Evaluation Report, that it is « important to hold PTEFs to account in case of breach of these standards to ensure their effectiveness. Such a code would thus need to be coupled with some form of enforcement, in line with GRECO's standard practice.” The authorities may therefore consider indicating the corrective measures that may be applied to an official who has breached the Code, either in the Code of Conduct or in related practical guidance. GRECO further notes that some of the Implementation Council's opinions can be referred to the Commission for the Prevention of Conflicts of Interest, which will impose a sanction if appropriate. However, GRECO recalls that it has previously criticised the sanctioning mechanism under the Law on the Prevention of Conflicts of Interest (see paragraphs 92–94 of the Evaluation Report). These shortcomings have not yet been addressed (see recommendation x below). GRECO can therefore only conclude that the second part of this recommendation remains partly implemented.
17. GRECO concludes that recommendation ii remains partly implemented.

### **Recommendation iii**

18. *GRECO recommended that: (i) systemic briefings on integrity issues be imparted to persons with top executive functions upon taking up their positions and at certain intervals thereafter and (ii) confidential counselling on integrity issues be established for them.*
19. GRECO recalls that that this recommendation was assessed as partly implemented. GRECO acknowledged several information meetings held with top executives. In order to regard the first part of the recommendation as fully implemented, such briefings needed to be organised systematically. As regards the second part of the recommendation, GRECO had misgivings about the conflation of roles entrusted to the Implementation Council, which, in addition to giving confidential counselling to PTEFs, is responsible for the supervision and enforcement of the Code of Conduct. In GRECO's view, the tasks and role of the Implementation Council had to be revised.

20. Regarding the first part of the recommendation, the Croatian authorities inform GRECO that in 2023-2025, the Implementation Council conducted seven educational activities dedicated to the Code of Conduct and targeting all state officials in executive bodies. A total of 103 officials have participated. Further planned activities include a joint training session with the Council and the Commission for the Resolution of Conflicts of Interest featuring a presentation of the Lobbying Act, as well as thematic training sessions. The Implementation Council intends to maintain the current dynamics of at least two training cycles per year. The training programme covers the following topics: ethics and integrity of state officials; corruption prevention policy; conflict of interest prevention; transparency and access to information; fiscal responsibility; corruption crimes; lobbying; whistleblower protection; public procurement; media and citizen relations. The Implementation Council keeps track of newly appointed officials and organises briefings and training sessions accordingly. A questionnaire is currently being conducted to determine state officials' preferences regarding which training courses they consider primary for their job. Such courses will then be organized.
21. As regards the second part of the recommendation, the authorities emphasise that members of the Implementation Council are appointed based on their skills, experience, professional qualities and impeccable professional conduct. Additionally, members of the Council are required to recuse themselves from decision-making in situations where they find themselves partial. In particular, Article 28, paragraph 2 of the Code of Conduct stipulates: "In the case when the Council considers a case related to a member of the Council from the ranks of state officials, the state official shall be exempted from deliberation and decision-making in the capacity of a member of the Council."
22. GRECO takes note of these submissions. GRECO is satisfied with the scope and regularity of the training activities of the Implementation Council and considers the first part of the recommendation to be fully implemented. As for the second part of the recommendation, GRECO reiterates its consistent position that it is not appropriate to attribute counselling function to a body responsible for investigating misconduct and enforcing the rules of conduct, as this may have a chilling effect. Given the supervisory functions of the Implementation Council, PTEFs may well avoid seeking advice from it when faced with an ethical dilemma, for fear of subsequent action against them. GRECO underlines that the element of trust is crucial for an advisory mechanism.
23. GRECO concludes that recommendation iii remains partly implemented.

### **Recommendation v**

24. *GRECO recommended that (i) rules be introduced on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties who seek to influence governmental legislative and other activities; and (ii) sufficient information about the purpose of these contacts be disclosed, such as 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.*

25. GRECO recalls that that this recommendation was assessed as partly implemented. The Lobbying Act was passed on 14 March 2024. Acknowledging this positive development, GRECO concluded that the first part of the recommendation would be considered to have been dealt with in a satisfactory manner upon the entry into force of this law. As regards the second part of the recommendation, GRECO expressed concern that the Code of Conduct for PTEFs leaves PTEFs with a broad margin of discretion, requiring them to disclose to the public only "important" meetings with third parties. GRECO therefore advocated for the disclosure of *all* meetings between PTEFs and lobbyists, inviting the authorities to demonstrate that such meetings were effectively disclosed to the public.

26. The Croatian authorities submit that the Lobbying Act came into force on 1 October 2024. The Act primarily governs the activities of lobbyists and establishes a public register of lobbyists. The Commission for the Resolution of Conflicts of Interest (the Commission) has been designated as the competent body responsible for implementing the law, overseeing lobbying activities, and maintaining the register of lobbyists (hosted on a dedicated electronic platform). Alongside the provisions of the Code of Conduct for PTEFs, the Act introduces certain obligations regarding how persons with top executive functions should engage with lobbyists. These include the obligation to refuse further communication with lobbyists on matters contrary to constitutional principles or public interests, the obligation to avoid conflicts of interest, a ban on lobbying while in office, and the obligation not to engage in lobbying activities in the same area for 18 months after leaving office.

27. As regards the disclosure of contacts with lobbyists, the authorities indicate that Article 18 of the Code of Conduct for PTEFs requires the public to be informed of important meetings via the official websites of the relevant authorities or through social media. Article 19 of the Code requires the publication of information on official travel. The authorities also refer to the Right to Access Information Act provisions, which require public authorities to publish information about their activities on their official websites, as well as appointing a dedicated officer to handle information requests.

28. As regards the awareness-raising in this area, the Ministry of Justice, Public Administration and Digital Transformation produced a Lobbying Guide<sup>4</sup> and created a dedicated "Lobbying" section on its official website<sup>5</sup>. Specific training sessions are planned for potential targets of lobbying and prospective lobbyists. Four roundtables were held for holders of executive and legislative power at the local and regional levels.

29. GRECO takes note of this information and welcomes the entry into force of the Lobbying Act. Having regard to the obligations imposed on PTEFs in this area under the above Act and the Code of Conduct, GRECO considers that the first part of the recommendation has been complied with. As regards the second part of the recommendation, however, GRECO notes that the applicable rules and related materials do not provide any guidance on the scope of information that PTEFs should disclose about their meetings with

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<sup>4</sup>[https://mpudt.gov.hr/UserDocsImages//slike/Istaknute%20teme/Lobiranje//Lobiranje%20-%20vodi%C4%8D\\_eng.pdf](https://mpudt.gov.hr/UserDocsImages//slike/Istaknute%20teme/Lobiranje//Lobiranje%20-%20vodi%C4%8D_eng.pdf)

<sup>5</sup><https://mpudt.gov.hr/lobbying/28246>

lobbyists. Nor do they provide any criteria for determining which meetings are sufficiently important for disclosure purposes. Nevertheless, GRECO reiterates the importance of disclosing all meetings for greater transparency<sup>6</sup>, especially as the register contains data on the lobbyists and not on the meetings that took place. Moreover, while lobbyists are required to report annually to the Commission on their activities, including who they meet, these reports will not be made public. Finally, the authorities do not provide any examples of the publication of such information on the official websites of the relevant authorities or elsewhere. This part of the recommendation is therefore considered to be partly implemented.

30. GRECO concludes that recommendation v remains partly implemented.

### **Recommendation vii**

31. *GRECO recommended that post-employment restrictions be broadened in scope in respect of persons with top executive functions.*
32. GRECO recalls that this recommendation was assessed as partly implemented. The Prevention of Conflicts of Interest Act and the new law on lobbying extended the cooling-off period, before persons with top executive function accept employment in the private sector, to 18 months<sup>7</sup>. While welcoming this development, GRECO observed, however, that such post-employment restriction was limited only to managerial positions and was not extended to employment in other positions (e.g. of an advisory nature). In addition, the scope of the restriction remained the same as described in paragraph 78 of the Evaluation Report, i.e. employment was restricted to legal entities with which the public authority, where the public officeholders served, had a business relationship or exercised supervisory functions over it during their term of office.
33. The Croatian authorities report that no further legislative changes have been made. However, additional efforts have been made to raise awareness for the addressees of the Prevention of Conflicts of Interest Act. In particular, the Commission produced a Guide, which was recently updated to include examples drawn from the Commission practice. In 2022-2024, a total of 40 training courses were held for all categories of officials; 42 courses are planned for 2025-2027.
34. GRECO takes note of this information and welcomes the additional guidance developed on post-employment restrictions, including drawing on the Commission's practice. GRECO, however, notes that the scope of post-employment restrictions remains the

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<sup>6</sup> The OECD guidelines on lobbying, as revised in 2024, recommend making publicly available online and easily accessible, in an open data format that is reusable for public scrutiny, timely, comprehensive and detailed information on all lobbying activities. See also [EC Rule of Law Report \(2024\)](#), p.18, footnote 114, and [EC Rule of Law Report \(2025\)](#), p.10

<sup>7</sup> Article 23 of the Prevention of Conflicts of Interest Act provides that a public officeholder must not accept appointment to management positions in a legal entity with which the public authority in which the public officeholders held office had a business relationship or conducted supervisory functions over it during their term of office, unless otherwise prescribed by a special law. This restriction will apply for 18 months after the termination of office. In addition, the legal entity must not appoint or employ the public officeholder within the same timeframe.

same as assessed previously. GRECO regrets that its concerns expressed in the Evaluation and the Second Compliance Report (see paragraph 32 above) have not been addressed.

35. GRECO concludes that recommendation vii remains partly implemented.

#### **Recommendation x**

36. *GRECO recommended that (i) the available sanctions for violations of the Law on the Prevention of Conflicts of Interest be reviewed, to ensure that all violations of the Law have proper consequences and (ii) the proportionality of sanctions under the Law be clarified.*
37. GRECO recalls that that this recommendation was assessed as partly implemented. GRECO considered that the first part of the recommendation had been complied with in so far as sanctions had been introduced for breaches of all substantial provisions of the Prevention of Conflicts of Interest Act. However, GRECO found the second part of the recommendation to be not implemented, as the proportionality of sanctions under the law still needed clarifying. In the first place, the law did not lay down an appropriate/adequate scale of sanctions for breaches of its statutory provisions (other than admonition and fine, as provided under the previous law which had been examined in the Evaluation Report). Secondly, the law – or any guidance or practice adopted by the Commission - did not provide criteria of “minor” or “serious” violations that would determine which sanction to impose. Thirdly, GRECO considered that the minimum fine to be imposed on the head of a public authority for failure to cooperate with the Commission (approx. 265 euros) was inadequate.
38. The Croatian authorities report that no further legislative changes have been introduced. However, additional efforts have been undertaken as regards the awareness raising for the addressees of the Prevention of Conflicts of Interest Act (see paragraph 33 above).
39. GRECO takes note of this information and regrets that its concerns regarding the proportionality of sanctions, expressed in the Evaluation and the Second Compliance Report (see paragraph 37 above), have not been addressed.
40. GRECO concludes that recommendation x remains partly implemented

*Regarding law enforcement agencies (Police and Border Guard)*

#### **Recommendation xii**

41. *GRECO recommended (i) the practice of paying fines directly in cash to police officers be abandoned and (ii) a comprehensive risk assessment of corruption prone areas and activities be undertaken in the police, to identify problems and emerging trends, and that*

*the data is used for the pro-active design of an integrity and anti-corruption strategy for the police.*

42. GRECO recalls that this recommendation was assessed as partly implemented. GRECO considered that the first part of the recommendation had been complied with, given that the practice of paying fines directly in cash to police officers had been discontinued. The second part of the recommendation was considered partly implemented as the authorities were still in the process of conducting a comprehensive risk assessment using various sources and other measures to identify risks and corruption-prone areas in the Police.
43. The Croatian authorities report that, in March 2025, and in accordance with the Action Plan 2025-2027 accompanying the Anti-Corruption Strategy 2021-2030, the General Police Directorate finalised and adopted the Risk Assessment of police corruption-prone areas and activities and Plan of measures for strengthening police integrity and for preventing and combating police corruption. The document contains an analysis of statistical and analytical data on criminal charges against police staff, among other things. It concludes that the posts with the highest risk of corruption offences during the observed period were the lowest paid and those involving direct or indirect contact with financial resources. The document also identifies the following risks: abuse of power and authority; bribery; influence peddling; misuse of official data and information; and criminal association in the context of police corruption. It also sets out specific measures to address these risks, including periodic risk assessments of corruption-prone areas, new training programmes, the implementation of an internal reporting mechanism, the amendment of legal standards relating to mandatory reporting, the implementation of an entry/exit system for registering third-country nationals, the mandatory wearing of body-worn cameras and pre-employment integrity checks. The implementing entities, methods of implementation, and time limits are also indicated.
44. GRECO welcomes the adoption of the aforementioned Plan of measures to strengthen police integrity and prevent and combat police corruption. The plan is based on a thorough and comprehensive risk assessment, and the measures it proposes are relevant and specific. They also reflect many of GRECO's long-standing recommendations.
45. GRECO concludes that recommendation xii has been implemented satisfactorily.

### **Recommendation xiii**

46. *GRECO recommended that (i) the Code of Ethics for Police Officers is updated and covers in detail all relevant integrity matters (such as conflict of interest, gifts, contacts with third parties, outside activities, the handling of confidential information), supplemented with a manual or handbook illustrating all issues and risk areas with concrete examples; (ii) the Code of Ethics be made known to the public.*
47. GRECO recalls that this recommendation was assessed as partly implemented. While the Code of Ethics for Police Officers had been adopted, it lacked practical guidance with

concrete examples. The first part of the recommendation was therefore considered partly implemented. As the above Code of Ethics was published in the Official Gazette and on the institutional websites, the second part of the recommendation was assessed as fully implemented.

48. The Croatian authorities report that the Ministry of the Interior has published a Manual of Ethical Behaviour for Police Officers on its website<sup>8</sup>. The manual covers areas such as receiving gifts and services, relations with third parties and conflicts of interest. It also draws attention to the confidentiality and secrecy of data available to police officers and the inappropriateness of using one's official capacity and public resources for private purposes. All police officers have received the manual via email. It is used in all forms of police officer professional development. Furthermore, under the new Plan of Measures (see Recommendation xii above), it is intended to incorporate it into the induction course and disseminate it to all police staff twice a year.
49. GRECO welcomes the publication of the aforementioned manual to accompany the code of conduct for police officers, as well as the authorities' commitment to disseminating it regularly through training and other activities. GRECO encourages the authorities to enrich the manual with additional, more concrete real-life examples, as implementation practices evolve.
50. GRECO concludes that recommendation xiii has been implemented satisfactorily.

#### **Recommendation xiv**

51. *GRECO recommended that both the initial and in-service training of police officers on ethics and integrity matters be considerably enhanced, taking into consideration the specificity of their duties and vulnerabilities, as provided in a future code of conduct or ethics.*
52. GRECO recalls that this recommendation was assessed as partly implemented. GRECO took note of the authorities' intention to base the future initial and in-service training of police officers on the new Code of Ethics, and the yet-to-be-developed practical handbook, as well as on the planned risk assessment of areas and activities within the police that are prone to corruption (see recommendations xii and xiii above).
53. The Croatian authorities now report that a practical manual to accompany the Code of Conduct has been developed and incorporated into in-service training programmes and the Police Academy curriculum. Furthermore, induction and in-service training has been adapted to reflect the findings and conclusions of the comprehensive risk assessment.
54. GRECO is satisfied that initial and in-service integrity training is now practice-oriented and tailored to identified corruption risks.
55. GRECO concludes that recommendation xiv has been implemented satisfactorily.

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<sup>8</sup> <https://mup.gov.hr/gradjani-281562/prituzbe/eticki-kodeks-policijna-sluzbenika-290138/290138>

### **Recommendation xvi**

56. *GRECO recommended that a study be conducted concerning the activities of police officers after they leave the police and that, if necessary, in light of the findings of this study, rules be adopted to ensure transparency and limit the risks of conflicts of interest.*
57. GRECO recalls that this recommendation was assessed as partly implemented. GRECO noted that the University of Applied Sciences in Criminal Investigation, in cooperation with the Human Resources Department and the General Police Directorate, had been working on a study on the activities of police officers after they leave the police.
58. The Croatian authorities now submit the text of the study entitled “The Employment Activities of Police Officers After Leaving the Police Force”, which was completed in November 2024. It will be published in the Police and Security Journal, which is issued by the Ministry of the Interior, in 2025. The study examines the proportion of police officers employed by other employers after leaving the police force between 2021 and 2024, as well as the employment of former police officers by companies that are the Ministry of the Interior's largest suppliers and other business entities during this period. It also contains an analysis of complaints reporting irregularities in police officers' work after they left the service, as well as an overview of criminal offences committed by police officers for the benefit of external business entities. No systematic tendencies indicating the employment of ex-police officers to exploit data collected during their time in law enforcement for the benefit of a new employer doing business with the Ministry of the Interior have been observed. No data were found to suggest an increased risk of conflict of interest that would require the systematic regulation of this area or the introduction of monitoring or approval for the future employment of all ex-police officers. Overall, the results of the analysis show that it would be sufficient to draw attention to potential risks in the post-employment context during appropriate educational activities, and that further research in this area is useful.
59. GRECO acknowledges that the study on the post-employment activities of police officers has been finalised and is scheduled for publication in 2025. GRECO notes that the study recommends raising awareness rather than introducing regulations in this area. GRECO also acknowledges that the training programme for police officers has recently been updated to include the new practical manual that accompanies the Code of Conduct, as well as the findings of the recent comprehensive risk analysis (see recommendation xiv above). GRECO trusts that post-employment issues will be included in the relevant training for all police officers.
60. GRECO concludes that recommendation xvi has been implemented satisfactorily.

### **Recommendation xvii**

61. *GRECO recommended that a requirement be established for police staff to report integrity related misconduct they come across in the service.*

62. GRECO recalls that this recommendation was assessed as partly implemented. GRECO recognised the efforts made by the authorities to implement this recommendation. Notably, the new Civil Service Act had introduced an obligation for civil servants to report integrity-related misconduct, which was also applicable to police officers. Furthermore, plans were in place to amend the Police Act to explicitly require police officers to report behaviour that violates integrity. GRECO awaited further developments in this area.
63. The Croatian authorities report that the new practical manual accompanying the Code of Conduct emphasises the obligation of police officers, as required by the Civil Service Act, to report any integrity violations they detect while performing their duties. Furthermore, on 28 October 2024, the Minister of the Interior set up a working group to prepare draft amendments to the Police Act. One of the proposals is to amend Article 93 of the Police Act, to reflect the specific obligation under the Civil Service Act to report integrity violations, by adding the following provision: "A police officer who, in the course of performing their duties, becomes aware of a possible breach of official duty committed by another police officer is obliged to report it to the competent superior officer." The working group is currently finalising a draft proposal of all the amendments to the Police Act. This will then be submitted for further processing in accordance with the prescribed legislative procedure. In addition, the authorities refer to the complaints mechanism relating to the protection of the dignity of civil servants under the 2022 Collective Agreement for Civil Servants and Employees. They also point to police officers' statutory obligation to report criminal offences and misdemeanours, as well as to collect information on harmful phenomena, which may include information on the corrupt or otherwise inappropriate behaviour of fellow officers.
64. GRECO welcomes that the new practical manual of the Code of Conduct draws attention to police officers' obligation to report integrity related breaches under the Civil Service Act. GRECO also notes that the authorities are considering introducing a specific provision in future amendments to the Police Act to further reaffirm this obligation. The authorities may wish to keep GRECO informed of any new developments in this respect.
65. GRECO concludes that recommendation xvii has been implemented satisfactorily.

### **III. CONCLUSIONS**

66. **In view of the foregoing, GRECO concludes that Croatia has implemented satisfactorily or dealt with in a satisfactory manner eleven of the seventeen recommendations contained in the Fifth Round Evaluation Report.** The remaining six recommendations have been partly implemented.
67. More specifically, recommendations iv, vi, viii, ix, xi-xvii have been implemented satisfactorily, recommendations i, ii, iii, v, vii and x have been partly implemented.
68. With respect to top executive functions, GRECO appreciates the training activities conducted by the Implementation Council and welcomes the entry into force of the Lobbying Act. The latter Act and the new Code of Conduct for State Officials in the

Executive Bodies introduce certain rules on how persons with top executive functions are to engage with lobbyists and third parties who seek to influence governmental legislative and other activities. That said, more determined efforts are required to implement certain outstanding recommendations relating, in particular, to the need: to carry out the integrity vetting of special advisers; to disclose sufficient information about meetings that persons with top executive functions have with lobbyists and third parties to the public; to broaden the scope of post-employment restrictions applicable to persons with top executive function; to clarify the proportionality of sanctions for violations under the Prevention of Conflicts of Interest Act; and to ensure that the recently adopted Code of Conduct is accompanied with appropriate guidance and enforcement, and that counselling mechanisms are devoid of chilling effect.

69. As regards law enforcement, there has been significant progress in most outstanding issues. A comprehensive risk assessment of police corruption-prone areas and activities has been conducted and the Plan of measures for strengthening police integrity and for preventing and combating police corruption has been adopted. A Manual of Ethical Behaviour for Police Officers accompanying the relevant code of conduct has been published. The initial and in-service integrity training has been developed to become more practice-oriented and tailored to identified corruption risks. The study on the post-employment activities of police officers has been finalised. Police officers, like other civil servants, are required to report integrity-related misconduct.
70. In view of the above, GRECO concludes that Croatia is not in sufficient compliance with the recommendations contained in the Fifth Round Evaluation Report within the meaning of Rule 31 revised *bis*, paragraph 10 of the Rules of Procedure. GRECO therefore decides to apply Rule 32 revised, paragraph 2 (i) and asks the Head of delegation of Croatia to provide a report on the progress in implementing the outstanding recommendations (i.e. recommendations i, ii, iii, v, vii and x) by 30 November 2026.
71. In addition, in accordance with Rule 32 revised, paragraph 2, sub-paragraph (ii.c), GRECO invites the Secretary General of the Council of Europe to send a letter – with a copy to the Head of delegation of Croatia – to the Minister of Foreign Affairs of Croatia, drawing attention to the non-compliance with the relevant recommendations and the need to take determined action with a view to achieving further tangible progress as soon as possible.
72. Finally, GRECO invites the authorities of Croatia to authorise, as soon as possible, the publication of the report, to translate it into the national language and to make the translation public.