

FIFTH EVALUATION ROUND

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

ADDENDUM TO THE SECOND COMPLIANCE REPORT

FRANCE



Adopted by GRECO
at its 101st plenary meeting (Strasbourg, 18-21 November 2025)

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 Addendum to the Second Compliance Report assesses the measures taken by the French authorities to implement the recommendations made in the Fifth Round Evaluation Report on France which was adopted by GRECO at its 84th plenary meeting (6 December 2019) and made public on 9 January 2020, following authorisation by France. The corresponding Compliance Report was adopted at GRECO's 89th Plenary Meeting (3 December 2021) and made public on 7 January 2022, following authorisation by France. The Second Compliance Report was adopted by GRECO at its 96th Plenary Meeting (22 March 2024) and made public on 10 April 2024, following authorisation by France.
3. As required by GRECO's Rules of Procedure,¹ the French authorities submitted a situation report containing information on measures taken to implement the recommendations. That report was received on 7 July 2025 and, together with information supplied subsequently, served as the basis for this Addendum to the Second Compliance Report.
4. GRECO selected Belgium (in respect of top executive functions in central governments) and the Republic of Moldova (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed – Ms Sophie MORIS for Belgium and Mr Alexandru CLADCO for the Republic of Moldova – were assisted by the GRECO Secretariat in drawing up this report.

II. ANALYSIS

5. GRECO made 18 recommendations to France in its Evaluation Report. In the Second Compliance Report, GRECO concluded that recommendations iii and xv had been implemented satisfactorily or dealt with in a satisfactory manner, recommendations i, ii, iv, v, vii, xii to xiv, xvii and xviii had been partly implemented and recommendations vi, viii to xi and xvi had not been 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 requirement of prior integrity checks for all posts of adviser to the Government or the President of the Republic, carried out as part of the selection process and with the support of the High Authority for Transparency in Public Life, be provided for by law.*

¹ 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.

7. GRECO recalls that this recommendation was considered partly implemented in previous reports. GRECO noted with satisfaction that HATVP's prior vetting of the appointments of members of ministers' private offices and staff of the President of the Republic had been effective. However, the vetting of persons considered for such employment was only carried out when they had worked in the private sector within the previous three years. GRECO took note of the arguments put forward by the authorities to the effect that integrity-related risks were lower for advisers from the public sector, as they were already subject to ethical obligations. As regards the declaration of interests to be submitted by each adviser, GRECO noted that this was only an *ex post facto* control once the person had been appointed and therefore did not meet the objective of the recommendation. GRECO referred to the Evaluation Report, which stressed the need for the HATVP to screen all candidates for posts of adviser to the Government or the President of the Republic from both the private and public sectors, given the increased mobility between sectors.
8. The French authorities reiterate that Decree No. 2020-69 of 30 January 2020, which sets out the screening process for members of ministers' private offices and staff of the President of the Republic, provides for the prior vetting of such appointments by the HATVP as a preventive measure for candidates who have worked in the private sector within the previous three years. The purpose of prior vetting for public service appointments is to mitigate the criminal law and professional conduct risks associated with movement between the public and private sectors. Moving from one administration to another does not, in itself, put public officials at risk of committing the criminal offence of benefiting from a conflict of interest, as set out in both Articles 432-12 and 432-13 of the French Criminal Code. Consequently, the authorities assert that vetting is unnecessary in such cases.
9. Regarding professional conduct risks, the authorities point out that the HATVP vets advisers from the private sector as the gainful professional activities in which they were previously engaged could potentially interfere with the performance of their public duties and compromise the proper running, independence or neutrality of the public service. Due to their previous roles, members of ministers' private offices and staff of the President of the Republic from the public sector are already subject to the ethical obligations applicable to any public servant or official. In accordance with Articles L121-1 and L121-4 of the General Civil Service Code, they must carry out their duties with dignity, impartiality, integrity and probity, and must avoid any conflict of interest. The HATVP's focus on vetting advisers to the Government or presidential staff from the private sector is therefore justified by these requirements.
10. The authorities explain that the HATVP assesses the professional conduct and criminal law risk among members of ministers' private offices and staff of the President of the Republic who have recently worked in the private sector. It has 15 days to issue an opinion of compatibility, compatibility with reservations or incompatibility. In 2024, the HATVP issued 293 opinions on proposed appointments of members of ministers' private offices and staff of the President of the Republic, compared with 251 in 2023 and 230 in 2022. Excluding cases of inadmissibility, lack of competence and instances where no decision was required, 71.3% of these opinions were for compatibility with reservations,

while 28.7% were for compatibility. These recommendations are supplemented by extensive checks of declarations of interest, which members of ministers' private offices and staff of the President of the Republic must submit within two months of taking office, regardless of whether they come from the private or public sector. These extensive checks cover the completeness, accuracy and sincerity of the declaration. They are a means of detecting risks of conflict of interest and may give grounds for additional mitigation measures, including in relation to the interests of spouses.

11. In 2024, the HATVP requested that 51 advisers to the Government and members of staff working for the President of the Republic take mitigation measures after checking their declarations of interest. The resignation and formation of three new governments that year meant that the HATVP was exceptionally busy. The sheer volume of checks to be carried out, concentrated within a short timeframe, required a considerable amount of effort from the staff involved. In addition to the rationale behind the current arrangements, whereby the assessment focuses on the risks arising from positions held in the private sector prior to appointment, the authorities assert that the HATVP's limited human and budgetary resources would not permit the extension of prior vetting to all appointees from the public sector.
12. GRECO takes note of the explanations and clarifications provided by the authorities. It follows from this information that, on the one hand, prior integrity checks on the appointment of ministerial advisers or advisers to the President of the Republic coming from the private sector, as set out in decree, are systematic and effective. On the other hand, advisers from the public sector are already subject to the ethical principles applicable to all public officials, which would make prior vetting of their integrity unnecessary. Nevertheless, GRECO considers that introducing a vetting process for all prospective advisers, regardless of their previous professional background, would be a valuable addition to the current system, particularly with regard to identifying any potential conflicts of interest.
13. GRECO concludes that recommendation i remains partly implemented.
Recommendation ii
14. *GRECO recommended that the multi-annual plan for the fight against corruption be extended to cover the Private Office of the President of the Republic.*
15. GRECO recalls that this recommendation was deemed to be partly implemented in the Second Compliance Report. GRECO noted that the preparation of the next national anti-corruption plan (2024-2027) was under way and a public consultation had taken place. It welcomed the discussions that were being held on the possibility of including the Private Office of the President of the Republic in the plan. However, it stressed that the discussions were still in progress and the next multi-annual anti-corruption plan had not yet been adopted.
16. The French authorities state that the multi-annual national anti-corruption plan (PNPLC), adopted at an interministerial meeting on 16 June 2025, was published on 14

November 2025.² The plan includes a measure entitled “raising awareness of the risks of integrity breaches by members of the government and their private offices, particularly through drafting and disseminating a code of conduct and systematically organising dedicated training courses.” Due to the French institutional structure, the Private Office of the President of the Republic is not included in this measure. The authorities emphasise that the multi-annual anti-corruption plan is, by its nature, a governmental plan. It is therefore intended to apply to all ministries and their respective administrations, and the Presidency of the Republic is excluded from its scope.

17. GRECO regrets that the Private Office of the President of the Republic was not included in the multi-annual national anti-corruption plan adopted on 16 June 2025, contrary to the recommendation. However, GRECO notes that other initiatives identified previously (strengthening internal control within the offices of the Presidency, diagnostic assessment in order to identify measures and good practices in preventing breaches of integrity) remain relevant, but reiterates the need for a more comprehensive approach in order to fully implement the recommendation.
18. GRECO concludes that recommendation ii remains partly implemented.

Recommendation iv

19. *GRECO recommended (i) the adoption of codes of conduct for each ministry containing rules common to all PTEFs in government that cover all integrity matters (preventing and managing conflicts of interest, declaration requirements, incompatibilities, gifts, post-employment restrictions, contacts with lobbies, and confidential information, etc.), including practical examples, and being made public; (ii) the finalisation of the revision of the Ethics Charter of the Presidency, making sure that it covers the relevant above-mentioned integrity matters and includes practical examples to illustrate each standard; (iii) the introduction of checks on compliance with the codes, together with proportionate disciplinary measures.*
20. It is recalled that this recommendation was considered partly implemented in the Second Compliance Report. GRECO noted that codes of conduct were being drawn up within various ministries and deemed that the first part of the recommendation therefore remained only partly implemented. With regard to part (ii) of the recommendation, GRECO welcomed the finalisation of the revision of the Ethics Charter of the Presidency, but indicated that as it had not been able to consult the Charter as revised, it was not in a position to determine whether its content met the conditions of the recommendation. Therefore, this part of the recommendation had still not been implemented. With regard to part (iii) of the recommendation, GRECO found that the authorities had demonstrated that checks on compliance with the existing codes of conduct had been accompanied by proportionate disciplinary measures, as required by the recommendation. Therefore, pending the adoption of codes of conduct within each ministry, this part of the recommendation was deemed to have been partly implemented.

² <https://www.agence-francaise-anticorruption.gouv.fr/fr/publication-plan-national-pluriannuel-lutte-contre-corruption-2025-2029>.

21. With regard to part (i) of the recommendation, the French authorities point out that, pursuant to Article 3 of Law No. 2016-1691 of 9 December 2016 on transparency, anti-corruption measures and the modernisation of economic life ("Sapin II" law), authorities are required to set up, under the supervision of the French Anti-Corruption Agency (hereinafter AFA), a corruption prevention and detection system. To achieve this, the AFA recommends that they adopt a code of conduct that defines and illustrates, through examples from the authorities' work, the different types of behaviour to be avoided as likely to constitute breaches of probity.³ The 2025-2029 anti-corruption plan includes a measure reiterating the importance of state authorities' commitment, particularly those most exposed to risks, to setting up a comprehensive system for preventing, detecting and remedying the risks of breaches of probity, based on a detailed analysis of the risks they face. This system, which is to include risk mapping, is intended to apply to central government services and the various levels of decentralised government. It may be subject to checks by the AFA. The 2025-2029 plan also provides for raising awareness of the risks of breaches of probity among members of government and their private offices, in particular through the development and dissemination of a code of conduct. The implementation of this measure is entrusted in a coordinated manner to the ministerial cabinets, the AFA, the HATVP and the General Secretariat of the government. The indicators for completion of this measure include the adoption of a Code of Conduct and the implementation of dedicated awareness-raising activities.
22. The authorities report that the Directorate General of Administration and Public Service (DG AFP) has compiled a list of ethics tools that exist within each ministry or have been made available to them. The results of this survey show that all the ministries have made ethics tools available to staff. These include ethics charters or codes of conduct, which are either public or accessible only to the relevant officials, and which have been drawn up for all staff or for certain sensitive functions, such as inspectorates general (in all ministries), sovereign functions (prison service, security forces), procurement (in several ministries, as well as in the Directorate of Public Procurement (DAE) – and a guide to public procurement, which was drawn up jointly by the AFA and the DAE, was published in 2020) and various panels, etc.; measures to raise awareness of ethical obligations among candidates for contractual positions and new recruits, irrespective of their contractual status; guides or specific documents concerning certain situations such as gifts and invitations (including the AFA's gifts and invitations guide), secondary activities, conflicts of interest and social network use; training courses attended online (Mentor interministerial platform, MOOC, etc.) or in person. In addition, many ministries' ethics advisers publish their opinions and annual reports on the internet or on their ministry's intranet.
23. With regard to part (ii) of the recommendation, the authorities state that the Presidency has decided to establish an ethics board by decree, which should happen soon. It will comprise three members, including a member of the Conseil d'État who will chair it, and two individuals with relevant experience in ethics, who will be appointed for a three-

³ See recommendations 416 et seq. of "Les recommandations de l'AFA", available online at: <https://www.agence-francaise-anticorruption.gouv.fr/files/files/Recommendations%20AFA.pdf>; courtesy translation available here: <https://www.agence-francaise-anticorruption.gouv.fr/files/files/French%20AC%20Agency%20Guidelines%20.pdf>.

year term with no scope for dismissal during that period. It will have the power to handle cases involving any member of the Presidency staff and will carry out its duties entirely independently. Once established, the board will finalise the draft code of conduct, for which the HATVP has already been consulted. The new charter takes into account the latest version of the AFA's Practical Guide to the risks of integrity breaches relating to gifts and invitations, which was published at the end of 2022. Aimed at all members of the President's private office and staff, it will be published on the intranet site and on the public website of the Presidency, in the interests of transparency.⁴ New recruits will also be systematically briefed on these issues during the mandatory HR induction seminar.

24. Regarding part (iii) of the recommendation, the authorities consider that this part should be deemed to be implemented satisfactorily, given that it has been demonstrated that codes of conduct have been adopted for each ministry.
25. GRECO welcomes the work carried out by the authorities to identify existing ethics tools within each ministry. This survey demonstrates that the principles of integrity are well established in French public service. At the same time, it shows that relevant ministers and/or secretaries of State are generally not bound by charters of ethics or codes of conduct, which often concern specific institutions or certain sensitive functions. GRECO reiterates that the aim of the recommendation is to establish integrity rules that apply to all persons with top executive functions (PTEFs), regardless of their position in government (ministers, state secretaries, advisers and senior civil servants working at the highest level of the executive), so as to provide guidance on the application of the law to practical situations of the exercise of executive power, as experienced by PTEFs (Evaluation Report, paragraph 62). Part (i) of the recommendation therefore remains partly implemented, as does part (iii), which builds on it. Regarding part (ii) of the recommendation, GRECO notes the information provided about the imminent finalisation and publication of the Code of Ethics of the Presidency. At this stage, however, GRECO is not in a position to consider this part of the recommendation as implemented.
26. GRECO concludes that recommendation iv remains partly implemented.

Recommendation v

27. *GRECO recommended that (i) awareness-raising on integrity issues be provided systematically for persons with top executive functions when they take office and when legislative developments so require; (ii) confidentiality of interviews with ethics advisers be provided for by law; (iii) ethics advisers be required to take specific training on addressing ethical issues referred to them.*
28. GRECO recalls that this recommendation was partly implemented in previous reports. Parts (ii) and (iii) of the recommendation were deemed to be implemented; and the first

⁴ The French authorities informed GRECO in the course of its 101st plenary meeting that the Code of Ethics for the Presidency of the Republic had been signed by the Secretary General and distributed to all of the President's staff and collaborators. It will also be available on the Presidency's website in November 2025. This development, and its effective implementation, will be examined in the next reporting exercise.

part of the recommendation was deemed to be partly implemented. GRECO welcomed the introduction of a questionnaire designed to help Government members identify potential conflicts of interest at the time of their appointment. However, it considered that these measures covered only part of the recommendation (raising awareness of conflicts of interest when taking office).

29. The French authorities point out that in order to avoid any risk of conflict of interest, and in accordance with Article 20, part I, paragraph 3 of the Law of 11 October 2013 on transparency in public life, the HATVP provides individualised and confidential ethics advice to public officials. It may be asked for an opinion on ethics guidance (charter, code of conduct) or on the personal situation of the public official who made the referral or one of their subordinates. Such opinions may be made public with the consent of the person making the referral. In 2024, the HATVP issued 12 opinions, compared with 27 in 2023, three of which concerned draft ethics charters. This decline is due in particular to the formal establishment of an ethics adviser for local elected representatives. The HATVP also runs awareness-raising campaigns and in-service training courses.⁵ It maintains an ongoing dialogue with the authorities and their advisers, which resulted in 57 external consultations in 2024 – a marked increase compared to the 35 consultations held in 2023 – as well as several webinars and meetings. Due to the high turnover in ministers' private offices following the resignation and formation of three governments in 2024, there was a notable increase in the frequency of contact with the private offices, which are the primary liaison points for the referral process.
30. The authorities add that, alongside the HATVP, the DG AFP is instrumental in raising awareness of integrity issues among officials working in the public service or performing public service duties. Under Decree No. 2016-1804 of 22 December 2016, the DG AFP is responsible for co-ordinating measures to ensure ethical conduct and prevent conflicts of interest in the public service. In this context, and given their central role in fostering an ethical culture within government departments, the DG AFP co-ordinates the network of ministerial ethics advisers (i.e. chairs of ethics boards and individual advisers), in particular through biannual meetings, working groups, bilateral meetings and ad hoc consultations. At the network's last two meetings, held on 5 December 2024 and 12 June 2025, academics and HATVP officials discussed public-private mobility and secondary activities, and shared best practices for preventing conflicts of interest, including presentations on the tools used by the Ministry of the Armed Forces and the register of withdrawals and reservations at the Ministry of the Economy and Finance. A working group on secondary activities also met on 29 April 2025. During the course of 2025, the ministerial ethics advisers were also involved in drawing up a list of ethics charters and other relevant tools used by the ministries. They will also be consulted on a booklet on ethics for HR managers, which is being produced by the DG AFP and will be published on the civil service portal. The booklet will be illustrated with situations drawn from case

⁵ On 11 February 2025, the High Authority provided training to officials working for the Prime Minister's services. On 12 June 2025, it also addressed the network of ministerial ethics advisers led by the DG AFP to present its doctrine on mobility control, illustrated by opinions relating to former members of ministerial private offices and former directors of administration. In July 2024, it also organised an information meeting for ministerial private offices to remind them of the framework applicable to the control of ministerial advisers' mobility. Finally, the High Authority is regularly called upon to participate in the initial training of the National Institute of Public Service (INSP), which trains senior civil servants.

law and the opinions of the Public Service Ethics Commission (CDFP) and the HATVP. The HATVP will also be consulted on the draft booklet.

31. In addition, the authorities report that a collaborative digital space has been created for ministerial ethics advisers. It is designed to support them in the performance of their duties, in particular by informing them of significant news and providing them with resources: texts, case law, annual reports, opinions issued by the HATVP and ministerial ethics advisers, HATVP and AFA guides, minutes of network meetings, as well as, in the near future, thematic sheets drawn up by the DGAFP, based in particular on opinions issued by the CDFP and the HATVP, and an FAQ section to answer any questions they may have.⁶ The HATVP will be consulted on work relating to the above-mentioned thematic sheets. Lastly, in January 2025, the HATVP published an updated version of the disclosure requirements guide,⁷ which clarifies the meaning of the requested information and addresses the most common issues encountered. This guide is the main resource for public officials with questions about disclosure requirements. It now includes two new sections, one on financial instruments and arrangements for managing them, and another on identifying and preventing risks of conflicts of interest. According to the authorities, there are a variety of tools available to public officials, who can take part in the many awareness-raising activities run by the HATVP and the DGAFP. It follows from the above that persons with top executive functions are regularly made aware of issues relating to their integrity, including when legislative developments so require.
32. GRECO notes that a set of resources exists to raise awareness of integrity issues among persons with top executive functions throughout their term of office. In particular, specific guides have been published, and monitoring of legal developments has been put in place, in addition to the more general training on offer. GRECO welcomes the key role played by the HATVP and ministerial ethics advisers in this respect. GRECO considers these measures to demonstrate a renewed focus on compliance with ethics rules among PTEFs, thereby meeting the objective of the first part of the recommendation. The other two parts have already been deemed implemented.
33. Therefore, GRECO concludes that recommendation v has been dealt with in a satisfactory manner.

Recommendation vi

34. *GRECO recommended that (i) persons with top executive functions be required to disclose on a regular basis details of the lobbyists they meet and the topics discussed; (ii) all lobbyists who enter into contact with public officials (in particular, persons with top executive functions), regardless of whether they themselves initiated the contacts, be required to register on the register of lobbyists.*

⁶ See also the general information sheets available on the civil service portal, which outline [the ethical obligations of civil servants](#), [the rules and procedures governing multiple employment and public-private mobility](#), and provide answers to questions about [multiple employment](#) and civil servants [leaving the public sector to join the private sector](#). A training module entitled "Adopting the right ethical reflexes" (lasting 4 hours) is also available online ([Adopter les bons réflexes en matière de déontologie](#)).

⁷ Guide to declarations, available on the HATVP website: https://www.hatvp.fr/wordpress/wp-content/uploads/2025/01/HATVP_guide-des-declarations-2025.pdf

35. GRECO recalls that this recommendation was considered not implemented in the Second Compliance Report. It welcomed the conclusions of the rapid response report drawn up by members of the National Assembly, which recommended removing the initiative requirement so that lobbyists must also declare communications entered into at the request of a public official. However, GRECO found that no concrete measures had been taken to implement this recommendation, and the disclosure requirement continued to apply to lobbyists only.
36. With regard to part (i) of the recommendation, the French authorities report that there have been no new developments since the last Compliance Report.
37. Regarding part (ii) of the recommendation, the authorities point out that since the introduction of the Sapin II law on 9 December 2016, the HATVP has been responsible for managing an online register accessible via its website. Lobbyists must sign up to this register and report on the scope of their lobbying and the activities involved each year. The register aims to provide public information on the relations between lobbyists and public officials with regard to public decision-making. Lobbyists are also required to submit an annual activity report to the HATVP. The authorities specify that the legislature's intention in 2016 was, on the one hand, to improve its understanding of, and ability to measure, the impact of lobbying on the normative process, and on the other, to identify lobbying activities carried out at the initiative of lobbyists. They refer to the rapid response report of 3 May 2023 (see Second Compliance Report, paragraph 39) and the recommendations made in this context.
38. The authorities also point out that, for several years, the HATVP has called for the scope of lobbying to be clarified and simplified, particularly by removing the criterion of contact at the initiative of the lobbyist and by making the rules on reporting thresholds more straightforward. It has also suggested amending the reporting procedures, including by increasing the reporting frequency (from once to twice a year) and requiring more accurate information to be provided. It was in this spirit that the creation of a new register for foreign influence was conceived. Law No. 2024-850 of 25 July 2024,⁸ aimed at preventing foreign interference in France, provides for the establishment of a new register introducing more extensive reporting requirements than the current requirements for lobbyists and covering communication with an expanded list of public officials, whether initiated by the natural or legal person or the public officials themselves.⁹ Article 18-11 of the Law of 11 October 2013 on transparency in public life establishes registration and reporting requirements for "natural or legal persons who, at the order, at the request or under the direction or control of a foreign principal, [...] and for the purpose of promoting the latter's interests, carry out one or more activities intended to influence public decision-making, particularly with regard to the content of

⁸ The decree implementing the first articles of this law was published in the Official Journal on 1 August 2025. The decree specifies the terms and conditions for implementing the new measures relating to transparency of foreign influence activities. In particular, it provides for the creation of a dedicated digital directory on 1 October 2025. This directory has therefore been in effect since the 1st of October 2025.

⁹ HATVP, "Le dispositif français d'encadrement de l'influence étrangère" [French system for controlling foreign influence activities], 16 July 2024:

<https://www.hatvp.fr/lobbying/actualites/le-dispositif-francais-dencadrement-de-linfluence-etrangere/>.

laws, regulatory acts or individual decisions, or the conduct of national, European or foreign policies".

39. GRECO considers that, in the absence of any new developments, part (i) of the recommendation remains not implemented. As regards part (ii), it notes that the law on preventing foreign interference in France entered into force on 1 July 2025. This law introduces more extensive reporting requirements for lobbyists acting on behalf of a foreign principal and establishes a dedicated digital register of foreign influence activities to be managed by the HATVP. However, GRECO notes that the law does not concern the existing register of lobbyists, which is the subject of this recommendation. As a result, part (ii) of the recommendation also remains not implemented.

40. GRECO concludes that recommendation vi remains not implemented.

Recommendation vii

41. *GRECO recommended that the register of withdrawals cover not only ministers but also members of private offices.*

42. GRECO recalls that this recommendation was deemed to be partly implemented in the Second Compliance Report. GRECO noted that, unlike the register of withdrawals for members of the Government, withdrawals of members of ministers' private offices and of the offices of the Presidency were not made public. GRECO pointed out that the aim of this recommendation was to include such withdrawals in the public register for ministers or at least to publish separate registers for withdrawals of members of private offices. GRECO also noted that the Commission on Access to Administrative Documents (CADA), in an opinion delivered on 12 May 2022, had considered that the registers of withdrawals of members of ministers' private offices were administrative documents that could be disclosed to any person who requests them. It therefore found that nothing seemed to stand in the way of these registers being published online.

43. The French authorities point out that the requirement to withdraw from decision-making covers not only ministers but also members of their private offices. In 2024, the HATVP requested that 16 members of various governments in office take action to mitigate conflicts of interest. In such cases, the Prime Minister specifies by decree the areas or entities in respect of which a government member refrains from exercising all or part of their powers. These decrees are listed in a "[Conflict of interest prevention register](#)", which is freely accessible online. Also in 2024, the HATVP requested that 51 Government advisers and members of staff working for the President of the Republic take mitigation measures after reviewing their declarations of interests. The registers of withdrawals of ministers' private office members are administrative documents that can be disclosed to anyone who requests them.

44. GRECO notes that, while the registers of withdrawals of ministers' private office members are administrative documents that can be disclosed to anyone who requests them, they are not automatically made public. It calls on the authorities to remedy this shortcoming with a view to fully implementing the recommendation.

45. GRECO concludes that recommendation vii remains partly implemented.

Recommendation viii

46. *GRECO recommended that declarations of assets and interests of the presidential candidate who has been elected be examined by the High Authority for Transparency in Public Life upon his/her taking office in order to prevent any conflict of interest, real or perceived.*
47. GRECO recalls that this recommendation was not implemented in the Second Compliance Report. It noted that there had been no new developments since the last report. While the requirement for presidential candidates to submit a declaration of assets and a declaration of interests and activities and their publication were positive elements, the declarations of the elected candidate were not subject to any control, in particular at the time of taking office, as required by the recommendation.
48. The French authorities report that there have been no new developments since the last Compliance Report.
49. In the absence of new information, GRECO concludes that recommendation viii remains not implemented.

Recommendation ix

50. *GRECO recommended (i) examining how to increase transparency concerning the interests declared by close advisers of ministers and the President of the Republic; (ii) considering extending the requirement for persons with top executive functions to make declarations of assets and interests to their spouses, partners and dependants (it being understood that such information would not necessarily need to be made public).*
51. GRECO recalls that this recommendation was not implemented in previous reports. In the absence of any new information, it considered that part (i) of the recommendation had still not been implemented. As regards part (ii) of the recommendation, GRECO reiterated its established position that careful consideration of any matter required that the reflection process were sufficiently in-depth, involved the pertinent stakeholders and were fully documented. With this in mind, GRECO encouraged the authorities to pursue their efforts towards the implementation of this recommendation.
52. The French authorities report that there have been no new developments since the last Compliance Report with regard to either aspect of this recommendation.
53. In the absence of any tangible progress, GRECO concludes that recommendation ix remains not implemented.

Recommendation x

54. *GRECO recommended that the High Authority for Transparency in Public Life be able to make public as a last resort any failure of the Prime Minister to end a conflict of interest.*

55. GRECO recalls that this recommendation was not implemented in the previous reports. It took note of the information provided by the French authorities, which more or less described the information already outlined in the Evaluation Report and was an indication that no progress had been made in the implementation of this recommendation.
56. The French authorities point out that the Prime Minister, like all members of the Government, is subject to Article 1 of [Law No. 2013-907 of 11 October 2013](#) on transparency of public life, which provides that “members of government, those holding an elective mandate at local level and those performing a public service” shall make sure that any conflict of interest is prevented or ended immediately. As one of the most senior figures in the French state, the Prime Minister is subject to particularly high standards of probity, which justify the checks carried out by the HATVP before, during and after their term of office.
57. Like other members of the government, the Prime Minister is obliged to end any conflicts of interest. Although the HATVP cannot order the Prime Minister to end a conflict of interest (Article 10 of the Law of 11 October 2013), it does inform the President of the Republic of any failure by the Prime Minister to honour their obligation to end such conflicts (Article 22 of the Law of 11 October 2013). If the Prime Minister believes that a conflict of interest exists with regard to the exercise of some of their powers, they must delegate those powers to the minister who is named first in the decree concerning the composition of the Government (Article 1 of Decree No. 59-178 of 22 January 1959 on ministers’ powers). The authorities consider that the HATVP’s reporting procedures, such as notifying the Prime Minister or the Public Prosecutor’s Office, meet the goal of remedying potential conflicts of interest and should be favoured over the HATVP publicly disclosing a Prime Minister’s failure to end a conflict of interest.
58. GRECO takes note of the HATVP’s reporting procedures for remedying any conflicts of interest, including situations involving the Prime Minister. However, unlike the situation regarding ministers, the HATVP cannot order the Prime Minister to end a conflict of interest or disclose any such failures on the Prime Minister’s part. Therefore, GRECO cannot regard this as sufficient to regard the recommendation as partly implemented.
59. GRECO concludes that recommendation x remains not implemented.

Recommendation xi

60. *GRECO recommended that, with regard to acts of corruption relating to the performance of their duties, government members be brought before a court that ensures total independence and impartiality, both real and perceived.*
61. GRECO recalls that this recommendation was not implemented in the Second Compliance Report. It took note of the information provided according to which the composition of the Court of Justice of the Republic (CJR) remained unchanged. It reiterated that such composition may create suspicion about the CJR’s independence and impartiality, as politicians would, at least in part, be tried by their peers.

Furthermore, GRECO noted that recent cases had reopened the debate on the CJR's independence and impartiality, in particular its perceived impartiality.

62. The French authorities state that the CJR has not been reformed in terms of its composition, organisation or functioning since the adoption of the last Compliance Report. Such a reform would require a revision of the Constitution of 4 October 1958, which would need to be approved by either a referendum or a three-fifths majority of both houses of parliament convening in congress. The authorities emphasise that, given the current political instability, such reform cannot be envisaged at this time.
63. However, the French authorities insist that the procedure set out in the 1958 Constitution and Organic Law No. 93-1252 of 23 November 1993 provides for a number of guarantees regarding the CJR's independence and impartiality. According to Article 68-2 of the Constitution, any person claiming to be a victim of a serious crime or other offence committed by government members in discharging their duties may lodge a complaint with the petitions committee, which is made up of a majority of independent judges, including three judges and two senior advisers from the Court of Auditors. The chief public prosecutor at the Court of Cassation is responsible for referring cases to the investigating committee and acts with total independence. Consisting of three independent judges from the Court of Cassation, the investigating committee has investigative powers and, acting on the advice of the chief public prosecutor at the Court of Cassation, decides whether to refer the case to the CJR or dismiss it. Furthermore, hearings before the CJR are open to the public, enabling all citizens and the press to follow the case, the arguments and the public prosecutor's recommendations. The rules governing proceedings and judgments are the same as those laid down in the Code of Criminal Procedure for all criminal courts, except for voting, which is by secret ballot. The CJR's decision can be appealed against to the Court of Cassation. If the Court overturns the decision, it will send the case back to the CJR for reconsideration by a different panel. Lastly, since its establishment, and following the investigation process conducted by an independent committee, the CJR has heard and ruled on cases against 10 ministers and two state secretaries, resulting in seven convictions.
64. According to the authorities, it therefore appears that, on the one hand, there has been an increase in the CJR's activity over the last few years, and, on the other, that the court provides several guarantees of its independence and impartiality, such as the right of any alleged victim to refer the matter to a petitions committee comprising mainly judges, the composition of the investigating committee and the public nature of the proceedings.
65. GRECO takes note of the information provided by the French authorities regarding the guarantees of independence and impartiality of the Court of Justice of the Republic. However, the situation has remained broadly unchanged since the Evaluation Report. In particular, the question of the CJR's impartiality, both actual and perceived, remains unresolved.
66. As a result, GRECO concludes that recommendation xi remains not implemented.

Recommendation xii

67. *GRECO recommended that the National Financial Prosecution Office be provided with additional resources, specifically in terms of staff, and that its independence from the Executive be ensured, in particular through additional guarantees on the reporting to the Executive of information concerning ongoing proceedings against persons with top executive functions in order to preserve the integrity of investigations.*
68. GRECO recalls that this recommendation was partly implemented in the Second Compliance Report. GRECO noted with satisfaction that additional resources had been allocated to the National Financial Prosecution Office (PNF), which now had 20 judges/prosecutors, eight specialised assistants and two assistant legal experts, i.e. a slight increase in staff since the adoption of the Evaluation Report (which noted 18 judges/prosecutors and six specialised assistants). It encouraged the authorities to continue their efforts and considered that this part of the recommendation had now been partly implemented. Regarding reporting of information from the PNF to the Executive concerning ongoing proceedings, GRECO pointed out that it had already examined the current arrangements in its previous report and concluded that sufficient consideration had not been given to the issue of reporting in cases concerning PTEFs in particular. Therefore, this part of the recommendation had still not been implemented.
69. The French authorities report that the number of staff at the PNF increased in 2024 and now stands at 20 judges/prosecutors, nine specialised assistants, two judicial officers, one judicial assistant and 18 registry staff. As of 1 September 2025, staff numbers remain unchanged. The PNF's judges and prosecutors are generally experienced professionals who are selected through calls for applications requiring specific skills, known as "profile calls", in which technical suitability takes precedence over the usual recruitment guidelines, including seniority. In addition, for the first time since its establishment, the number of pending cases has fallen compared to the previous year, indicating that the PNF has sufficient resources to handle cases within its jurisdiction. On average, each judge or prosecutor handles 40 cases. This figure is reduced to 35 if cases handled by an investigating judge and monitored by a PNF prosecutor are excluded.
70. With regard to the reporting of information, the authorities point out that, pursuant to Article 30 of the Code of Criminal Procedure, the Minister of Justice cannot under any circumstances issue instructions to the PNF in individual cases, and that such upward reporting is not systematic and is carried out via the Paris Public Prosecutor's Office. In addition, the Law of 25 July 2013, set out in the Circular of 31 January 2014 and reiterated in the Dispatch of 3 March 2021, establishes a framework for this type of reporting, providing precise rules: the reports must relate only to acts that have been carried out, never to acts to be carried out in the future; no case documents may be transmitted; and the purpose of such reports is to inform the Ministry of Justice about trends in the serious crimes or other offences involved, not about specific incidents.
71. The authorities emphasise that this reporting enables the Ministry of Justice to assess whether France's anti-corruption measures comply with its international obligations. Thanks to this reporting mechanism, the Ministry of Justice has identified necessary

improvements to the anti-corruption enforcement regime for private individuals. For example, the Warsmann Law of 24 June 2024 introduced, through an amendment, a penalty of general asset confiscation for corruption and influence-peddling offences, and the Law of 13 June 2025 on getting France out of the drug trafficking trap strengthens procedural arrangements for corruption cases involving aggravating circumstances. On 14 September 2021, the Constitutional Council examined the reporting mechanism and confirmed that upward reporting, as defined in law (Articles 30, 35, 39-1 of the Code of Criminal Procedure), ensured a reasonable balance between the principle of an independent judicial authority and the prerogatives with regard to criminal justice policy conferred on the government by Article 20 of the Constitution (Decision No. 2021-927 QPC).

72. The authorities add that, under Article 2-1 of Decree No. 59-178 of 22 January 1959 on ministers' powers, a withdrawal mechanism, with powers transferred to the Prime Minister's Office, prevents and safeguards against any risk of conflict of interest regarding matters in respect of which the relevant minister considers it inappropriate to exercise their powers. This mechanism was used during the term of former French Minister of Justice, Éric Dupont-Moretti, with the publication of decrees in France's Official Gazette on 3 June 2022 and 12 January 2024. Lastly, the effective nature of the PNF's independence and impartiality is demonstrated by the standing of those who have been accused and referred to the criminal court by or at the request of the PNF, including a former president of the Republic (who was convicted of bribing a judge and influence peddling by a final judgment of the Paris Court of Appeal on 17 May 2023 and convicted by the Paris Criminal Court in the so-called Libyan financing case), former ministers, a political party leader, a former intelligence chief and business leaders from some of the most important companies in the French economy.
73. GRECO notes that the number of staff at the National Financial Prosecution Office has been increased. It encourages the authorities to continue to address this important issue and to allocate the necessary additional resources to the PNF, in order to consolidate its work and enhance its effectiveness. In addition, the authorities have demonstrated that safeguards are in place regarding the transmission of information about ongoing proceedings to the government, especially when they concern persons with top executive functions.
74. Consequently, GRECO concludes that recommendation xii has been implemented satisfactorily.

Preventing corruption and promoting integrity in law enforcement agencies

Recommendation xiii

75. *GRECO recommended the adoption of a global strategy focusing on the prevention of corruption risks within law enforcement agencies on the basis of risk assessments and the most vulnerable sectors as drawn up by the National Gendarmerie and the National Police.*

76. GRECO recalls that this recommendation was partly implemented in the Second Compliance Report. It noted the developments that were under way and moving in the right direction in the National Police (including the explicit inclusion of lack of integrity in the risk catalogue and steps taken with regard to departments which are particularly vulnerable to corruption, such as the Central Department for Racing and Betting, etc.). GRECO was also pleased to note the implementation of the professional conduct action plan by the National Gendarmerie in 2022, but found that in the absence of a global strategy covering all law enforcement agencies on the basis of existing risk assessments, the recommendation could not be considered as fully implemented.

77. With regard to the existence of a global strategy, the French authorities report that the National Police Inspectorate General (IGPN) and the National Gendarmerie Inspectorate General (IGGN) regularly work together to harmonise their respective standards and practices. The Police and Gendarmerie are also bound by the same code of ethics. With regard to breaches of probity relating to access to sovereign files, a working group, co-chaired by the Central Office for Combating Corruption and Financial and Tax Offences (OCLCIFF) and the AFA, is working across the board on this issue. The working group has brought together on a regular basis the directorates general of the key ministries likely to be exposed to organised crime, including, among others, the IGGN, the IGPN, the Directorate General of the National Police (DGPN) and the Directorate General of the National Gendarmerie (DGGN). Guidelines (which are not public) for implementing systems that control the risk of probity breaches related to access to files have been adopted in December 2024 by the AFA, jointly with the Ministry of Justice, the Ministry of Finance and the Ministry of the Interior. These guidelines, developed on the basis of an analysis of risk areas and a compilation of current best practices, contain general principles aimed at alerting all sovereign services to the various points to be monitored in relation to file management.

78. Since 2025, a working group has also been bringing together the same institutions to address the issue of detecting 'weak signals' of corruption linked to organised crime, such as unusual or suspicious individual behaviour, suspicious professional practices or anomalies in procedures, which may be indicators of future compromises. This group is also working on training programmes to raise awareness of the risk of corruption among those involved in the sovereign sphere. According to the authorities, this shows that there is a co-ordinated strategy to prevent corruption in law enforcement agencies, involving relevant stakeholders from both the National Police and the National Gendarmerie. This comprehensive approach is also reflected in the multi-annual national anti-corruption plan 2025-2029, adopted on 16 June 2025, Article 7 of which includes the goal of "identifying emerging risks and modes of action related to the use of corruption by organised crime, and sharing good risk management practices within authorities dealing with the issue (e.g. customs, police, the justice system and the prison service, etc.)". The departments of the Ministry of the Interior are working on implementing the national plan. In addition, an inter-inspection audit mission involving the IGA, IGGN and IGPN is currently underway to audit the risks of breaches of probity within the Ministry of the Interior. The aim is to establish a precise diagnosis of breaches of probity within the internal security forces; to describe and evaluate detection mechanisms within the national police and gendarmerie; to identify the internal and external causes of breaches of probity; to assess the operational consequences for the

Ministry of the Interior; and to identify levers for reducing these breaches of probity. The recommendations made should lead to the establishment of a ministerial action plan specifying the provisional timetable for implementation and the departments responsible for the actions to be taken. Within the National Police, the IGPN was designated by the Director General of the National Police as the lead agency for professional ethics in July 2025. In this capacity, it is in the process of defining a doctrine and methodology to harmonise the ethical practices of the regional directorates of the National Police. A working group has been tasked with developing a model for a coordination mechanism and guidelines.

79. With regard to risk assessments, the authorities state that, as part of a global effort that goes beyond the work of law enforcement agencies alone, the AFA has identified risk categories and a number of sectors that are particularly exposed to the risk of corruption in France, including sectors, stakeholders and public authorities particularly vulnerable to corruption involving organised criminal groups and drug trafficking: ports, airports, the prison service, public procurement, transport companies, dockers and the consultation of files held by key government departments. In 2024, the AFA therefore carried out an audit of the measures and procedures implemented in ports to prevent and detect corruption risks and proposed a number of remedial measures (including legislative and organisational changes to strengthen port security). At the request of the Minister of Justice, in 2025 the AFA will carry out an audit of the measures and procedures implemented in the prison service to prevent and detect corruption risks.
80. In December 2024, the OCLCIFF produced an overview of corruption detected by law enforcement agencies, intended for public decision-makers and senior investigators. This report, which is based on an analysis of the French investigative services' current case portfolio for breaches of probity, highlights and illustrates several important trends, such as the existence of regional corruption hotspots where the problem is most acute; the threat posed by organised crime groups to both the public and private sectors due to their financial power and the corruption that this enables; the under-detection of corruption in the private sector; the need for greater vigilance in accounting and legal professions; and the need to anticipate risks of foreign interference arising from breaches of probity. The authorities also emphasise the important role of the Court of Auditors, an independent external audit body, in risk analysis and in ensuring the proper use of public funds. The Court of Auditors organises its work based on an analysis of risks and challenges, particularly with regard to lawfulness, that it identifies during inspections or that are reported to it via a secure platform for whistleblowing. In 2024, an assessment of public anti-corruption policy was launched, which should be published in 2025. Other assessments have already been carried out, such as the 2023 assessment of the anti-money laundering framework. Since 2024, the AFA has also created an internal department, the Observatory of Breaches of Probity, whose main tasks are to develop methods, tools and analyses to provide the most objective picture possible of the major trends in corruption. This work is based on an analysis of court decisions issued by the Ministry of Justice, as well as data from the statistical departments of the Ministries of the Interior and Justice. An initial analysis note was published in December 2024 and further work is ongoing.

81. In addition, the authorities refer to the concerted efforts under way to compile risk assessments for the police and gendarmerie corps. As part of the National Gendarmerie's professional conduct action plan for 2022-2024, the IGGN mapped the ethical risks facing the National Gendarmerie and identified 14 major risks, including that of "compromises and breaches of integrity". This risk was reviewed for the first time in October 2024, resulting in its reclassification from "unlikely" to "possible". Three sub-risks were also outlined: breaches of the duty of probity in the strict sense; similar breaches; and other breaches of probity relating to ethical conduct. These were categorised as "possible", "probable" and "almost certain", respectively, with the impact always categorised as "certain". The risk map is likely to be updated following work being carried out by the IGGN's internal investigation division. This ongoing assessment will be based on a distinction between the risk of corruption associated with the institution's administrative tasks (public procurement, misuse of resources, etc.) and that associated with performing administrative and judicial police duties (corruption linked to organised crime, abuse of power for personal gain, etc.).
82. The 2025-2029 multiannual anti-corruption plan provides for the setting up in all central government services, with particular attention to the most exposed sovereign services (notably customs, DGFIP, police, gendarmerie, judicial and prison services), of a comprehensive system for preventing, detecting and remedying the risks of breaches of probity, based on a detailed analysis of the risks they face. This system, which may be subject to checks by the AFA, must cover both central government services and the various levels of decentralised government. In particular, it provides for the development of risk maps in the departments of administrations that are particularly exposed, such as the prison administration and prisons, in pilot prefectures, as well as the deployment of a 'customs plan' for the prevention and detection of corruption aimed at strengthening the anti-corruption culture among staff (awareness-raising, training), updating doctrines relating to work organisations (organisation of the service, increased security of digital and IT tools), and the implementation of systematic controls of prevention and detection mechanisms. This measure was included in Article 54 IV of the Law of 13 June 2025 on getting France out of the drug trafficking trap, which reads as follows: "In order to prevent and detect the risks of corruption linked to drug trafficking, central government services and public institutions involved in the fight against drug trafficking or operating in particularly exposed areas shall establish a system for the prevention and detection of corruption, including an assessment of corruption risks and appropriate prevention and control measures, in accordance with Article 3 of Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of public life. This system shall be updated every two years."
83. GRECO notes that several corruption risk assessments are under way within the National Police and Gendarmerie. At present, however, there is still no global strategy focusing on the prevention of corruption risks within law enforcement agencies. GRECO invites the authorities to examine this matter, particularly in light of the 2025-2029 multi-annual anti-corruption plan, with a view to the full implementation of the recommendation.
84. GRECO concludes that recommendation xiii remains partly implemented.

Recommendation xiv

85. *GRECO recommended that the commentary on the code of ethics of the National Police and the National Gendarmerie be revised to further expand on integrity issues (such as conflicts of interest, gifts, contacts with third parties and handling of confidential information) with specific examples being included.*
86. GRECO recalls that this recommendation was deemed to be partly implemented in the Second Compliance Report. It welcomed the adoption of an updated version of the commentaries on two articles of the code of ethics for the National Police and the National Gendarmerie concerning integrity and conflict of interest. They provide more detail on the instances of conflicts of interest, gifts and invitations, the handling of confidential information and activities that are prohibited or require prior approval. They also give tangible examples and guidance on consulting an ethics adviser if in doubt. GRECO considered that these commentaries met the requirements of the recommendation and invited the authorities to publish and disseminate them without delay.
87. The French authorities report that the revised commentary on the code of ethics for the National Police and the National Gendarmerie has not yet been incorporated into the Internal Security Code (CSI).
88. Pending publication of the revised commentary on the code of ethics for the National Police and the National Gendarmerie, GRECO concludes that recommendation xiv remains partly implemented.

Recommendation xvi

89. *GRECO recommended that security checks relating to the integrity of members of the National Police and the National Gendarmerie be carried out at regular intervals in accordance with the Internal Security Code.*
90. GRECO recalls that this recommendation was considered not implemented in the Second Compliance Report. It took note of the conclusions of the working group set up within the National Police that the checks carried out throughout the career of a police officer amounted to an almost permanent integrity check. As for the National Gendarmerie, GRECO also noted that a number of checks were carried out during staff members' careers, and it was not considered appropriate to add further security checks. GRECO noted that, while regular vetting was carried out within the National Police and Gendarmerie, its frequency should depend on risk exposure, in order to identify possible vulnerabilities. As the level of risk had not been taken into account, GRECO considered that the aim of this recommendation had not been achieved.
91. With regard to the National Gendarmerie, the French authorities point out that the Gendarmerie's military and civilian personnel are subject to thorough screening by the National Administrative Security Investigation Service (SNEAS) upon taking up their duties. This screening can be repeated during the course of their career. In addition, some of the military personnel responsible for investigative or intelligence missions, or

for protecting sensitive sites, undergo a national defence clearance investigation by the Defence Intelligence and Security Directorate (DRSD), i.e. an especially rigorous security check when they take up the relevant duties.

92. In the event of suspicion of corruption or unethical behaviour, checks may also be carried out: by the hierarchical superior; as part of an internal administrative investigation; increasingly often as part of the implementation of intelligence-gathering techniques, under the supervision of the National Commission for the Monitoring of Intelligence Gathering Techniques (CNCTR), if the suspicions fall within the scope of the purposes defined in Article L.811-3 of the French Internal Security Code; as part of an internal judicial investigation, if necessary triggered by a report made under Article 40 of the French Code of Criminal Procedure. The authorities state that, in addition to security checks, in-depth investigations are systematically undertaken to confirm or refute suspicions.
93. The authorities have identified a particular risk of corruption linked to organised crime, or of unethical behaviour involving the misuse of files for criminal or personal gain. To facilitate the detection and subsequent verification of such acts, the Gendarmerie is developing a system called Internal Control of Application and Network Traces (CITAR) to enable hierarchical superiors to check who has consulted the criminal record files (TAJ), the wanted persons list (FPR) and the stolen objects and vehicles file (FOVES) – i.e. three of the most sensitive files containing personal data. As the Gendarmerie's ethics adviser, the head of the IGGN exercises internal control over probity through the Data Protection and Governance Audit Office (BAPGD) and through a new Co-ordination, Analysis and Support Unit (C3A) created in 2024 in the Internal Investigation Division (DEI). Lastly, the IGGN continues to carry out the most sensitive and complex administrative and judicial investigations, including those relating to corruption. In 2025, a "corruption" group was also set up in the Judicial Investigation Office (BEJ).
94. With regard to the National Police, the authorities state that statutory administrative investigations must be carried out prior to the recruitment of police officers (Article L. 114-1 of the CSI) in order to detect potential vulnerabilities. Such investigations also take place during the course of an officer's career, to ensure that their behaviour always remains compatible with their duties. With regard to the recruitment, appointment and assignment of civil servants and contract staff in the National Police, the SNEAS conducts administrative inquiries into candidates for competitive examinations for assistant police officers, cadets of the republic, police constables, police officers and police commissioners; into candidates for competitive examinations for forensic science officers; candidates for the civil reserve and citizen reserve of the National Police, and the recruitment of contract staff for the National Border Police Directorate (DNPAF) and the RAID. If deemed necessary by the administration, an administrative inquiry may also be carried out "to ensure that the conduct of the natural or legal persons concerned has not become incompatible with the duties or tasks performed" during their career, particularly when their duties change.
95. In addition, Article 22 of Law No. 2025-532 of 13 June 2025 on getting France out of the drug trafficking trap stipulates that administrative inquiries must be conducted during

the recruitment process for public sector roles that expose staff to corruption risks or organised crime threats. Lastly, since 2013, a special IGPN division has been responsible for tackling breaches of probity committed by police officers, carrying out judicial investigations under the authority of judges and prosecutors and conducting pre-disciplinary administrative investigations. In September 2025, this division, which currently comprises 11 investigators, officially became known as the "National Anti-Corruption Taskforce" to emphasise the Director General of the National Police's dedication to preventing and combating breaches of probity. Under Action No. 12 of the 2025-2029 multi-annual anti-corruption plan, the possibilities for screening or vetting public administration officials and operators who are particularly exposed to the risk of corruption may also be stepped up.

96. GRECO reiterates the importance of security checks at regular intervals throughout the careers of law enforcement personnel. It notes with satisfaction that the specific risk of corruption is receiving increased attention within the National Police and National Gendarmerie. In particular, administrative security investigations are carried out not only when staff are recruited, but also during their careers in cases of suspected corruption or unethical behaviour. The multi-annual national anti-corruption plan also proposes that vetting for staff most at risk of corruption be stepped up. GRECO hopes that this measure will be introduced quickly. In the meantime, GRECO considers that the aim of the recommendation has been partly achieved.
97. GRECO concludes that recommendation xvi has been partly implemented.

Recommendation xvii

98. *GRECO recommended that the National Police set up a rotation system in the sectors identified as most vulnerable to corruption risks.*
99. It is recalled that this recommendation was partly implemented in the Second Compliance Report. GRECO considered that the authorities had not added any new information to what was known at the time of the adoption of the Evaluation Report. It found that despite a high level of staff mobility in practice, no specific rotation system had been set up in the sectors identified as most vulnerable to corruption risks. It insisted on the fact that it considered rotation to be a way of preventing any corrupt behaviour which could arise from holding the same post over a prolonged period of time in a sensitive department and it should thus be put in place as a useful prevention tool.
100. The French authorities report that a rotation system in the sectors identified as most vulnerable to corruption risks has not been set up since the last Compliance Report. They point out, however, that the reason why the introduction of a rotation system in these sectors has not yet been finalised is because it is a complex issue for which there is no global solution. While limiting the time spent in a sensitive role may help to prevent corruption, this could result in a loss of expertise, skills and people willing to perform unpopular roles, particularly given the recruitment issues within the National Police. Against this backdrop, in May 2024, the DGPN ran a foresight project for the Police Nationale, with one of the working groups looking at the attractiveness of certain career paths and the recruitment, training and retention of police officers in 2035.

101. GRECO notes that no significant developments have taken place since the last Compliance Report as regards the implementation within the National Police of a rotation system in the sectors identified as most vulnerable to corruption risks. GRECO asks the French authorities to keep it informed of the discussions under way in this area.
102. GRECO concludes that recommendation xvii remains partly implemented.

Recommendation xviii

103. *GRECO recommended that (i) the protective regime for whistleblowers be evaluated and revised in order to simplify the reporting procedure; (ii) the training of law enforcement authorities on this regime be further strengthened.*
104. GRECO recalls that this recommendation was deemed to be partly implemented in the Second Compliance Report. It welcomed the entry into force of the various laws strengthening the whistleblower protection system, noting that whistleblowers were now able to choose the most appropriate reporting channel for their situation and that the simplification of the procedure limited the legal risks that could result in whistleblowers losing their right to protection. In this context, it also noted that the Defender of Rights was responsible for assessing the overall functioning of the whistleblower protection system in a biennial report. GRECO therefore considered that part (i) of the recommendation had been satisfactorily implemented. As regards part (ii) of the recommendation, GRECO noted with satisfaction that awareness raising on the whistleblower system had been included in the initial and in-service training of the National Police. For the National Gendarmerie, it noted that the subject of whistleblowing had been included in the "Ethics" module of the initial training of gendarme cadets, but that no specific whistleblowing module had yet been offered as part of the in-service training programme, which was being overhauled. In view of the above, GRECO considered that part (ii) of the recommendation had only been partly implemented.
105. With regard to part (ii) of the recommendation, the French authorities point out that the issue of preventing breaches of probity is dealt with during the initial training of both officers and non-commissioned officers in the Gendarmerie, with each school having a department responsible for ethics. The subject of whistleblowing systems is also addressed.
106. In addition, the authorities report that several remote in-service training modules on general and internal corruption are being designed for the Gendarmerie's military personnel. The National Gendarmerie's Multimedia Production Centre is currently developing a Massive Open Online Course (MOOC)¹⁰ on corruption awareness, under the supervision of the Criminal Investigation Sub-directorate (SDPJ) and as part of a working group involving the AFA, the National Gendarmerie, the National Police and Customs. It includes sections to raise awareness on internal corruption and whistleblowing procedures, which were prepared with the IGGN's support. The SDPJ will

¹⁰ An open access online course designed to accommodate large numbers of participants.

soon begin work on a second MOOC, in collaboration with the AFA and with the support of the IGGN, focusing on internal corruption connected to organised crime. These MOOCs will implement Action 1.5 of the Gendarmerie's professional conduct action plan ("Distribution of a guide to combating corruption and promoting integrity in the Gendarmerie"). Similarly, with OCLCIF guidance, the DGPN will develop a MOOC on whistleblowers and whistleblowing systems to support specialised corruption investigators.

107. In parallel with the ongoing work to prepare a MOOC in which whistleblowing systems will be promoted, this system is also discussed and presented during presentations by the IGGN, and in particular by the reporting and ethics division, during initial and in-service training courses, as well as at meetings of gendarmerie executives. Thus, in 2024, in addition to all military personnel trained in ethics during initial training as part of modules dedicated to ethics, approximately 1,000 officers and non-commissioned officers in mid-career benefited from ethics awareness training from the IGGN, during which the whistleblowing system was discussed. In addition, a new circular (No. 114000/GEND/CAB) on the operation of the reporting platform aims to clarify the internal system for collecting whistleblower reports.
108. GRECO takes note of the information provided. It welcomes the inclusion of the topic of whistleblowers in initial and in-service training within the National Gendarmerie as well as the development of a number of remote in-service training courses, which also cover whistleblowing systems. However, these training courses have not yet been implemented. GRECO encourages the authorities to put these training courses into practice with a view to fully implementing the recommendation.
109. GRECO concludes that recommendation xviii remains partly implemented.

III. CONCLUSIONS

110. In the light of the foregoing, GRECO concludes that France has satisfactorily implemented or dealt with in a satisfactory manner four of the eighteen recommendations set out in the Fifth Round Evaluation Report. Of the 14 remaining recommendations, nine recommendations have been partly implemented and five recommendations have not been implemented.
111. More specifically, recommendations iii, v, xii and xv have been implemented in a satisfactory manner, recommendations i, ii, iv, vii, xiii, xiv and xvi to xviii have been partly implemented and recommendations vi and viii to xi have not been implemented.
112. With regard to top executive functions, GRECO has noted some progress, particularly in raising awareness of integrity issues and in the work of the National Financial Prosecution Office. Furthermore, the multi-annual national anti-corruption plan, adopted on 16 June 2025, was published on 14 November 2025. While France has robust oversight bodies and law enforcement mechanisms, its strategic framework for tackling corruption could be strengthened. The implementation of several recommendations has also been impeded, primarily due to changes in government in 2024 and 2025. The Presidency's Code of Ethics has not yet been made public, and no reform has been

implemented for the Court of Justice of the Republic. Although prior integrity checks on advisers to the Government or the President of the Republic are systematic and effective, they currently only apply to those from the private sector. More extensive reporting requirements have been introduced, but these only apply to lobbyists acting on behalf of a foreign principal. The HATVP has recommended tangible improvements in this area, which should be implemented. Unlike the register of withdrawals for members of the Government, withdrawals by members of ministers' private offices and the offices of the Presidency are not freely accessible online. GRECO encourages the authorities to pursue their efforts in this regard.

113. As regards law enforcement agencies, GRECO notes with satisfaction that the specific risk of corruption is being given increased attention within the National Police and the National Gendarmerie, particularly when it comes to conducting an administrative security investigation. It also welcomes the ongoing development within the National Gendarmerie of a number of remote in-service training modules, which also cover whistleblowing systems; however, these initiatives have yet to be put into practice. Further efforts are also needed to implement certain outstanding recommendations concerning, in particular, the adoption of a global strategy focusing on the prevention of corruption risks within law enforcement agencies; the publication of the revised commentary on the code of ethics for the National Police and the National Gendarmerie; and the introduction of a rotation system in the sectors identified as most vulnerable to corruption risks within the National Police.
114. In the light of the foregoing, GRECO notes that France 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. It therefore decides to apply Rule 32 revised, paragraph 2 (i) and asks the Head of delegation of France to provide a report on the progress in implementing the outstanding recommendations, i.e. recommendations i, ii, iv, vi to xi, xiii, xiv and xvi to xviii, by 30 November 2026.
115. In addition, in accordance with Rule 32 revised, paragraph 2, sub-paragraph (ii.c), of the Rules of Procedure, GRECO invites the Secretary General of the Council of Europe to send a letter to the Minister of Foreign Affairs of France – with a copy to the Head of the French delegation – drawing attention to the non-compliance with the relevant recommendations and the need to take determined action with a view to achieving substantive progress as soon as possible.
116. GRECO invites the French authorities to authorise the publication of this report at their earliest convenience.