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FIFTH EVALUATION ROUND

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

SECOND ADDENDUM TO THE SECOND COMPLIANCE REPORT

SLOVENIA



Adopted by GRECO
at its 101st 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, PTEF) and law enforcement agencies (LEA)".
2. This Second Addendum to the Second Compliance Report assesses the measures taken by the authorities of Slovenia to implement the recommendations issued in the Fifth Round Evaluation Report which was adopted at GRECO's 78th Plenary Meeting (8 December 2017) and made public on 8 March 2018, following authorisation by Slovenia. The corresponding Compliance Report was adopted by GRECO at its 86th Plenary Meeting (26-29 October 2020) and made public on 5 October 2021, following authorisation by Slovenia. The Second Compliance Report was adopted by GRECO at its 92nd Plenary Meeting (28 November-2 December 2022) and made public on 22 March 2023, following authorisation by Slovenia. The Addendum to the Second Compliance Report was adopted by GRECO at its 97th Plenary Meeting (18-21 June 2024) and made public on 28 October 2024, following authorisation by Slovenia.
3. As required by GRECO's Rules of Procedure¹, the Slovenian authorities submitted a situation report on measures taken to implement the recommendations contained in the Evaluation Report. This report was received on 2 July 2025 and was subsequently supplemented, serving as the basis for this Second Addendum to the Second Compliance Report.
4. GRECO selected Spain (with respect to top executive functions in central governments) and Croatia (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Ana ANDRÉS BALLESTEROS, on behalf of Spain, and Sunčana ROKSANDIĆ on behalf of Croatia. They were assisted by GRECO's Secretariat in drawing up this Second Addendum to the Second Compliance Report.

II. ANALYSIS

5. GRECO addressed fifteen recommendations to Slovenia in its Fifth Round Evaluation Report. In the Addendum to the Second Compliance Report, GRECO concluded that six of the fifteen recommendations had been implemented satisfactorily or dealt with in a satisfactory manner, namely recommendations i, ii, iv, vii, ix and xiii, recommendations v, viii, x, xi, xii and xv had been partly implemented and recommendations iii, vi and xiv had not been implemented. Compliance with the outstanding recommendations is dealt with below.

¹ 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.

Corruption prevention and promotion of integrity in respect of central governments (top executive functions)

Recommendations iii and vi

6. *GRECO recommended that an integrity plan be established in respect of the government, as an overarching structure to the plans existing in each ministry. (recommendation iii)*
7. *GRECO recommended developing within the government an organisational strategy and practices to improve the management of conflicts of interest, including through responsive advisory, monitoring and compliance mechanisms. (recommendation vi)*
8. GRECO recalls that recommendations iii and vi were not implemented due to a lack of progress.
9. The Slovenian authorities indicate that these recommendations have been integrated into the draft Protocol on the Conduct of Members of the Government of the Republic of Slovenia for the Management of Corruption Risks (DOP), which establishes a structured approach to information, training, and awareness-raising on the expected conduct of PTEFs. Aligned with the objectives of integrity plans required under national anti-corruption legislation, the DOP includes a risk assessment framework addressing issues such as conflicts of interest, improper lobbying, and gift acceptance, and provides advisory, monitoring, and compliance mechanisms in these areas. The draft Protocol is currently undergoing interdepartmental and expert coordination to the Legislative Service of the Government of the Republic of Slovenia.
10. In support of this, a February 2025 working meeting brought together key government bodies, and a questionnaire was circulated to GRECO members to gather international input—though responses have been limited. The final report on the 2023–2026 Government Programme for Strengthening Integrity was submitted in July 2025, with many measures now incorporated into the new Action Plan for implementation of the Resolution on Prevention of Corruption, adopted by the Commission for the Prevention of Corruption (CPC). A summary of the report will also be translated into English and published on the gov.si website.
11. Pursuant to the Law on Officials, which came into force on 13 August 2025, all new public officials must complete an introductory e-training on ethics, integrity, and transparency within six months of taking office. The Minister of Public Administration, in collaboration with the CPC, is responsible for defining the training content. The agreed topics include integrity, conflict of interest, gifts, lobbying, business restrictions, incompatibilities, asset transparency, openness in public duties, integrity plans, and whistleblower protection. The Ministry and CPC are currently preparing the relevant e-training materials. The training content being developed includes interactive e-learning modules and animated case studies designed to address ethical dilemmas. It is planned that the completed training will be followed by the issuance of a certificate.
12. Further efforts include the creation of an “Integrity Corner” accessible on the desktop of each government member (or state secretary when substituting a minister). This feature provides direct access to documents related to ministers’ obligations under the

Integrity and Prevention of Corruption Act (IPCA) and the Code of Ethics for Officials in Slovenia. It also offers a range of educational content, including films produced by the CPC, the Ministry of Public Administration, the Administrative Academy, and the United Nations, which illustrate how to handle situations that may pose integrity risks. Additionally, informative web banners will serve as automatic reminders to ministers of their duties in promoting integrity and preventing corruption. These initiatives are currently in the preparatory phase, with full technical implementation planned for autumn 2025.

13. GRECO welcomes the ongoing measures to establish an integrity plan for PTEFs, including responsive implementation and awareness-raising mechanisms, in line with recommendations iii and vi. The draft Protocol on the Conduct of Members of the Government of the Republic of Slovenia for the Management of Corruption Risks (DOP) is a promising step, as is the new Action Plan for implementation of the Resolution on Prevention of Corruption, which include targeted measures on integrity and corruption prevention for PTEFs. Awareness-raising measures are also in the pipeline and well designed, including a requirement for all new public officials to undergo introductory training on ethics, integrity, and transparency within six months of assuming office. GRECO trusts that these positive measures will be implemented shortly, as anticipated by the authorities.

14. GRECO concludes that recommendations iii and vi have been partly implemented.

Recommendation v

15. *GRECO recommended ensuring that all contacts of persons entrusted with top executive functions with lobbyists and other third parties who seek to influence government decision-making are duly reported, including those from legal and authorised representatives of companies and interest groups.*
16. GRECO recalls that this recommendation remained partly implemented. GRECO recognised the steps taken to promote and raise awareness of lobbying in PTEFs, as well as the role of the CPC in monitoring the law's implementation and cross-checking reports. GRECO awaited additional information on how the legislative shortcomings it had identified regarding the scope of lobbying (notably, the definition of lobbying, the difference between lobbying and advocacy, exemptions of legal and authorised representatives of companies and interest groups) had been addressed.
17. The authorities indicate that the CPC has adopted two principled opinions to address loopholes related to lobbying, as identified by GRECO. Namely, the Opinion on Lobbying of Supervisory Boards' Members of Corporations² from June 2024 clarified the role of supervisory board members in corporations, outlining when their activities count as lobbying and the obligations that follow.
18. Furthermore, in December 2024 the Principled Opinion on Lobbying (effective January 2025) detailed the status and transparency obligations of legal and authorised

² https://www.kpk-rs.si/storage/uploads/a33b9e4d-996b-4e8f-a528-b41ac649a3ab/Pojasnilo_o_lobiranju_v_povezavi_s_clani_nadzornih_svetov_za_objavo_P.pdf

company representatives, including their exemption from registration but requirements to identify themselves and submit lobbying reports. This was prompted by a September 2024 Supreme Court of Slovenia ruling interpreting lobbying provisions under the Integrity and Prevention of Corruption Act. The updated guidelines clarify that elected representatives of an interest organisation that do not have a (legal) representative specifically provided for by law (e.g. associations, civil initiatives, housing communities) may carry out lobbying activities without the need to register or report. The Principled Opinion also provided further clarification on the exemptions outlined in Article 56a of the Law, helping to distinguish lobbying from advocacy. It emphasised that everyone engaged in lobbying activities, who does not fall under these exemptions, is required to register as a lobbyist. Additionally, the document was enhanced with practical case examples to further clarify the legal provisions.

19. GRECO notes that the Slovenian authorities have addressed the identified loopholes not through legislative amendments, but through relevant case law, guidance, and practical examples developed by the CPC. GRECO values the CPC's role in overseeing the implementation and enforcement of lobbying rules, including maintaining the register, monitoring lobbying activities, raising awareness, and ensuring compliance. GRECO understands that, based on the CPC's findings and experience with the practical application of lobbying legislation, further work may be undertaken in this area, including possible legislative adjustments.
20. GRECO concludes that recommendation v has been dealt with in a satisfactory manner.

Recommendation viii

21. *GRECO recommended (i) ensuring timely publication of the ministers and state secretaries' asset declarations and (ii) that substantive checking of these asset declarations be carried out by the Commission for the Prevention of Corruption.*
22. GRECO recalls that this recommendation remained partly implemented. Amendments to the IPCA, namely Article 46, had allowed the publication of changes in asset declarations as opposed to all data on income and assets reported previously. However, other than checking the timely submission and formal regularity of declaration forms, no measure had been taken to ensure substantive checks on asset declarations by the CPC.
23. The Slovenian authorities report limited progress on this front. No advancement has been made regarding part (i) of the recommendation. The Ministry of Justice and the CPC have begun early-stage discussions to identify priority areas for amending the IPCA to ensure full publication of asset information. No new information is available regarding part (ii) of the recommendation.
24. GRECO takes note of the ongoing intention of the authorities to introduce legislative amendments that would enhance the current disclosure system. This early work needs to effectively materialise in practice. GRECO regrets the lack of progress regarding substantive checking of asset declarations.
25. GRECO concludes that recommendation viii remains partly implemented.

Corruption prevention and promotion of integrity in respect of law enforcement agencies

Recommendation x

26. *GRECO recommended (i) enhancing risk management within the police, by further developing an intelligence collection plan to identify corruption problems and emerging trends, coupled with a regular assessment mechanism, which is adequately resourced, and aims at reducing or eliminating the identified risks; (ii) strengthening public reporting tools on integrity and corruption prevention measures in the police.*
27. GRECO recalls that this recommendation was partly implemented. The creation of various registers to manage police risks, along with the strengthening of human resources in this area, was still in progress. No information was submitted regarding the second part of the recommendation.
28. The Slovenian authorities indicate that the police has continued developing systems to manage corruption risks through records on conflicts of interest, secondary employment, lobbying contacts, and gifts. These tools help supervisors respond quickly and effectively to reports.
29. In this connection, records of gifts received by public institutions, including the Police, are publicly available on the [Erar](#) platform. There has been notable progress, with an increase in reported gifts (from 5 to 19) and secondary employment declarations (from 62 to 76) in the first half of 2025 compared to 2024.
30. The police provide public disclosure of lobbying contacts involving police officers. After registration, these contacts are published on the official police website under “Notices on Lobbying Contacts.”
31. The police website includes inputs on integrity and corruption prevention measures, featuring a [dedicated section on ethics and integrity](#). The [Internal Investigation and Integrity Division](#) cooperates with the CPC to implement the integrity plan and address issues related to non-public contacts (lobbying) and gifts that may be received by police employees.
32. Following GRECO’s Fifth Round Evaluation—which highlighted that internal security units’ growing responsibilities were not matched by adequate resources—the police took steps to strengthen these units. With the amendment to the Act on Internal Organisation, Job Classification, Posts, and Titles in the Police, internal security and integrity departments were also established in three police administrations on 1 July 2024. Each of them comprises five systematised positions dedicated to risk management and internal security, ensuring all police administrations now have specialised units responsible for managing corruption risks and enhancing internal security.
33. GRECO welcomes the measures taken by the police to address this recommendation, including the establishment of intelligence collection systems and the allocation of

additional resources to carry out regular risk assessment and management. The police has also further developed reporting tools on integrity and corruption prevention.

34. GRECO concludes that recommendation x has been implemented satisfactorily.

Recommendation xi

35. *GRECO recommends strengthening the existing mechanisms for career promotion and dismissal in the police in order to ensure that they are fair, merit-based and transparent, including abandoning the practice where the supervisor decides on this single-handedly. Particular attention should be paid to the recruitment and integration of women at all levels in the police structure.*
36. GRECO recalls that this recommendation was partly implemented. It welcomed the various measures to increase women's representation across all police levels and acknowledged efforts to establish fair, merit-based, and transparent promotion and dismissal procedures. However, GRECO regretted that promotions still relied on annual performance evaluation reports, prepared and finalised by a single individual, without adequate safeguards to prevent arbitrary and unilateral decisions.
37. The Slovenian authorities report that, in 2024, important reforms were introduced to the public sector appraisal and salary systems in Slovenia. Key changes include the abolition of promotions based on annual performance appraisals. The Public Sector Salary System Act, effective from 1 January 2025, now bases advancement on required periods of service rather than performance evaluations. Additionally, the new Public Employees Act, coming into force on 1 January 2026, links promotions to training completion, professional development, and time in rank, excluding annual appraisals from the process. Existing decrees on promotions will be repealed, and a new government decree will establish procedures for verifying promotion eligibility.
38. GRECO welcomes the measures taken over the years to strengthen career-related processes in the police, including the elimination of single-handed decision-making.
39. GRECO concludes that recommendation xi has been implemented satisfactorily.

Recommendation xii

40. *GRECO recommended developing an organisational strategy and practices to improve the management of conflicts of interest in the police, including through responsive advisory, monitoring and compliance mechanisms.*
41. GRECO recalls that this recommendation was partly implemented. An electronic register of conflicts of interest was in its pilot testing phase. GRECO awaited its full operation, along with the organisation of tailored trainings for superiors responsible for decision-making in this area.
42. The Slovenian authorities indicate that to improve conflict of interest management in the police, a dedicated register was established via a legal amendment. It records cases where officers may be involved in proceedings under potentially conflicting

circumstances and is followed by advisory support, as needed, and continuous monitoring by internal security and integrity units. After a trial phase, the register became fully operational and was presented to police leadership to secure endorsement and ensure effective implementation, alongside corruption risk measures based on data from existing registers. While the number of cases recorded remained stable (10 in both early 2024 and the current year), only one case resulted in a confirmed conflict of interest. The issue has also been integrated into police training to strengthen prevention efforts.

43. GRECO welcomes the development of a dedicated register for conflict of interest management, whose operability—including monitoring, advisory support, and compliance—is ensured by internal security and integrity units. It also welcomes the efforts made to inform senior police leadership and, more broadly, all officers about the existence of the register, including through training initiatives and dedicated information sessions.

44. GRECO concludes that recommendation xii has been implemented satisfactorily

Recommendation xiv

45. *GRECO recommended developing specific mechanisms for preventing and managing conflicts of interest after officers leave the police organisation.*

46. GRECO recalls that this recommendation was not implemented. No measures had been taken to prevent or manage conflicts of interest after police officers leave service.

47. The Slovenian authorities indicate that there have been no actual conflict-of-interest cases related to police officers leaving the force. The authorities highlight the requirement for police officers to comply with the Code of Conduct for public officials, as well as the possibility under labour law to terminate contracts in the event of breaches. In this context, the Code of Conduct for public officials, specifically Article 26 on Termination of Employment, states that a former public official must not work for any entity governed by public or private law for a specified period regarding any matter on which they worked or provided advice while performing public duties. Additionally, they must not use or disclose confidential information obtained as a public employee unless legally authorised to do so, and they must continue to act in accordance with the rules applicable during their public service. Further, pursuant to Article 27 of the Code of Conduct for public officials, a public employee must not treat former public employees more favourably or grant them any advantage when accessing public services. Recent regulatory changes, as reported in the previous compliance report, also include important provisions on data protection and secrecy obligations that continue to apply after leaving the police sector.

48. Moreover, the authorities refer to strict recruitment and vetting procedures in the police to address the phenomenon of reverse revolving doors (moves from the private sector into the public sector that may raise potential concerns about conflicts of interest or undue influence). Candidates are required to disclose prior employment, and the police assess any security risks or conflicts of interest based on the individual's circumstances. Once employed by the police, the applicable incompatibility regime for

police officers - updated following GRECO's recommendations and positively assessed in GRECO's Second Compliance Report - applies.

49. Finally, the authorities indicate that as part of the training programme on strengthening integrity, ethics, and respect for human rights (see also recommendation xv), the police will include content addressing conflicts of interest related to the revolving doors phenomenon. This will involve advisory mechanisms for managing such conflicts, emphasising employees' duty to comply with the relevant provisions outlined in the Code of Conduct for public officials, as described above.
50. GRECO takes note of the new information provided by the authorities, which completes the picture of the regulatory framework applicable to police officers, including their obligations as public officials. GRECO also notes the police's intention to raise awareness of this important issue within their ranks. While the authorities consider this a non-issue in Slovenia due to the absence of cases, GRECO encourages them to continue monitoring the matter closely.
51. GRECO concludes that recommendation xiv has been dealt with in a satisfactory manner.

Recommendation xv

52. *GRECO recommended (i) resorting to a more systemic use of the multiple-eye principle, whenever possible, and (ii) strengthening the protection of whistle-blowers and making sure that all officers are well informed of the available channels to report wrongdoing in the workplace.*
53. GRECO recalls that this recommendation was considered partly implemented. The first part, regarding the systemic use of the multiple-eye principle, was deemed complied with. Additional efforts, notably through regular training, were requested for the second part of the recommendation.
54. The Slovenian authorities indicate that the police has made significant efforts to promote organisational integrity following GRECO recommendations. A key element of these efforts has been the development of a comprehensive training programme focused on strengthening integrity, ethics, and respect for human rights. This programme targets all police officers and senior staff to raise awareness of ethical conduct and human rights in policing, thereby promoting professional accountability and enhancing public trust.
55. The training includes a mandatory annual basic course delivered through the EIDA e-classroom. This course educates officers on corruption risks, including secondary employment, gift acceptance, conflicts of interest, and internal reporting procedures. Officers are trained to recognise and respond to potential misconduct and are reacquainted with internal reporting channels during each session. Data from the e-learning platform helps monitor training completion rates, ensuring broad participation.
56. In addition to the basic training, a specialist three-day advanced course is offered, incorporating real-life case studies drawn from actual police procedures involving

corruption risks such as conflicts of interest, data misuse, and gift acceptance. The first session was held in June with 17 participants, and four sessions are planned annually, each accommodating up to 25 officers.

57. GRECO welcomes the development of a training programme, including both basic and advanced specialist courses, on ethics and integrity. The programme features a specific focus on whistleblowing, building on recent legislative and organisational developments following the transposition of the EU Whistleblower Directive. GRECO encourages the authorities to continue their efforts in this sensitive area, ensuring that officers are fully aware of their reporting obligations as well as their rights and protections when making such reports.

58. GRECO concludes that recommendation xv has been implemented satisfactorily.

III. CONCLUSIONS

59. In view of the foregoing, GRECO concludes that Slovenia has implemented satisfactorily or dealt with in a satisfactorily manner twelve of the fifteen recommendations contained in the Fifth Round Evaluation Report. Three recommendations have been partly implemented. More specifically, recommendations i, ii, iv, v, vii, ix, x, xi, xii, xiii, xiv and xv have been implemented satisfactorily or dealt with in a satisfactory manner, recommendations iii, vi and viii have been partly implemented.

60. Regarding persons entrusted with top executive functions (PTEFs), progress is noted. The lobbying guidelines have been updated to further clarify legislative provisions, and the Commission for the Prevention of Corruption (CPC) continues to play a key role in overseeing the implementation of lobbying rules, including maintaining the register, monitoring activities, raising awareness, and enforcing compliance. Several measures are underway to establish an integrity plan and improve the prevention of conflicts of interest within the government, although these plans have yet to fully materialise in practice. More efforts are needed to enhance transparency and the control of financial disclosures.

61. As regards law enforcement agencies (the Police), all recommendations have been met. This demonstrates the police's commitment to implementing GRECO's recommendations by enhancing systemic solutions to reduce corruption risks, reinforce personnel integrity, strengthen the policing profession's reputation, and promote organisational integrity.

62. In accordance with Rule 31 revised bis, paragraph 10 of GRECO's Rules of Procedure, the adoption of this Second Addendum to the Second Compliance Report terminates the Fifth Round compliance procedure with respect to Slovenia. The Slovenian authorities may, however, wish to inform GRECO of the developments concerning the implementation of recommendations iii, vi and viii which remains incomplete.

63. Finally, GRECO invites the Slovenian authorities to authorise, as soon as possible, the publication of the report, to translate it into the national language and to make the translation public.