

FIFTH EVALUATION ROUND

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

COMPLIANCE REPORT ON AZERBAIJAN

Summary

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

COUNCIL OF EUROPE

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COMPLIANCE REPORT ON AZERBAIJAN - SUMMARY

The publication of Evaluation and Compliance Reports shortly after their adoption is a long-standing practice among GRECO member States. This serves two important purposes: ensuring overall transparency of the GRECO process and facilitating the implementation of recommendations at domestic level by raising awareness of GRECO's findings across society.

The Fifth Round Compliance Report on Azerbaijan was adopted by GRECO at its 99th plenary meeting (17-19 March 2025) and the authorities were invited to authorise, as soon as possible, its publication, to translate it into the national language and make the translation public. Since then, confidentiality of the report has not been lifted.

At its 102nd plenary meeting (27 March 2026), GRECO decided that, pursuant to Rule 35, paragraph 2 of the Rules of Procedure, and in the absence of authorisation from the authorities to publish the entire report, a summary of the report be made public within six months from its adoption. Accordingly, this summary is made public on 1 June 2026.

The following are the conclusions from the Fifth Round Compliance Report on Azerbaijan¹.

128. In the light of the foregoing, GRECO concludes that Azerbaijan has implemented satisfactorily four of the 31 recommendations set out in the Fifth Round Evaluation Report. Of the outstanding twenty-seven recommendations, ten recommendations have been partly implemented and seventeen have not been implemented.

129. More specifically, recommendations xx, xxii, xxviii and xxx have been implemented satisfactorily, recommendations iii, v, vii, xviii, xix, xxi, xxiii, xxiv, xxvii and xxxi have been partly implemented and recommendations i, ii, iv, vi, vii to xvii, xxv, xxvi and xxix have not been implemented.

130. With regard to top executive functions (PTEFs), nearly no progress has been achieved, as only three recommendations in this section have been partly implemented. The preparation of a corruption risk assessment methodology is in progress, which should pave the way for risk assessments in central government, followed by the development of a targeted anti-corruption policy addressing specific risks for PTEFs. The tasks of the Anti-Corruption Commission now include reporting to the public on the implementation of the anti-corruption policy and issuing recommendations to state bodies. All members of the Commission have a fixed term of office, but the rules for their appointment are yet to be supplemented with objective criteria based on merit and enhanced transparency. As for other areas fundamental to transparency, corruption prevention, integrity and accountability in central government, some reflection and analyses are said to be underway. However, issues addressing the regulatory framework with regard to persons in top executive functions, their vetting, ethics and integrity principles, awareness-raising, rules on interaction with lobbyists, conflicts of interest, incompatibilities, gifts, post-employment restrictions and financial disclosure have not been acted upon. Further, improving the transparency of draft laws emanating from the executive and access to information remain a challenge. Finally, no concrete steps have been reported with regard to reviewing legislation for lifting the immunities of the President, Vice-Presidents and Prime Minister to provide for proceedings that do not hamper or prevent criminal investigations and

¹ GrecoRC5(2025)6.

prosecution for corruption-related offences. In light of the above, GRECO strongly urges the Azerbaijani authorities to address the concerns underlying the recommendations and take more resolute action to implement them in the near future.

131. With regard to law enforcement, progress is more noticeable. The adoption of a dedicated anti-corruption strategy for the Ministry of the Interior, based on a prior risk assessment, the approval of a new Police Code of Ethics, and the introduction of a targeted programme to promote the representation of women in the Police are all to be welcomed. The Police Code of Ethics, in addition to providing a more comprehensive ethical framework for police employees, also addresses a number of adjacent issues that are fundamental to strengthening transparency and accountability in law enforcement. Notably, it now requires that instructions and orders issued to police employees be formalised in writing, and police officers are given the opportunity to challenge orders they believe to be unlawful. An express prohibition on receiving donations from individuals and legal entities has been introduced, along with restrictions on gifts, rules for the accounting and registration of permissible gifts. Another important development is the establishment of a position, in the Ministry of the Interior, of an integrity official responsible for providing confidential counselling and advice. Notable progress has been observed regarding responses to information requests received through social networks and the website of the Ministry of the Interior, but further progress is needed to ensure easy public access to information concerning different sectors of police activity and decision-making (including administrative proceedings, statistics, budget etc.). Police employees are now required to report misconduct and wrongdoing related to integrity, and some provisions have been introduced to protect such persons from retaliation. However, these need to be enshrined in law and accompanied by an adequate protection mechanism. Finally, determined steps should be taken to enhance the objectivity of promotion procedures, carry out integrity checks, and ensure that all police employees effectively submit declarations of assets and interests, which should then be properly verified.

132. In the light of the foregoing, GRECO notes that further progress will need to be made within the next 18 months to achieve an adequate level of compliance with the recommendations. In accordance with Rule 31 revised bis, paragraph 8.2, of its Rules of Procedure, GRECO calls on the Head of the delegation of Azerbaijan to submit additional information with regard to the implementation of the outstanding recommendations, namely recommendations i to xix, xxi, xxiii to xxvii, xxix and xxxi by 30 September 2026.

The adoption of the present summary does not in any way substitute for the publication of the full 5th Round Compliance Report. GRECO therefore invites the authorities of Azerbaijan to authorise its publication as soon as possible.