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FIFTH EVALUATION ROUND

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

ADDENDUM TO THE SECOND COMPLIANCE REPORT

SWEDEN



Adopted by GRECO
at its 99th Plenary Meeting (Strasbourg, 17-19 March 2025)



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

COUNCIL OF EUROPE



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I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (persons entrusted with top executive functions, PTEFs) and law enforcement agencies (LEA)".
2. This Addendum to the Second Compliance Report assesses the measures taken by the authorities of Sweden to implement the recommendations issued in the Fifth Round Evaluation Report on Sweden which was adopted at GRECO's 82nd Plenary Meeting (22 March 2019) and made public on 3 May 2019, following authorisation by Sweden. The Fifth Round Compliance report on Sweden was adopted by GRECO at its 87th plenary meeting (25 March 2021) and made public on 24 November 2021, following authorisation by Sweden. The Second Compliance Report was adopted by GRECO at its 94th plenary meeting (9 June 2023) and made public on 15 November 2023, following authorisation by Sweden.
3. As required by GRECO's Rules of Procedure,¹ the authorities of Sweden submitted a Situation Report on measures taken to implement the recommendations contained in the Evaluation Report. This report was received on 30 September 2024 and served as a basis for this Addendum to the Second Compliance Report.
4. GRECO selected Finland (with respect to top executive functions in central governments) to appoint a Rapporteur for the compliance procedure. The Rapporteur appointed was Mr Mikko HELKIÖ. He was assisted by GRECO's Secretariat in drawing up this report.

II. ANALYSIS

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

Regarding central governments (top executive functions)

Recommendation i

6. *GRECO recommended developing and implementing a strategy, based on a risk analysis, to promote integrity and improve the prevention and management of conflicts of interest and corruption among persons entrusted with top executive functions*
7. GRECO recalls that this recommendation was partly implemented. GRECO had taken note of the anti-corruption plan for public administration, which was running until the end of 2023 and of the evaluation work of this plan by the Swedish Agency of Public

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.

Management. However, while formally covering state secretaries and political advisers as part of the Government Offices, the plan contained no measures, tools or recommendations targeting specifically PTEFs, or the Government as a central agency. GRECO hoped that the further action to be decided on the basis of the Agency's evaluation would take into account this category of persons and their specific risks.

8. The authorities of Sweden report that in July 2024, a new action plan against corruption and unauthorised influence² was adopted by the Government. It is much broader in scope than the previous action plan and includes measures in several different focus areas: conflicts of interest, criminal law, unauthorised influence, combatting corruption in central government agencies as well as at the subnational level, and public procurement.
9. The action plan targets public administration in general, including central government agencies and the Government Offices. Risks specific to PTEFs and political parties are addressed under the section of the action plan that deals with conflicts of interest. The actions in this focus area include specific measures targeting PTEFs and political parties such as post-employment restrictions, financing of political parties and transparency of lobbying. The relevant measures include two committees of inquiry, which are described in further detail under recommendations v and vi. Concerning central government agencies, the action plan proposes *inter alia* a revision of existing regulations clarifying the responsibilities of all central government agencies to prevent corruption. The action plan also includes an enhanced evaluation regime for central government agencies, incorporating elements such as an evaluation of what measures agencies have implemented to prevent corruption, if the staff has knowledge about these measures and how they rate the quality of the measures. In addition, the evaluation will include information on the extent of personal experience amongst the staff of corruption or unauthorised influence.
10. Moreover, the Government Offices have decided to include, as one of the priority areas for internal audit during 2024, to look at how the Government Offices are working to prevent irregularities, including how to prevent corruption specifically. The Government Offices have revised their Guidelines on gifts and invitations. These guidelines are especially designed for PTEFs in the Government Offices. In this process, a risk analysis has been made to encompass among other aspects, the risk of corruption. The revised guidelines have entered into force on 1 November 2024.
11. Finally, the Swedish Agency for Public Management has also been tasked to promote anticorruption efforts in central government agencies by means of a strengthened approach to outreach activities. Work is ongoing and the Agency is prioritising those agencies that lag behind and thus have stronger need to improve their anticorruption efforts, as well as agencies that have been identified as being active in high-risk areas.
12. GRECO welcomes the information provided as regards the new action plan against corruption and unauthorised influence adopted by the Government in July 2024, which

²[Ny handlingsplan mot korruption och otillåten påverkan - Regeringen.se](#) (in Swedish only)

contains measures targeting specifically PTEFs. It also welcomes the information regarding the internal audit focus for 2024, the revised guidelines on gifts and invitations, as well as the awareness-raising work of the Swedish Agency for Public Management. These measures and initiatives appear to fulfil the requirements of the recommendation and GRECO is confident that they will contribute to promote integrity and improve the management of conflicts of interest for PTEFs.

13. GRECO concludes that recommendation i has been dealt with in a satisfactory manner.

Recommendation v

14. *GRECO recommended (i) introducing rules and guidance on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties seeking to influence governmental processes and decisions; and (ii) that sufficient information about the purpose of these contacts be disclosed, such as the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion*
15. GRECO recalls that this recommendation was not implemented in the previous reports.
16. The Swedish authorities communicate that on 15 June 2023, the Government appointed an all-party committee of inquiry to review the regulation on transparency in the financing of parties. The committee's terms of reference³ includes consideration of the need to strengthen transparency in political decision-making through legislation on the transparency of contacts between political decision-makers and lobbyists. Reference is made in the committee's terms of reference to Recommendation CM/Rec(2017)2 of the Committee of Ministers to member States on the legal regulation of lobbying activities in the context of public decision making. Reference is also made to GRECO's recommendation on the introduction of rules and guidance on contacts with lobbyists. The committee must report on its work by 15 May 2025 at the latest.
17. GRECO welcomes the appointment by the Government of an all-party committee of inquiry to consider, *inter alia*, the need to strengthen transparency in political decision-making through legislation on the transparency of contacts between political decision-makers and lobbyists. It notes that the committee's terms of reference take due account of the present recommendation and of the Committee of Ministers' recommendation on lobbying activities. It looks forward to being informed of the results and follow-up to the committee's work. However, it is too early at this stage to conclude that the recommendation has been implemented, even partly.
18. GRECO concludes that recommendation v remains not implemented.

Recommendation vi

19. *GRECO recommended that an independent assessment of the implementation of the "Act concerning restrictions when ministers and state secretaries transition to non-state*

³ <https://regeringen.se/rattsliga-dokument/kommittedirektiv/2023/06/dir.-202388> (in Swedish only)

activities” be conducted (regarding in particular the persons covered and the length of the restriction period) and that the Act be amended, if necessary, in view of its results

20. It is recalled that this recommendation was partly implemented. GRECO had welcomed in its previous report the on-going independent assessment of the implementation of the Act concerning restrictions when ministers and state secretaries transition to non-state activities (the Restrictions Act). It was looking forward to being informed about the follow-up given to this assessment.
21. The Swedish authorities recall that in June 2022, a committee of inquiry was appointed by the Government with the purpose of: 1) evaluating whether the objectives of the 2018 Restrictions Act have been achieved and assess whether the categories of persons subject to this Act should be expanded; and 2) examining the prevalence of transitions from public to non-public sector activities and propose generally applicable restriction regulations. In August 2023, the committee of inquiry submitted its report titled “Transitory restrictions – increased trust in public sector activities”⁴.
22. The inquiry concluded that the Restrictions Act had fulfilled its purpose. It had self-regulating effects and compliance with the duty of notification has been consistent. The inquiry found that the twelve-month transition period remains adequate, and it did not recommend any extension. Furthermore, it identified no need for the introduction of sanctions, as no compliance issues were observed during the review period (2018-2023).
23. As part of its mandate, the inquiry assessed whether the personal scope of the Restrictions Act should be expanded to include additional categories of persons. The inquiry concluded that no further categories of PTEFs, including political advisers, should be subject to the transitory restriction regulations under the Restriction Act. However, the inquiry identified individuals in fixed-term senior management positions at government authorities, such as heads of central government agencies, occupying positions that could in themselves entail a risk of conflicts of interest when they move to private sector activities. Therefore, the inquiry proposed that these positions be subject to the transitory restriction regulations under the Restrictions Act, in the same way as government ministers and state secretaries.
24. The inquiry also proposed generally applicable restriction regulations encompassing the entire public sector, in addition to proposed amendments to the Restrictions Act. The personal scope of these regulations would encompass positions in the public sector for which the employer has determined certain risks upon transition of the holder of the position to the private sector. Such risks include access by the employee to information that could pose a risk of financial damage to public sector activities, provide an undue advantage to an individual or damage public confidence in the public administration. Each central government agency would be required to assess which positions should be subject to the regulation and to include the post-employment restrictions in the relevant work contracts. Accordingly, these restrictions could apply to political advisers if so decided by the head of the Government Offices. The inquiry report has been circulated

⁴ [Övergångsrestriktioner – ökat förtroende för offentlig verksamhet - Regeringen.se](#). (In Swedish, with summary in English on p. 21 ff.)

for consultation and the proposals contained therein are currently under active consideration within the Government Offices.

25. GRECO takes note of the conclusions of the independent assessment of the Restrictions Act, namely that the Act has fulfilled its purpose, that no compliance issues were observed during the review period (2018-2023) and that the inquiry does not recommend an extension of the twelve-month transition period. It also notes that the inquiry recommended some amendments to the Act, which would include additional restrictions which could potentially apply to political advisers if so decided by the Government Offices. The inquiry also recommended specific restrictions for certain fixed-term senior management positions in the Government Offices, such as for heads of central government agencies. Finally, it notes that the Government Offices is currently considering the follow-up to be given to these recommendations and it looks forward to being informed of possible amendments to the Act.
26. GRECO concludes that recommendation vi remains partly implemented.

Recommendation vii

27. *GRECO recommended (i) enshrining in legislation the obligation for ministers, state secretaries (as well as political experts, as appropriate) to declare significant liabilities, previous positions, agreements with previous employers, agreements with current or future employers or clients and (ii) considering providing information on their spouses and dependent family members (it being understood that such information would not necessarily need to be made public)*
28. GRECO recalls that this recommendation was not implemented, in the absence of measures taken to give effect to it.
29. The Swedish authorities provide no new information.
30. In the absence of new elements, GRECO concludes that recommendation vii remains not implemented.

Recommendation viii

31. *GRECO recommended that declarations submitted by persons entrusted with top executive functions be subject to substantive control*
32. GRECO recalls that this recommendation was partly implemented. It had acknowledged in previous reports that the Government Offices carry out substantive control of the elements that are currently included in the declarations of assets and interests, namely financial instruments. However, it had taken the view that substantive control should also cover additional elements to be included in the broader declaration system to be introduced according to recommendation vii.

33. The Swedish authorities recall that ministers and state secretaries must report their financial instruments as soon as possible after taking office. Reporting is also to be made annually by 31 January, even if the holdings have not changed. In addition, any change in a PTEF's holdings must be reported to the Government Offices within 7 days of the change.
34. In the report on holdings, the ministers or state secretaries must provide complete information about the financial instruments held and the market value at the time of reporting. In a report on acquisition or transfer, information must be provided about the financial instruments acquired or transferred and the price at which the acquisition or transfer took place. The date of the acquisition or transfer must also be reported, as well as the market value after the change. The report must be made by the minister or state secretary, submitting a copy or printout of a summary statement from a bank or security broker, including the above-mentioned elements. The Government Offices verify the accuracy of the reports based on the elements provided.
35. All ministers and state secretaries act in accordance with this procedure. In 2024, 20 out of 24 ministers reported that they had holdings of financial instruments and 4 reported that they had no holdings; 35 out of 37 state secretaries reported that they had holdings of financial instruments and 2 that they had no holdings. These reports were verified as stated above.
36. GRECO notes, as it already did in previous reports, that the Government Offices carry out substantive control of the elements that are currently included in PTEFs' declarations of assets and financial interests. It also takes note of the information provided as regards declarations submitted in 2024 and the control thereof. Overall, therefore, this recommendation may be regarded as dealt with in a satisfactory manner.
37. GRECO concludes that recommendation viii has been dealt with in a satisfactory manner.

Recommendation ix

38. *GRECO recommended that a mechanism of supervision and enforcement be instituted in respect of compliance by persons entrusted with top executive functions with rules of conduct*
39. GRECO recalls that this recommendation was not implemented.
40. The Swedish authorities report that the Government appointed in February 2024 a committee of inquiry to oversee the criminal law legislation on corruption offences. It is tasked *inter alia* to consider whether criminal liability for official misconduct should be expanded and, regardless of the position taken, to present legislative proposals so that liability for official misconduct is expanded to also include matters other than measures taken in the exercise of public authority. Furthermore, the inquiry will consider whether criminal liability should be expanded to cover measures taken by persons included in the current exception for elected representatives. The proposals of the inquiry could

thus lead to an expanded criminal liability for certain PTEFs. The inquiry's final report will be presented by 25 July 2025. Furthermore, the authorities make reference to the ongoing digitalisation of the core processes in the Government Offices, which will enable conflicts of interest to be identified to a greater extent. This digitalisation process now enables PTEFs to indicate, via a digital interface, if they have a conflict of interest at an earlier stage in the process of preparing government decisions.

41. GRECO takes notes with interest of the on-going inquiry that may lead to an increased criminal liability for certain PTEFs who would be liable for official misconduct. As this inquiry is still on-going, however, it is too early to warrant a change in the status of implementation of this recommendation. GRECO also points out that the mechanism of supervision and compliance that is the subject of this recommendation also calls for measures that go beyond criminal law to a more institutionalised follow-up of compliance with rules of conduct by all PTEFs.
42. GRECO concludes that recommendation ix remains not implemented.

III. CONCLUSIONS

43. **In view of the foregoing, GRECO concludes that Sweden has implemented satisfactorily or dealt with in a satisfactory manner eleven of the fifteen recommendations contained in the Fifth Round Evaluation Report.** Of the remaining recommendations, one has been partly implemented and three have not been implemented.
44. More specifically, recommendations iii, x, xi, xii, xiii, xiv and xv have been implemented satisfactorily, recommendations i, ii, iv and viii have been dealt with in a satisfactory manner, recommendation vi has been partly implemented and recommendations v, vii and ix have not been implemented.
45. With respect to top executive functions, some positive initiatives have been launched or have made further progress since the last report. A new action plan against corruption and unauthorised influence has been adopted by the Government, which contains measures targeting specifically persons with top executive functions. An internal audit is focusing on how the Government Offices are working to prevent irregularities, including corruption. Guidelines of the Government Offices on gifts and invitations are under revision. The issues of transparency of contacts between political decision-makers and lobbyists, criminal liability for official misconduct, as well as post-employment restrictions are being examined in the framework of committees of inquiry and follow-up to their conclusions. Some of these initiatives have yet to fully bear fruit. It is also positive that the elements included in declarations of assets and interests by top executive officials are subject to an accuracy control by the Government Offices, but the material scope of these declarations needs to be widened. Work also remains to be done on other issues, such as supervision of compliance by top executive officials with rules of conduct. With respect to law enforcement authorities, GRECO recalls that all recommendations were fully complied with in its last report.

46. In accordance with Rule 31 revised bis, paragraph 10 of GRECO's Rules of Procedure, the adoption of this Addendum to the Second Compliance Report terminates the Fifth Round compliance procedure with respect to Sweden. The Swedish authorities may, however, wish to inform GRECO of the developments concerning the implementation of recommendations v-vii and ix which remains incomplete.
47. GRECO invites the authorities of Sweden to authorise as soon as possible the publication of the present report, to translate it into the national language and to make this translation public.