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FIFTH EVALUATION ROUND

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

COMPLIANCE REPORT

REPUBLIC OF MOLDOVA



Adopted by GRECO
at its 102nd Plenary meeting (Strasbourg, 23-27 March 2026)



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 concerns "Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies".
2. This Compliance Report assesses the measures taken by the authorities of the Republic of Moldova to implement the recommendations made in the [Fifth Round Evaluation Report](#) on the Republic of Moldova which was adopted by GRECO at its 95th plenary meeting (27 November – 1 December 2023) and made public on 12 March 2024, following authorisation by the Moldovan authorities.
3. As required by GRECO's Rules of Procedure,¹ the authorities of the Republic of Moldova submitted a situation report containing information on the measures taken to implement the recommendations of the Evaluation Report. This report was received on 30 September 2025 and, together with additional information provided by the authorities, served as a basis for the present Compliance Report.
4. GRECO selected Portugal (in respect of top executive functions in central governments) and the Slovak Republic (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Mr Antonio Delicado, on behalf of Portugal, and Ms Radka Moncoľová, on behalf of the Slovak Republic. They were assisted by GRECO's Secretariat in drawing up this report.
5. The Compliance Report assesses the implementation of each individual recommendation contained in the Evaluation Report and gives an overall appraisal of the level of the compliance with these recommendations. The implementation of any outstanding recommendations (whether partly or not implemented) will be assessed on the basis of a further situation report to be submitted by the authorities 18 months after the adoption of this Compliance Report.

II. ANALYSIS

6. GRECO addressed 25 recommendations to the Republic of Moldova in its Evaluation Report. Compliance with these recommendations is dealt with below.
7. By way of general observations, the authorities report that, in June 2024, the Republic of Moldova opened [accession negotiations](#) with the European Union (EU). Following a referendum in October 2024, the Constitution of the Republic of Moldova was subsequently [amended](#) to enshrine the EU integration as a fundamental principle in a dedicated Title V¹. Subsequently, a [national action plan](#) for 2024-2027 and a [national programme](#) for 2025-2029 for the country's accession to the EU were approved. According to the authorities, the latter incorporates GRECO's recommendations. Furthermore, a [national integrity and anti-corruption programme](#) for 2024-2028 and a corresponding action plan were approved.

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.

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

8. It is recalled that, in paragraphs 25, 26, 31 and 32 of the Evaluation Report, the President of the Republic, the Secretary General of the President's Office, Presidential Advisers and experts or consultants (non-tenured advisers), as well as the Prime Minister, the First Deputy Prime Minister, Deputy Prime Ministers, Ministers, State Secretaries of the Government, the Secretary General of the Government, and Secretaries of State of ministries, Ministerial Advisers as well as temporary experts and consultants (non-tenured advisers) were regarded as persons with top executive functions (PTEFs).

Recommendation i

9. *GRECO recommended that (i) clear rules on integrity checks be adopted so that persons with top executive functions undergo integrity checks as part of their recruitment in order to identify, avoid and manage potential and existing conflicts of interest; (ii) rules be laid down setting out the criteria for the appointment of Secretaries of State and State Secretaries of the Government; and (iii) the names, functions (responsibilities), salary and information on ancillary activities in respect of Presidential Advisers, Ministerial Advisers and experts or consultants (non-tenured advisers) be made public.*
10. The Moldovan authorities report that, regarding the first part of the recommendation, Presidential Advisers submit declarations of assets and personal interests, which are verified by the National Integrity Authority (ANI) and the Intelligence and Security Service. In addition, they sign a declaration of honour confirming compliance with the legal regime applicable to conflicts of interest, incompatibilities, restrictions and limitations. They also sign a statement acknowledging that they may be subject to a professional integrity test conducted by the National Anti-corruption Centre (CNA). As regards the second part of the recommendation, [Law no. 179/2025](#) amending certain normative acts now requires State Secretaries of the Government and Secretaries of State to meet the conditions laid down in [Law no. 199/2010](#) on the status of persons holding public office as well as additional criteria provided in Law no. 179/2025. Concerning the third part of the recommendation, the authorities indicate that information on Presidential Advisers is published [online](#), as are their [salaries](#).
11. GRECO notes that the authorities have not demonstrated that specific rules on integrity checks for PTEFs have been adopted. The situation remains essentially the same as described in the Evaluation Report and consists primarily of security checks carried out by the intelligence service. The first part of the recommendation has therefore not been implemented. As regards the second part of the recommendation, GRECO notes that criteria for the appointment of Secretaries of State have now been introduced in the legal framework, thereby meeting the requirements of this component. Concerning the third part, only information concerning Presidential Advisers is published. No progress

has been made regarding the publication of information relating to Ministerial Advisers². This part has therefore been partly implemented.

12. GRECO concludes that recommendation i has been partly implemented.

Recommendation ii

13. *GRECO recommended that (i) the adoption and/or review, as appropriate, of registers of institutional corruption risks be broadened to cover more specifically persons with top executive functions and the registers be updated regularly, and (ii) periodic progress reports on their implementation be made public.*

14. The Moldovan authorities report that the register of fraud and corruption risks of the President's Office has been revised and is currently undergoing internal consultation with a view to finalising a consolidated version. The President's Office has further indicated that, following a review of the practice of other countries, risks concerning the President's Office are generally integrated into the general national framework for the prevention and combating of corruption. In addition, Parliament adopted the [National Integrity and Anti-Corruption Programme](#) (NIAP) for 2024–2028 in December 2023.

15. GRECO recalls that, for the purposes of this report, the President of the Republic, the Secretary General of the President's Office and political advisers were considered PTEFs (see paragraph 8 above). As such, the recommendation requires that corruption risks for these functions be identified and addressed within the relevant risk register. The President's Office is currently in the process of finalising its corruption risks register, which will be assessed in due course. However, no tangible progress has been reported regarding the existence or review of comparable registers covering the remaining PTEFs³. It remains for the authorities to determine the form of risk registers for PTEFs. The existence of a general national risk management framework may suffice only if it identifies corruption risks associated with all PTEFs, including those within the President's Office. In these circumstances, GRECO considers that neither part of this recommendation has been implemented, even partly.

16. GRECO concludes that recommendation ii has not been implemented.

Recommendation iii

17. *GRECO recommended that (i) code(s) of conduct for persons with top executive functions, covering all relevant integrity matters (conflicts of interest, incompatibilities, gifts, contacts with lobbyists and third parties, post-employment restrictions, asset declarations, the handling of confidential information and ancillary activities), be adopted and made public, together with practical guidance, and (ii) the code(s) of*

² At GRECO's 102nd plenary meeting, the Moldovan authorities presented factual updates, which, in their view, reflect certain progress in implementing the third part of this recommendation. These developments will be examined by GRECO in the next compliance report.

³ At GRECO's 102nd plenary meeting, the Moldovan authorities presented factual updates, which, in their view, reflect certain progress in implementing the first part of this recommendation. These developments will be examined by GRECO in the next compliance report.

conduct be coupled with a credible and effective mechanism for supervision and enforcement, including appropriate sanctions.

18. The Moldovan authorities report that a code of ethics and conduct for the President's Office has been drafted and is currently undergoing internal consultation. The draft code sets out principles of conduct, including integrity, transparency, confidentiality and accountability, and contains provisions on various integrity matters, including conflicts of interest, asset declaration, contacts with third parties and the protection of confidential information. It also provides for a monitoring mechanism and establishes liability in case of breaches.
19. In addition, the authorities indicate that an inter-institutional working group was established and has developed a draft code of conduct and professional ethics for persons holding public dignity positions and persons employed in their cabinets, i.e. advisers and consultants. The draft will be subject to public consultation, per announcements put at <https://gov.md> and www.particip.gov.md.
20. GRECO notes that a draft code of conduct for the President's Office is currently under internal consultation with a view to its finalisation. It covers relevant integrity matters and provides for a mechanism of supervision and enforcement, including liability for breaches. A draft code of conduct for the remaining PTEFs has also been developed. Given that neither code has yet been adopted, GRECO considers that this recommendation has been partly implemented.
21. GRECO concludes that recommendation iii has been partly implemented.

Recommendation iv

22. *GRECO recommended that (i) dedicated awareness-raising trainings or briefings of persons with top executive functions on integrity related matters be systematically provided, when taking up their positions and at regular intervals thereafter, and (ii) confidential counselling on integrity related issues be made available and documented.*
23. The Moldovan authorities indicate that no progress has been made in implementing this recommendation.⁴
24. In view of the absence of progress, GRECO concludes that recommendation iv has not been implemented.

Recommendation v

25. *GRECO recommended that (i) effective measures be taken to ensure compliance with the obligations stemming from the statutory provisions of the freedom of information legislation as regards proactive transparency, the creation of a register of requests for*

⁴ At GRECO's 102nd plenary meeting, the authorities presented factual updates, which, in their view, reflect certain progress in implementing the first part of this recommendation. These developments will be examined by GRECO in the next compliance report.

public interest information, the handling of requests for public interest information within the statutory time-limit, and the proportionate application of the legitimate grounds for limitations of access to public interest information, and (ii) regular awareness-raising training on the freedom of information legislation be provided to persons exercising top executive functions and those responsible for its implementation at the Government level.

26. The Moldovan authorities report that in 2024 the President's Office established a register of requests for access to public interest information in order to ensure systematic record-keeping and monitoring of their treatment. In addition, a standard website template for central authorities, including ministries, was developed in order to ensure compliance with proactive transparency requirements under [Law no. 148/2023](#) on access to public interest information. In 2024 and 2025 monitoring of these websites was carried out, and the findings were documented in two internal reports. According to the authorities, the reports found that the compliance rate with the proactive transparency was 84%. The main challenges concerned, amongst other things, uneven publication of information, incomplete information for certain categories, such as decision-making processes and financial transparency, limited accessibility of the websites for persons with disabilities and the need to adapt website to accessibility requirements. Furthermore, [Government decision no. 1027/2023](#) established the procedure for registering requests for access to public interest information, together with templates and instructions for keeping such registers. In 2024, it was decided to integrate these registers into the [e-democracy platform](#), noting that access to the registers is restricted to authorised individuals.
27. The Ombudsman's Office examined seven applications in 2024 and three in 2025 alleging breaches of Law no. 148/2023. The main issues identified concerned the quality of responses, including formalistic, evasive and incomplete replies by the authorities, as well as the refusal to disclose information on the grounds of personal data protection. At the same time, public authorities generally met the statutory time-limits for processing information access requests. Staff of the Ombudsman's Office also received training on the application of the relevant legal framework.
28. As regards the second part of the recommendation, a [practical guide](#) on the implementation of Law no. 148/2023 was developed and disseminated to all relevant authorities in order to support the handling of information requests within the time-limit and the proportionate application of restrictions on access to information. Between November 2023 and November 2025, 13 training sessions were organised for almost 600 civil servants who are directly responsible for the implementation of the law at central level, in addition to training activities organised for local authorities. The National Institute of Public Administration and Management has also updated its online course on access to information, consisting of 13 e-learning modules, which has been attended by 2 235 civil servants. Another e-learning course is being developed, and additional trainings are planned.
29. GRECO notes that, regarding the first part of the recommendation, standardised website templates have been developed. Monitoring of website content has been carried out to

ensure compliance with statutory proactive transparency requirements. Registers of requests for access to public interest information have been established. In addition, practical guidance has been developed and disseminated in order to support compliance with statutory time-limits and the appropriate application of restrictions on access to public interest information. The Ombudsman has examined individual applications and identified shortcomings mainly related to the quality of responses. Despite these shortcomings and other ongoing challenges in ensuring full compliance with proactive transparency requirements, the average compliance rate remained high, at 84%. Taken together, these measures lead GRECO to conclude that this part of the recommendation has been dealt with in a satisfactory manner.

30. Concerning the second part of the recommendation, GRECO welcomes the provision of extensive training on freedom of information legislation to civil servants, including staff of the Ombudsman's office. However, it notes that no such training has been provided specifically to PTEFs. This part of the recommendation is therefore considered partly implemented.
31. GRECO concludes that recommendation v has been partly implemented.

Recommendation vi

32. *GRECO recommended that (i) a study be undertaken to assess the effectiveness and quality of public consultation and, in the light of its findings, remedial measures be taken; (ii) the minimum statutory timelines for public consultation be increased; and (iii) a unified portal documenting the entire process of drafting a normative act, the conduct of public consultation and the decision-making by the Government be put in place.*
33. The Moldovan authorities report that, with regard to the first part of the recommendation, a [study](#) assessing public consultation practices was carried out. It identified major challenges and made corresponding recommendations, following which the process for revising the law on public participation in decision-making was initiated in February 2025. The draft law is currently pending adoption by the Government, following public consultations held with central and local authorities as well as civil society representatives. Government decision no. 967/2016 on the consultation mechanism will also be revised to implement the new draft law. Additional support activities, such as the preparation of a guide on conducting public consultation, the development of a training curriculum and the delivery of dedicated training sessions, are ongoing.
34. As regards the second part, the authorities indicate that a minimum deadline of ten working days is provided for submitting proposals and recommendations during the pre-consultation phase, which consists of collecting proposals and recommendations at the initial stage of preparation, followed by an additional ten working days during the public consultation phase. Furthermore, if the draft legislative act is supplemented with new aspects and concepts, or if more than 30% of the original text is amended, the draft must be resubmitted for public consultation.

35. Concerning the third part of the recommendation, the authorities report that an internal analysis of the <https://particip.gov.md/ro> has been carried out, leading to the launch of a process for its modernisation in order to ensure transparency at every stage of the decision-making process. The portal will become a centralised digital platform enabling stakeholders to access public authorities' decision-making processes and to participate therein in accordance with the regulatory framework. The Ombudsman's office, which is responsible for monitoring this platform, has noted that most public policy drafts are published for consultation within the statutory time-limits. However, there are instances when certain drafts are not available for consultation at the time of verification on the authorities' website, or where the time allocated for consultation is insufficient. In addition, the State Chancellery is developing [e-legislation portal](#) to be used by central authorities to document the initiation, drafting and adoption of normative acts by the Government.
36. GRECO notes that, regarding the first part of the recommendation, the authorities have carried out a study which resulted in proposals to amend the regulatory framework. The drafting of a new law on public participation in decision-making is pending adoption by the Government before being transmitted to parliament for enactment. This part of the recommendation has therefore been partly implemented. With respect to the second part of the recommendation, the statutory consultation time limits remain unchanged compared to those described in the Evaluation Report. This part has therefore not been implemented. Concerning the third part of the recommendation, the existing public consultation platform is currently undergoing modernisation, and an e-legislation portal intended to document the full lifecycle of normative acts is under development. This part is therefore considered partly implemented.
37. GRECO concludes that recommendation vi has been partly implemented.

Recommendation vii

38. *GRECO recommended that (i) rules on how persons with top executive functions engage in contacts with lobbyists and other third parties who seek to influence the government's decision-making processes, decisions and other activities be introduced, and (ii) sufficient information about the purpose of these contacts be disclosed such as the identity of the person(s) with whom (or in whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion.*
39. The Moldovan authorities indicate that, in December 2025 the CNA received a discussion paper on preventing undue influence in public decision making, which is guiding ongoing consultations amongst relevant authorities on the possibility of establishing separate legislation on lobbying. The paper has not been made public.
40. GRECO notes that a discussion paper has been prepared and consultations are ongoing. However, in the absence of tangible progress in addressing both parts of the recommendation, it considers that the recommendation has not been implemented.
41. GRECO concludes that recommendation vii has not been implemented.

Recommendation viii

42. *GRECO recommended that the internal audit service of the President's Office and all Ministries, including the State Chancellery, become fully staffed and fully operational.*
43. The Moldovan authorities report that the internal audit function of the President's Office is currently exercised through the Working Group on the organisation and implementation of the financial management and control system. It is chaired by the Deputy Secretary General and composed of heads of internal departments. As the President's office does not manage complex budgetary programmes, large-scale public funds or major sectoral policies or investment projects, establishing a separate internal auditor position is neither justified nor proportionate, as it would generate extra costs without significant added value. They further indicate that both positions in the Internal Audit Service of the State Chancellery have been filled.
44. GRECO notes that, regarding the President's Office, a working group composed of heads of departments responsible for implementing financial management and control cannot be considered equivalent to an internal audit service. The current arrangement does not ensure the functional independence and separation of roles required for effective internal audit, as it involves officials exercising oversight over systems and activities for which they are themselves responsible. The absence of a formal dedicated internal audit and control service, with a clear mandate, structure and professional independence had also been highlighted by the Court of Accounts (see paragraph 65 of the Evaluation Report). Such a function constitutes a key element of internal managerial control, irrespective of the size or complexity of the institution. It remains for the President's Office to determine the organisational form of this function, whether exercised by a single independent internal auditor or by a dedicated independent unit.
45. GRECO further notes that the State Chancellery's internal audit service appears to be fully staffed and operational. However, no information has been provided about the staffing levels and operational capacity of internal audit services in the ministries⁵.
46. GRECO concludes that recommendation viii has been partly implemented.

Recommendation ix

47. *GRECO recommended that the system for managing conflicts of interest of persons with top executive functions be strengthened by (i) providing a clear definition of perceived (apparent) conflict of interest; (ii) ensuring that persons with top executive functions step aside from the decision-making process in the case of a potential, perceived (apparent) or real conflict of interest, and (iii) publishing registers of declaration of conflicts of interest.*

⁵ At GRECO's 102nd plenary meeting, the authorities presented factual updates, which, in their view, reflect certain progress in implementing this recommendation. These developments will be examined by GRECO in the next compliance report.

48. The Moldovan authorities report that the ANI is examining possible amendments to the legal and regulatory framework to address the first two parts of the recommendation. ANI continues to encourage PTEFs to abstain from decision-making in cases of potential or actual conflicts of interest. The authorities further indicate that declarations of assets and personal interests are available [online](#), while a new module of the e-Integrity system is being developed. The module will include a nationwide register of conflicts of interests declared or submitted by officials to heads of public authorities, the ANI or the Integrity Council. Aggregated statistical data on declared conflicts of interest will be made public in accordance with transparency and data protection principles.
49. GRECO emphasises that encouragement to abstain does not amount to a binding legal obligation. In this context, it notes the authorities' intention to amend the legal and regulatory framework to implement the first two parts of the recommendation, namely by introducing a definition of perceived (apparent) conflict of interest and establishing an obligation for PTEFs to abstain from decision-making when they are in a potential, perceived or real conflict of interest. GRECO further considers that, as part of the envisaged amendments, alternative decision-making mechanisms may be introduced to prevent institutional paralysis when PTEFs abstain from decision-making. These may include, for example, automatic delegation, quorum rules or substitution by another senior officeholder, combined with a clear and standardised abstention procedure. Pending the adoption of concrete legislative or regulatory measures, neither of the first two parts of the recommendation has been implemented. As regards the third part of the recommendation, GRECO notes the ongoing development of a conflict-of-interest module within the current e-Integrity system. Pending its operationalisation and the publication of declarations of conflicts of interest, this part of the recommendation has not yet been implemented.
50. GRECO concludes that recommendation ix has not been implemented.

Recommendation x

51. *GRECO recommended that (i) an effective supervision mechanism be established to implement the rules on post-employment restrictions in respect of persons with top executive functions, and (ii) the supervision mechanism be given the powers to impose adequate sanctions in case of breaches of the rules on post-employment restrictions.*
52. The Moldovan authorities report that work is underway to establish a centralised and efficient mechanism for monitoring compliance with post-employment restrictions. In this context, ANI has received assistance from international development partners and experts in analysing institutional monitoring models and sanctioning frameworks applicable to post-employment restrictions in other countries. They further indicate that ANI has disseminated instructions to central and local authorities on compliance with the restrictions, with no violations reported to date.
53. GRECO notes that ANI has undertaken preparatory work aimed at establishing a monitoring system of post-employment restrictions. It also notes the dissemination of guidance to public authorities. However, concrete legislative or regulatory measures are needed to establish a supervisory mechanism with enforcement powers, including the

possibility to impose sanctions. In the absence of such measures, neither part of the recommendation has been implemented.

54. GRECO concludes that recommendation x has not been implemented.

Recommendation xi

55. *GRECO recommended that (i) systematic (preferably annual), realistic and enforceable in-depth control of declarations be developed and implemented, and (ii) comprehensive statistics on the in-depth control of declarations and its results be made public on a regular basis.*
56. The Moldovan authorities report that, according to the law, at least 20% of in-depth controls concern persons holding positions of public dignity, including certain PTEFs. They further indicate that ANI publishes statistics on control results in its annual activity report.
57. According to the [2024 annual report](#), 80 654 declarations were filed via the e-Integrity system. Integrity inspectors completed 2 080 verifications and 201 in-depth control procedures concerning civil servants (68), public dignitaries (e.g. MPs, judges, prosecutors, pretors and mayors) (65), local councillors (38) and other persons. Of the 201 in-depth controls, 97 concerned compliance with the legal regime governing assets and personal interests, 61 with the regime governing conflicts of interest, 33 with the regime governing incompatibilities, and 10 with the regime of restrictions and limitations. A total of 140 violations were found as a result of in-depth controls, which represented an increase in violations concerning the regime governing assets and personal interests and incompatibilities, as well as a downward trend in respect of conflicts of interest.
58. In 2024, integrity inspectors initiated 572 administrative offence proceedings for failure to declare and resolve conflicts of interest and for breaches of the legal regime of incompatibilities, restrictions and limitations. Fines were imposed in 454 cases, chiefly for failure to submit declarations or for late submission thereof, for failure to declare a conflict of interest, and for breaches of the legal regime governing incompatibilities and restrictions. The majority of fines were imposed on local councillors and civil servants, with persons holding public office being the least sanctioned. Of the 92 court proceedings resolved in 2024, 87 cases were ruled in favour of ANI. At present, 41 positions within ANI's Integrity Inspectorate have been filled, with 15 posts remaining vacant.
59. The authorities also report that ANI has included specific objectives in its 2026 work plan relating to in-depth checks of PTEFs' declarations. In addition, a new version of the [e-Integrity](#) system is being developed, which will introduce automatic verification modules based on risk indicators and prioritise declarations by PTEFs. A tender has been conducted and completed, with the winning bidder selected following the evaluation of the submitted bids. The piloting of the revised e-Integrity system is expected to take place by December 2026.

60. GRECO notes that, concerning the first part of the recommendation, the information provided is comparable to the situation described in the Evaluation Report, which highlighted a very low number of in-depth controls relative to the total number of filed declarations. While more than 20% of in-depth controls in 2024 concerned public dignitaries, none specifically targeted PTEFs within the meaning of paragraph 8 of this report. GRECO further notes that 15 posts within ANI's Integrity Inspectorate remain vacant. This may affect the overall capacity to carry out a higher number of in-depth controls. That said, ANI has included specific objectives in its 2026 annual action plan for in-depth controls of PTEFs' declarations. A new version of the e-Integrity system is also being developed. It is expected to introduce automatic risk-based verification modules and prioritise PTEFs' declarations. GRECO looks forward to the implementation of these measures and to receiving updated information in the next report.
61. As regards the second part of the recommendation, GRECO notes that ANI's annual report contains statistics on in-depth controls. They include disaggregated data by category of official and type of legal regime concerned, as well as information on administrative offence proceedings, the imposition of sanctions and the outcome of judicial proceedings. GRECO further notes that this information provides a broader and more comprehensive picture that extends beyond the outcomes of in-depth controls. In these circumstances, GRECO considers that this part of the recommendations has been implemented.
62. GRECO concludes that recommendation xi has been partly implemented.

Recommendation xii

63. *GRECO recommended that an internal effective oversight mechanism be established within the National Integrity Authority in order to ensure consistency of decisions of integrity inspectors as well as an equal and fair distribution of the workload amongst integrity inspectors.*
64. The Moldovan authorities report that the President of ANI has the authority to standardise the work practice of integrity inspectors and to implement measures to unify these practices. In complex cases, the President may, by a reasoned decision, establish a group of inspectors to carry out a verification. ANI's Vice-President monitors the activities of integrity inspectors in relation to their performance and compliance with the verification and control methodology. In addition, ANI has adopted institutional measures to strengthen its regulatory framework, including the adoption of a methodology for the random distribution of in-depth control cases to ensure a fair workload distribution, the ongoing adjustment of verification and control methodology, the development of technical specifications for a new automated system to replace e-Integrity, and the adoption of ANI's development strategy for 2024-2028.
65. GRECO notes that legal and institutional measures have been put in place, which demonstrate concrete progress towards the implementation of this recommendation. Taken together, these measures have addressed the requirements of this recommendation in a satisfactory manner. GRECO expects that these measures will

contribute to consistent decision-making and a documented, equitable distribution of workload amongst integrity inspectors in practice.

66. GRECO concludes that recommendation xii has been dealt with in a satisfactory manner.

Recommendation xiii

67. *GRECO recommended that (i) all persons with top executive functions be included in the list of categories of officials who may be investigated and prosecuted by the Anti-corruption Prosecutor's Office for the commission of certain corruption and corruption-related offences, and (ii) the Anti-corruption Prosecutor's Office be provided with adequate human, financial and technical resources, as well as the necessary autonomy in order to carry out effective investigation and prosecution of offences involving persons with top executive functions and regularly inform the public of the progress of its work.*
68. The Moldovan authorities report that, following [amendments](#) to Article 270¹ of the Code of Criminal Procedure, the competence of the Anti-Corruption Prosecutor's Office (APO) has been extended to include the President of the Republic and members of the Government, including the Prime Minister, Ministers and State Secretaries. Presidential Advisers and Ministerial Advisers are not covered by the said amendments. The authorities have further informed that APO will continue to exist as a specialised prosecutor's office. A new Chief Prosecutor was appointed in June 2025 for five years. At the same time, draft amendments to the Code of Criminal Procedure are under consultations. The aim is to ensure that high-profile corruption cases, including those involving personal jurisdiction over PTEFs and senior officials, are assigned to the CNA and APO. This review aims to ease the workload of APO and CNA by prioritising high-profile cases, rather than excluding PTEFs and senior officials from their jurisdiction.
69. Regarding the second part of the recommendation, the authorities indicate that the total workforce of the APO has been set at 139 positions, comprising 132 civil servants, including those with special status, and seven technical staff. Of these 139 positions, 94 are currently occupied. Following an assessment of the APO's functional needs, in 2024 Parliament approved the increased organisational structure of APO and the Ministry of Finance has allocated a separate budgetary line, thereby strengthening the institution in line with its mandate and enhancing its operational capacity. In addition, it was decided that the main objective is to strengthen its operational capacity through the computerisation of its work processes and the provision of PC hardware and software, including workstations, printers and photocopiers. The authorities are in constant contact with international development partners to address these evolving needs.
70. Furthermore, the APO regularly publishes disaggregated statistics about high-profile cases and the outcomes of judicial proceedings on its [website](#), with the latest [2025 activity report](#) having been published in February 2026⁶. The annual report also includes direct links to relevant press releases related to high-profile cases and results, facilitating the verification of information and ensuring an increased level of transparency and

⁶ The 2023 and 2024 annual reports are found [here](#) and [here](#).

accessibility of public data. In addition, another means of communication to increase institutional transparency is contact with the media. Between January and December 2025, for example, the APO published 248 press releases and 21 video recordings, held 10 press conferences, appeared on 12 TV and radio shows, participated in three international conferences, and responded to 164 requests for access to information.

71. GRECO welcomes the amendments to the legislative framework extending the competence of the Anti-corruption Prosecutor's Office (APO) to investigate and prosecute corruption offences committed by certain categories of PTEFs, including the President of the Republic and members of the Government. However, it notes that Presidential Advisers and Ministerial Advisers are not covered by the amended provisions⁷. GRECO notes that draft amendments to national legislation are currently under consultation. It anticipates that, if adopted, they would extend APO's jurisdiction to all PTEFs and thereby fully implement the first part of the recommendation. For now, this part has been partly implemented.
72. As regards the second part, GRECO notes that an increased organisational structure for the APO has been approved and that a separate budget line has been introduced in the State budget. This will need to be reflected in a concrete increase in APO's workforce, given that, of the 139 authorised positions, only 94 are currently filled, in order to strengthen its organisational capacity. In addition, following an assessment of the APO's functional needs, efforts are underway to enhance its operational capacity, in particular through technical modernisation. GRECO further notes that the APO appears to inform the public regularly of its work through various communication tools. In these circumstances, the second part of the recommendation has also been partly implemented.
73. GRECO concludes that recommendation xiii has been partly implemented.

Preventing corruption and promoting integrity in law enforcement agencies (Police and Border Police)

74. It is recalled that the Inspectorate General of Police (the Police) and the Inspectorate General of Border Police (the Border Police), both of which are subordinated to the Ministry of Internal Affairs (MAI) and are considered law enforcement agencies (LEAs), were the subject of evaluation under the Fifth Evaluation Round.

Recommendation xiv

75. *GRECO recommended that proactive measures be taken to increase the representation of women at all levels in the Police and the Border Police, particularly at middle and senior managerial levels*

⁷ At GRECO's 102nd plenary meeting, the authorities presented factual updates, which, in their view, reflect certain progress in implementing the first part of this recommendation. These developments will be examined by GRECO in the next compliance report.

76. The Moldovan authorities report that the MAI is headed by a woman minister. Of the three Secretaries of State, two are men and one is a woman. Gender mainstreaming forms part of the governance framework and is reflected in several policy documents, including the programme to promote and ensure gender equality for 2023-2027, the Government-approved sustainable development agenda and the action plan on gender equality within the Police. Gender focal points have been designated within the MAI, and the composition of the gender steering group has been updated, with representatives from the Police and the Border Police now included as members. At the national level, training workshops, which form part of technical assistance programmes supported by international development partners, have been organised to promote women’s representation in decision making and increase their presence in managerial positions.
77. The Police has strengthened its framework to combat discrimination and harassment in the workplace through the adoption of a regulation on the functioning of hotlines. It has also trained senior police officers in a gender responsive leadership programme. A more inclusive working environment has been promoted within the Police with a view to removing barriers and improving the inclusion of women. This has been pursued through equal working conditions and pay, equal access to training, and flexible working arrangements for families where both spouses work in the Police. Maternity and paternity leave are also available. In addition, an initiative has been launched to support the work-life balance of police staff.
78. As of January 2024, women accounted for 23.39% of the workforce and men for 76.61%, while 10% of all promotions concerned women. As of 1 May 2025, the representation of women in the Police had increased to 25.41% compared to 21.92% at the time of the evaluation, and 15.7% of promotions were awarded to women. The overall representation of women in managerial positions rose to 14.22% compared to 11.6% at the time of the evaluation (from 109 to 128 women in all management positions, representing a 17.4% increase). According to the authorities, this progress is attributed to gender-sensitive policy documents, a new management approach within the Police, the empowerment of women in managerial positions, increased awareness-raising and social inclusion activities, and efforts to prevent and eradicate gender stereotypes.
79. The Border Police has established a consultative working group on ensuring gender equality, as well as other units specialised in gender equality at the level of regional directorates. As of 1 January 2024, women accounted for 28% of the workforce (compared to 26% at the time of the evaluation) and men for 72%, while women held 16.66% of managerial positions and men 83.34%. As of 1 May 2025, women represented 30.23% of the workforce and men 69.77%, with women occupying 21.14% of managerial positions and men 78.86%, compared to 15.78% of women holding managerial positions at the time of the evaluation.
80. The following table summarises an evolution of the representation of women in the Police and the Border Police over time.

Institution	Indicator	At the time of evaluation	January 2024	May 2025
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Police	Share of women in total workforce	21.92%	23.39%	25.41%
	Share of men in total workforce	78.08%	76.61%	74.59%
	Share of women in managerial positions	11.6%	-	14.22%
	Number of women managers	109	-	128
	Share of promotions awarded to women	9%	10%	15.7%
Border Police	Share of women in total workforce	26%	28%	30.23%
	Share of men in total workforce	74%	72%	69.77%
	Share of women in managerial positions	15.78%	16.66%	21.14%
	Number of women managers	51	-	78

81. GRECO takes note of the variety of measures introduced in the Police and the Border Police to increase the representation of women. They have translated into a higher and measurable presence of women both in the overall workforce and in managerial positions. It encourages the authorities to maintain the momentum, in particular by further enabling women to access very senior managerial positions and close the gender gap at the top level, where no such positions are currently occupied by women. In view of the proactive measures taken and the demonstrable upward trend in the representation of women, GRECO considers that this recommendation has been dealt with in a satisfactory manner.
82. GRECO concludes that recommendation xiv has been dealt with in a satisfactory manner.

Recommendation xv

83. *GRECO recommended that (i) legislation be developed to regulate the receipt of donations by the Police and the Border Police, and (ii) donations be published on a dedicated, accessible webpage, clearly indicating the nature and value of each donation, the donor's identity and how the assets donated were used.*
84. The Moldovan authorities report that, regarding the first part of the recommendation, in 2024 the Border Police adopted an internal order governing, amongst others, the receipt of donations from international development partners or donors. The order provides for the establishment of a commission responsible for the receipt and registration of donations, and modalities for the use, maintenance and storage of donations. In addition, the MAI ordered the conduct of an audit to assess the accounting process for humanitarian aid. As a result of the audit's findings, in 2025 the MAI issued an order on the procedure for accepting, storing, distributing and recording

humanitarian aid (Order no. 525 of 26 September 2025) and another order on accepting or rejecting donations (Order no. 660 of 27 November 2025). These orders provide for the establishment of a commission for the acceptance of humanitarian aid and sets out the modalities for receiving aid and donations. In response, the Police adopted Order no. 55/2026 on the acceptance of humanitarian aid and donations, which requires the Directorate for Prevention of Corruption of the Police to issue an opinion on the risks and legality of accepting donations.

85. Concerning the second part of the recommendation, the [Border Police Donations Register](#) contains information on the nature, value and destination of the donated goods, as well as the identity of the donor. The [Police Donations Register](#) is also published online.
86. GRECO notes that, regarding the first part of the recommendation, both the Police and the Border Police have adopted binding internal orders governing the receipt, registration, storage and use of donations. They align with the requirements introduced by two orders adopted by the MAI. While these instruments provide for dedicated bodies and safeguards concerning the acceptance and management of donations, their effective application in practice will need to be ensured. In these circumstances, this part of the recommendation has been implemented. Concerning the second part of the recommendation, GRECO notes that both the Police and the Border Police publish their respective donations registers online. They include information on the nature and value of donations, the identity of donors and their intended use. GRECO therefore considers that this part of the recommendation has been implemented.
87. GRECO concludes that recommendation xv has been implemented satisfactorily.

Recommendation xvi

88. *GRECO recommended that the Police and the Border Police take measures to comply with the requirements laid down in the new freedom of information legislation (as regards, for example, the increase of proactive transparency, the creation of a register of requests for public interest information, the handling of requests for public interest information within the statutory time-limit, and the proportionate application of the legitimate grounds for limitations of access to public interest information).*
89. The Moldovan authorities report that, following the entry into force of Law no. 148/2023 on access to public interest information, the MAI adjusted its website to include a dedicated section on requests for access to information, setting out the applicable legal framework, submission procedures, mandatory elements of requests and applicable fees. All requests are recorded in a register within the Electronic Document Management System (e-Cancelaria), which is accessible to MAI staff. Efforts are ongoing to make this register publicly available.
90. The Police and Border Police websites have also been updated with information of public interest, found under the 'News' and 'Public Information' sections. Information is disclosed within ten days and recorded via the e-Cancelaria, which automatically indicates replies' deadlines. As regards the Police, a total of 11 522 access requests were

received in 2024, and a further 227 requests recorded for the first five months of 2025. Requests were submitted through electronic applications, the internal electronic management system, post and in-person submissions. Even though the Police did not refuse any of these requests, two appeals were nevertheless filed with the administrative courts: one concerning the cancellation of the refusal to disclose information and the other relating to the disclosure of voluminous information.

91. Regarding the Border Police, the Strategic Communication Section is responsible for publishing information of public interest. Structural and regional subdivisions are required to transmit relevant information for publication within five working days after it becomes available. The Document Management Section is responsible for registering and processing information requests. According to the register of requests, in 2024, 78 requests were registered, of which 5 were refused. Three appeals were filed with the administrative courts: one was discontinued following the withdrawal of the appeal; another was dismissed by the court, and the third appeal was upheld, with the court ordering the re-examination of the request for access to information. In the first five months of 2025, a further 16 requests were recorded, none of which was rejected on the ground of personal data protection or challenged before the administrative courts.
92. GRECO notes the steps taken by the Police and the Border Police to comply with the access-to-information legislation. They include the establishment of registers of requests which are intended to become publicly accessible, the designation of responsible units, the development of website sections dedicated to public interest information, the introduction of internal deadlines and automated tracking of responses, and efforts to publish information proactively. It further notes the high volume of requests processed, the very low number of refusals, and the availability of judicial review, including a few court appeals adjudicated in 2024. Taken together, these elements indicate that the authorities have taken concrete measures to ensure compliance with the requirements of this recommendation. GRECO encourages the authorities to continue strengthening transparency, disclosure of information and the handling of requests in a timely and proportionate manner.
93. GRECO concludes that recommendation xvi has been dealt with in a satisfactory manner.

Recommendation xvii

94. *GRECO recommended that dedicated regular trainings on risk management be provided to police officers in the Police and the Border Police, who are involved in the preparation and finalisation of risk registers, including the inventory of sensitive functions.*
95. The Moldovan authorities report that the MAI, including the Police and the Border Police, applies a risk-management framework and related internal control standards. Risk registers are prepared annually at subdivision level and consolidated centrally. The Police and the Border Police each approve annual consolidated risk registers, including corruption risks. Both LEAs maintain inventories of sensitive functions, prepared annually, and corresponding management plans. Sensitive functions are identified on the basis of criteria such as the management of sensitive information; the administration

and development of software programmes and applications; the management of financial means; the management of goods and services; contracting and involvement in the process of awarding and implementing public procurement contracts; involvement in the evaluation, selection and contracting of projects financed from public or external funds, and the management of external assistance through monitoring, reporting and evaluation of external assistance projects/programmes. The Directorate for Prevention of Corruption of the Police, the Internal Security Directorate of the Border Police and the Internal Protection and Anti-corruption Service (SPIA) of the MAI are responsible for preparing the consolidated annual risk registers.

96. The authorities indicate that risk management training is a priority within the MAI and its subordinated authorities, including the Police and the Border Police. In the Police, five training sessions on risk assessment and management were delivered in 2024 for 40 police officers, of whom nine were women (four in managerial positions) and 31 men (10 in managerial positions).
97. In addition, the MAI provided annual in-service training through the SPIA for its subordinated authorities, including the Police and the Border Police. In 2024, SPIA trainers delivered 215 sessions, for a total of 3 837 participants. In the first three months of 2025 a further 98 sessions were delivered for 4 027 participants. These sessions focused, amongst others, on identification and management of sensitive functions, crisis analysis and management, institutional integrity assessment mechanisms and corruption risk management. Additional training activities on corruption risk management and integrity-related issues were reportedly delivered by the CNA for SPIA staff and Police officers, targeting a total of 150 participants. Two training sessions were specifically organised in May 2025 for the MAI's senior management, including the Minister, the State Secretaries, the Secretary General, the Deputy Secretary General, and heads of central departments and administrative authorities subordinated to the MAI.
98. At the operational level, the Operational Management module, which is run by the MAI, prioritises in-service training for law enforcement officers (LEOs) in topics related to risk analysis, risk management strategies, risk assessment, planning, organisation and decision-making. In this context, in June 2024, external partners supported the training of 15 staff members (including managers) of the Police and the Border Police (including from SPIA) in risk management, with a focus on the documentation of basic processes within the subdivisions of the central apparatus of the MAI and SPIA. In August 2024, another 15 Police and Border Police officers underwent training in the management of internal control within the administrative authorities and institutions subordinated to the MAI. All 30 staff members, who act as coordinators of the internal managerial control system and are directly involved in risk identification and monitoring processes, were trained on definitions and concepts of performance and risk management; the performance management process, including plans, objectives, actions and performance indicators; risk management tools and methods; the risk management process, including identification, evaluation, response, monitoring and reporting; and the prevention of corruption risks for individuals in executive management positions.

99. In 2026, the authorities plan to continue with two training sessions on the identification and management of sensitive functions within the Police and the Border Police, four training sessions on the disclosure of breaches of the law identified in a professional context, and two training sessions on risk management for Police staff members as well as other dedicated capacity-building activities on internal managerial control and integrity and risk management.
100. GRECO notes that the Police, the Border Police and the MAI have established and operationalised annual risk management processes, including the preparation of consolidated risk registers and inventories of sensitive functions. It further notes that a significant number of training sessions have been delivered in 2024 and 2025 on integrity, corruption risk assessment and management. These sessions targeted staff members of the Police, the Border Police and the MAI, including those in managerial positions, as part of broader integrity, internal control and corruption-prevention training activities. GRECO also welcomes that dedicated training and capacity-building activities on integrity and risk management have been planned for 2026. Taken together, these elements demonstrate that regular and targeted training on risk management is being provided to the relevant staff. GRECO nevertheless calls on the authorities to ensure that such training continues to be delivered on a recurring basis and that it consistently targets the staff members responsible for compiling risk registers and identifying sensitive functions. In these circumstances, GRECO considers that this recommendation has been dealt with in a satisfactory manner.
101. GRECO concludes that recommendation xvii has been dealt with in a satisfactory manner.

Recommendation xviii

102. *GRECO recommended that (i) dedicated (separate or joint) code(s) of ethics be developed and published in respect of the Police and the Border Police, covering all relevant integrity matters (such as conflicts of interest, gifts, contacts with third parties, outside activities, handling of confidential information etc.), and (ii) the code(s) of ethics be complemented by tailor-made practical guidance in respect of each of the Police and the Border Police and an enforcement mechanism.*
103. The Moldovan authorities report that, regarding the first part of the recommendation, a single code of ethics and deontology for civil servants with special status within the MAI exists and applies to the Police and the Border Police. As regards the second part of the recommendation, the SPIA has developed and disseminated “Pocketbooks” on integrity and corruption prevention for the [Police](#) and the [MAI](#), which offer practical guidance on promoting integrity and preventing corruption. They contain key information on identifying and reporting corrupt behaviour, employees’ responsibilities for maintaining institutional integrity, and ways for reporting breaches of the law. They also explain the protection offered to whistleblowers. This guidance is used in training sessions organised by the SPIA. Furthermore, the SPIA, with the support of a Council of Europe technical assistance project, has produced a [guide](#) on integrity rules applicable

to civil servants with special status within the MAI, which focuses on two aspects: integrity and professional ethics and deontology.

104. GRECO considers that, with regard to the first part of the recommendation, the situation has remained the same as described in paragraph 125 of the Evaluation Report. A single code of ethics for civil servants with special status within the MAI remains in place, while the recommendation calls for a dedicated (separate or joint) code of ethics for the Police and the Border Police tailored to their operational realities, integrity risks and professional specificities. This part of the recommendation has therefore not been implemented.
105. The second part of the recommendation relating to the production of practical guidance and the establishment of an enforcement mechanism hinges on the development of a dedicated code of ethics for the Police and the Border Police, as required under the first part. However, GRECO considers that, in view of the authorities' efforts to produce and disseminate pocketbooks and a guide on the current code of ethics, this part of the recommendation has been partly implemented.
106. GRECO concludes that recommendation xviii has been partly implemented.

Recommendation xix

107. *GRECO recommended that (i) regular in-service training of Police and Border Police officers, including managers, on integrity matters ethics and anti-corruption be conducted, and (ii) a mechanism be established for providing confidential counselling on ethical and integrity matters to Police and Border Police officers.*
108. The Moldovan authorities report that, regarding the first part of the recommendation, in-service training plans are drawn up annually on various topics, including ethics and diversity in professional communication, ethics in professional communication, professional ethics and deontology. Extensive integrity training is delivered through MAI institutions, such as the Police Academy and the SPIA, as well as the CNA and international development partners. The Police Academy has revised its curricula to strengthen its practicality and relevance and to reflect the specificities of LEAs activities, drawing on case studies and real-life examples. Two specialised courses on "Integrity and Prevention of Corruption" were delivered to 46 LEOs.
109. In 2024, the SPIA trainers delivered 215 training sessions to 3 837 participants from MAI-subordinated institutions. During the first five months of 2025, a further 71 sessions were delivered to 1 510 participants. The sessions covered all relevant integrity issues, including the identification, prevention and management of conflicts of interest, receipt of gifts and other benefits, contacts with third parties and associated integrity risks, the external activities of civil servants and their compatibility with employment status, confidentiality and data protection, compliance with professional ethics and standards of conduct, and the monitoring of employees' lifestyles in relation to corruption risks.

110. In 2024, the Police organised 42 training, information and awareness-raising activities involving 1 866 officers. In 2025, 74 such activities were organised, with the participation of 3 676 police officers. The Border Police approved a dedicated “integrity and anti-corruption” training plan for 2024 and 2025 and conducted a remote pilot course entitled “Integrity and Anti-Corruption. Ethics and Professional Ethics”, where 1 367 officers participated. It also carried out five integrity-related activities for 101 managers in 2024 and nine activities for 346 officers in 2025.
111. Between October 2025 and January 2026, the CNA, in cooperation with the MAI, launched the information campaign “Integrity for a Safe Society,” an initiative aimed at promoting the principles of integrity, professional ethics, and transparency within institutions subordinated to the MAI⁸. A total of 16 training sessions were conducted for 993 police employees, holding both operational and managerial positions.
112. Regarding the second part of the recommendation, the Police has entrusted the Directorate for the Prevention of Corruption with the task of providing confidential advice to staff members in cases of ethical dilemmas. The Border Police has entrusted the Human Resources Management Directorate and Regional Directorates with the task of providing confidential advice. Job descriptions of relevant staff members were revised to include responsibility for providing such advice. Two integrity and anti-corruption training sessions to support this mechanism were organised for 36 managers. However, no requests for confidential advice have yet been reported.
113. GRECO considers that, having regard to the approved annual training plans and the extensive and sustained efforts made by the authorities to deliver regular integrity-related sessions targeting both officers and managers of the Police and the Border Police, the first part of the recommendation has been implemented. As regards the second part, GRECO takes note that concrete mechanisms have been formally established to provide confidential advice within the Police and the Border Police. It expects that the existence of such mechanisms, combined with increased awareness-raising activities amongst staff members, will result in greater visibility and use of confidential counselling in the future.
114. GRECO concludes that recommendation xix has been implemented satisfactorily.

Recommendation xx

115. *GRECO recommended that integrity checks of law enforcement officers, including sensitive functions and managers, in the Police and the Border Police take place systematically prior to recruitment and throughout their career.*
116. The Moldovan authorities report that integrity checks of LEOs, including those in sensitive functions and managerial positions (at A01, A02 and A03 level), are carried out systematically at various stages of the career cycle, including recruitment/appointment, promotion, transfer, ad interim promotion, secondment, assignment and reclassification. The MAI applies these mechanisms through human resources units,

⁸ The training plan for 2026 is available [here](#).

internal inspection, the SPIA and the Information and Security Service in order to access state secrets, and its subordinated institutions, such as the Police and the Border Police, are required to do the same for their staff members.

117. Prior to recruitment or promotion, candidates undergo a range of verifications, including compliance with eligibility requirements, verification of professional integrity through the mandatory submission of an integrity record certificate, a “special check” to examine restrictions, prohibitions and incompatibilities, verification of professional and managerial experience, and criminal and contravention checks. The SPIA verifies that the conditions for promotion and the granting of special grades have been met. It applies ‘integrity filters’, involving appropriate checks on candidates who are involved in criminal or contravention cases, in situations of conflicts of interest or other circumstances that could pose a risk to the integrity or security of the MAI system.
118. Continuous integrity monitoring throughout the career includes annual performance evaluation, periodic medical and psychological assessment, professional integrity checks and tests, lifestyle monitoring, examination of reports of non-compliant conduct and any resulting disciplinary investigations. The results of simulated integrity tests are submitted to the employer and may lead to disciplinary sanctions. Between 1 January 2024 and 30 March 2025, the SPIA applied integrity filters in respect of 9 210 employees, including the staff of the Police and the Border Police, issuing 231 unfavourable opinions regarding candidates seeking promotion or award of special grades.
119. The authorities further indicate that annual inspection and audit plans are approved at the level of the MAI, the Police and the Border Police, providing for regular inspections and audit missions independent of recruitment, promotion or career events. These plans cover areas of institutional activity, including sensitive functions and managerial staff, and aim to assess compliance with the regulatory framework, internal procedures and managerial integrity standards. In addition, internal audit directorates conduct regular audits on the basis of annual plans, including in areas such as public procurement, financial management, public asset management and operational compliance, including the use of body cameras.
120. GRECO notes that integrity checks, including eligibility and experience requirements, medical and psychological tests, criminal and contravention record checks, professional integrity certificates, special background checks, lifestyle monitoring and vetting for access to state secrets, are carried out for LEOs by various bodies at key stages of the career cycle. The authorities have also provided figures demonstrating that integrity filters are commonly used in practice. It further notes that annual inspection and audit plans at ministerial and institutional level provide for regular integrity-related controls, including in relation to sensitive functions and managerial staff, independently of career-related events. GRECO considers that the combination of these measures adequately addresses the underlying concerns that led to this recommendation. It expects that they will continue to be applied systematically and effectively in practice.
121. GRECO concludes that recommendation xx has been dealt with in a satisfactory manner.

Recommendation xxi

122. GRECO recommended (i) establishing a merit-based, competitive and transparent process for the selection and appointment of deputies to the Chief of the Police, and (ii) limiting the practice of ad interim promotions in the Police and the Border Police to only exceptional situations and further enhancing the transparency and objectivity of all decisions regarding career promotion of law enforcement officers.
123. The Moldovan authorities report that, regarding the first part of the recommendation, the Chief of Police is appointed by the Government on the proposal of the Minister of Internal Affairs. The Deputy Chiefs of the Police, however, are appointed without competition, in compliance with the legal provisions, which do not require a public competition for these positions. The three current deputies were appointed, taking into account their professional experience in the Police, experience in the field of management in the Police and professional integrity and reputation. They exercise their functions on a permanent (not interim) basis. The appointment of deputies to the Chief of the Police was justified by legal circumstances, specific crisis management needs related to regional security, instability and gas and energy supply challenges, and the requirement to ensure operational continuity.
124. As regards the second part of the recommendation, the authorities report a reduction in the use of ad interim management appointments in the Police and the Border Police. In the Police, the number of ad interim management positions fell from 173 in 2023 to 137 in 2025, representing 13.8% of management positions compared to 19% previously. In the Border Police, they decreased from 84 in 2023 to 45 in 2025, accounting for 12.19% of management positions compared to 21.5% previously. The table below illustrates the reduction in the number and proportion of ad interim managerial appointments in the Police and the Border Police.

LEA	Year	Total managerial positions	Ad interim managerial positions	Percentage of all managerial positions
Police	2023	907	173	19%
	2025	993	137	13.8%
Border Police	2023	390	84	21.5%
	2025	369	45	12.19%

125. The lack of managerial training for admission to management positions had contributed to the widespread use of ad interim appointments. To respond to this obstacle, the number of managerial courses was increased to 12 (eight in 2024 and four in 2025). Completion of a management course at the appropriate level is now required for promotion or participation in competition for management posts. In cases where no eligible candidates are available, interim appointments are used as a temporary measure to maintain institutional functionality.
126. GRECO notes that, with regard to the first part of the recommendation, the legal framework still does not provide for a competitive, merit-based and transparent procedure for the appointment of Deputy Chief of the Police, unlike the situation in the Border Police. The situation therefore remains unchanged from that described in

paragraph 143 of the Evaluation Report, and this part of the recommendation has not been implemented.

127. As regards the second part, GRECO welcomes the reported reduction in the number and proportion of ad interim managerial appointments in both the Police and the Border Police. It also welcomes the expansion of managerial training courses as a positive step towards enabling competitive managerial promotions. However, interim appointments continue to represent a significant share of all managerial posts. In these circumstances, GRECO considers that more demonstrable progress is needed to limit this appointment practice to only exceptional circumstances. This part of the recommendation has therefore been partly implemented.

128. GRECO concludes that recommendation xxi has been partly implemented.

Recommendation xxii

129. *GRECO recommended that the level of remuneration in the Police and the Border Police be increased to establish attractive wages for the lower ranks (entry level), while maintaining a stimulating margin for progression throughout the career.*

130. The Moldovan authorities report that the remuneration of public sector employees, including employees of the Police and Border Police, is regulated by Law No. 270/2018 on the public sector pay system, which aims to ensure a transparent, fair, attractive, simple-to-manage system for the remuneration of staff in the budgetary sector, with the basic salary as the main component.

131. For newly employed non-commissioned officers in both LEAs, the average salary increased from EUR 375.99 in 2023 to EUR 446.78 in 2025, representing an overall increase of 18.83%. For newly employed superior non-commissioned officers, the average salary rose from EUR 462.01 in 2023 to EUR 553.07 in 2025, marking an overall increase of 19.71%. For senior commissioned officers, the average salary increases from 2023 to 2025 ranged from 25.33% to 25.68%.

132. One-time bonuses were paid in 2024 and 2025 in addition to the basic salary, ranging from EUR 28 to EUR 374 per employee. At the beginning of 2025, an annual award for 2024 was also paid, amounting to 50% of the employee's basic salary, calculated *pro rata* to the time actually worked.

133. In 2026, the average salary of a newly hired senior non-commissioned officer remains the same as in 2025 and represents 62.2% of the national average salary. At the same time, from 1 January 2026, salaries of investigation and criminal prosecution officers increased by 10% compared to 2025, and personnel entitled to specific allowances in the national defence, state security and public order sectors benefitted from increases of 20% of the annual basic salary. In addition, officers carrying out special investigative and criminal prosecution activities in the CNA and the MAI received an increase of 30% of the basic salary.

134. GRECO notes the reported increases in salaries for staff members of the Police and the Border Police, combined with the existence of bonus schemes and annual awards which complement basic salaries and are intended to reward performance and encourage retention. Taken together, these elements demonstrate concrete measures to improve the attractiveness of entry-level salaries and remuneration in specialised functions. However, as stated by the authorities, entry-level salaries remain below the national average salary, and no information has been provided to demonstrate that current remuneration levels are sufficiently competitive to ensure attractiveness and retention of staff in the Police and the Border Police.

135. GRECO concludes that recommendation xxii has been partly implemented.

Recommendation xxiii

136. *GRECO recommended that a study be undertaken on the existing practice of law enforcement officers engaging in outside activities (paid or unpaid) and that, in the light of its findings, the regulatory framework be adequately developed/adapted in order to limit integrity-related risks and effectively supervise the exercise of outside activities.*

137. The Moldovan authorities report that Article 53 of Law no. 288/2016 on civil servants with special status within the MAI lays down incompatibilities in the activity of civil servants with special status, with the exception of scientific, teaching and creative activities, participation in development projects in the competence of the employer and representation of the State in economic societies. In case of a situation of incompatibility, civil servants with special status are required to cease the incompatible activity within 30 calendar days or to resign.

138. The authorities indicate that a proposal to amend Article 53 of Law no. 288/2016 on the civil servants with special status within the MAI is under consideration. It would introduce a derogation for civil servants with a special status to engage in other remunerated activities outside working time, on the basis of an individual employment contract or other civil contract, in commercial companies, cooperatives, state or municipal enterprises, as well as in non-commercial organisations in the private or public sector, provided that such entities are not controlled by, subordinated to or otherwise within the competence of the authority in which the civil servant with special status is employed.

139. GRECO notes that a draft amendment to introduce a derogation for civil servants with special status within the MAI, including law enforcement officers, to engage in other remunerated activities outside working time is under consideration. However, GRECO observes that no study has been undertaken to assess the scale, nature and integrity risks of outside activities performed by LEOs, as required by the recommendation. Furthermore, the proposed draft legislation does not define criteria for permissible outside activities, establish clear authorisation procedures, or provide for effective disclosure, registration and oversight mechanisms, as described in paragraph 157 of the Evaluation Report. In these circumstances, while a limited step has been taken through

the preparation of draft legislation, the underlying core concerns remain unaddressed. GRECO therefore considers this recommendation to be partly implemented.

140. GRECO concludes that recommendation xxiii has been partly implemented.

Recommendation xxiv

141. *GRECO recommended that (i) an effective supervision mechanism be established to implement the rules on post-employment restrictions in respect of law enforcement officers and (ii) the supervision mechanism be given the powers to impose adequate sanctions in case of breaches of the rules on post-employment restrictions.*

142. The Moldovan authorities refer to Law no. 82/2017 on integrity which provides for compliance with the regime of restrictions and limitations in relation to the termination of office, employment or service relationships and the migration of public agents to the private sector. For the purposes of that law, LEOs fall within the category of public servants. The authorities further report that, regarding the first part of the recommendation, the Border Police now requires external candidates to sign a written statement confirming that they have been informed of the applicable post-employment prohibitions, such as employment, for one year, in organisations over which they exercised supervisory or control duties during the last year in office; conclusion of commercial contracts, for one year, with the public entity in which they worked during their last year in office; or representing natural or legal persons before their former employer for one year following termination of service. The statements are stored in the personal files of border guards by the Human Resources Department.

143. As regards the second part of the recommendation, the authorities indicate that Article 313⁶ of the Contravention Code provides for liability of both former civil servant and employers for breaches of post-employment restrictions. Initiation of contravention proceedings falls within the competence of the ANI. Restrictions apply even when representation activities are not remunerated. Circulars on the climate of institutional integrity have been disseminated within the Police, including information on compliance with post-employment restrictions.

144. GRECO notes that, despite a general legal framework on post-employment restrictions and the declaratory measures taken by the Border Police, there is no evidence that a dedicated and effective supervision mechanism to monitor compliance with those restrictions for LEOs has been established. In these circumstances, the first part of the recommendation has not been implemented. As regards the second part of the recommendation, GRECO notes that, while a body is formally competent to initiate contravention proceedings for breaches of post-employment restriction, the absence of an effective supervision mechanism, systematic controls or statistical evidence of enforcement in practice lead it to conclude that the sanctioning powers are neither operational nor effective. This part of the recommendation has therefore not been implemented.

145. GRECO concludes that recommendation xxiv has not been implemented.

Recommendation xxv

146. *GRECO recommended that (i) the Police and the Border Police take measures for the practical implementation of the obligations stemming from the whistleblowers' protection legislation, and (ii) law enforcement officers, in particular managers, be trained and informed on a regular basis about the whistleblowing procedures and protection measures.*
147. The Moldovan authorities report that, regarding the first part of the recommendation, the Police adopted internal procedures and designated the Directorate for the Prevention of Corruption as the unit responsible for handling whistleblower reports and for keeping a register of disclosures. The internal reporting channel can also be reached by email through avertizor@igp.gov.md, and a dedicated section has been set on the Police [website](#). However, no reports have been registered to date.
148. The Border Police approved similar procedures and designated the Internal Security Directorate as the responsible authority. Information on the existence and use of internal reporting channels was disseminated to Border Police employees via institutional internal and public information [channels](#). To this end, the heads of Border Police structural and regional subdivisions organised internal information meetings to ensure that all subordinate staff were made aware of the provisions of the relevant order, as evidenced in meeting minutes. In 2025, two reports were registered with the Border Police's Internal Security Directorate.
149. In parallel, the SPIA operates the anti-corruption hotline "1520" and a dedicated [line](#) for reporting non-corruption violations. The Ombudsperson has reported practical and legal challenges in applying protection measures in cases of external or public disclosures, including gaps in the legal framework, uncertainties surrounding the whistleblower status, the lack of interim protective measures, uneven institutional practice of the law and organisational cultures that discourage reporting.
150. Regarding the second part of the recommendation, the SPIA prepared a study in 2024 on the impact and implementation of the whistleblowing mechanism and on employees' perceptions, which was disseminated to all MAI-subordinated entities. Training activities were organised in 2024, including for managers at different levels. Integrity training also included the module on whistleblower protection, which benefited 61 police officers (10 women and 51 men), 42 of whom were managers. A survey conducted between October and December 2024 by the Police's Directorate for Prevention of Corruption identified the need for training and awareness-raising activities.
151. In 2025, the following training and awareness-raising activities were organised: 33 training sessions on the reporting of corruption and whistleblower protection, attended by 583 LEOs; 10 targeted sessions on integrity reporting and whistleblower protection, attended by 178 LEOs; 17 training sessions for 253 officers from the National Inspectorate of the Public Security of the Police; three community policing sessions

attended by 60 LEOs, which also addressed whistleblower protection; three integrity training sessions attended by 92 LEOs, which also covered whistleblower protection; 13 training sessions organised within the Police subdivisions as part of the “Integrity for a safer society”, benefiting 794 LEOs; this campaign will continue in 2026; and 52 additional integrity-related training activities, reaching a further 3 531 LEOs in the Police and also addressing whistleblower protection.

152. GRECO notes that, regarding the first part of the recommendation, the Police and the Border Police have approved internal procedures for receiving and examining disclosures. They have also designated responsible units for handling whistleblower reports, and for keeping registers of disclosures. It further notes that information on the existence of internal channels has been disseminated to law enforcement officers and is made publicly available. That said, GRECO considers that important practical and legal challenges remain, as noted by the Ombudsperson and reflected in the very limited number of reports registered (currently only two). The information provided does not yet demonstrate full compliance with the obligations stemming from the Law on Whistleblowers, in particular as regards confidentiality, effective protection from retaliation and access to effective remedies. This part of the recommendation has therefore been partly implemented.
153. Regarding the second part, GRECO takes note of the significant training and awareness-raising activities carried out for LEOs, including managers. This was particularly evident in 2025, when such activities increased in frequency, with some sessions on whistleblower protection integrated into broader integrity training activities. These efforts demonstrate increased attention to whistleblower protection, which needs to be institutionalised and delivered on a regular and systematic basis over time. The very limited number of reports submitted through internal channels underlines the need for continued awareness-raising activities to ensure that reporting mechanisms are effectively used in practice. GRECO therefore encourages the authorities to maintain the momentum in 2026 and beyond, in particular by ensuring continued training for managers. This part of the recommendation has therefore been partly implemented.
154. GRECO concludes that recommendation xxv has been partly implemented.

III. CONCLUSIONS

155. In the light of the foregoing, GRECO concludes that the Republic of Moldova has implemented satisfactorily or dealt with in a satisfactory manner seven of the 25 recommendations set out in the Fifth Round Evaluation Report. Of the outstanding 18 recommendations, 12 recommendations have been partly implemented and six have not been implemented.
156. More specifically, recommendations xii, xiv, xv, xvi, xvii, xix and xx have been implemented satisfactorily or dealt with in a satisfactory manner, recommendations i, iii, v, vi, viii, xi, xiii, xviii, xxi-xxiii and xxv have been partly implemented and recommendations ii, iv, vii, ix, x and xxiv have not been implemented.

157. GRECO notes that, with regard to top executive functions, tangible progress has been achieved in several areas. These include the introduction of legal criteria for the appointment of Secretaries of State, the development of internal oversight mechanisms within the National Integrity Authority, the publication of statistics on in-depth controls of asset declarations, the strengthening of transparency and access to public interest information, and the expansion of the jurisdiction of the Anti-Corruption Prosecutor's Office to cover certain PTEFs. At the same time, important gaps remain in relation to other areas. Amongst them are corruption-risk management and the effective targeting and control of asset declaration of PTEFs, integrity checks for PTEFs, the regulation of conflicts of interest and post-employment restrictions as well as rules on contacts with lobbyists. GRECO further notes that several important reforms remain at the preparatory or planning stage. These concern the finalisation of a code of conduct for PTEFs, the adoption of a revised law on public participation in decision-making, the modernisation of the public consultation portal, the development of an e-legislation platform, the introduction of risk-based automatic verification within the e-Integrity system, and the establishment of a supervisory mechanism for post-employment restrictions. GRECO therefore urges the authorities to proceed with the adoption of outstanding legislative and regulatory measures and to ensure that existing mechanisms are adequately resourced.
158. GRECO notes that, with regard to the law enforcement agencies, tangible progress has been achieved in several areas. These include the introduction of proactive measures to increase the representation of women at all levels, the enhancement of transparency and access to information of public interest, the delivery of extensive and regular integrity-related training, the creation of confidential counselling mechanisms on ethics and integrity matters, the publication of donation registers, the strengthening of the risk management system and the systematic conduct of integrity checks for LEOs at key stages of the career cycle. Progress has also been made in other areas. These relate to the establishment of internal reporting channels for whistleblowers and the delivery of extensive training and awareness-raising activities for LEOs, including managers. At the same time, gaps remain. Amongst them are the absence of a dedicated code of ethics for the Police and the Border Police, the lack of an effective supervision mechanism for post-employment restrictions, shortcomings in the regulation and oversight of outside activities, the continued reliance on ad interim managerial appointment and the absence of a competitive, merit-based and transparent selection process for Deputy Chief of the Police. GRECO therefore encourages the authorities to build on the progress achieved to date by moving forward with the implementation of the outstanding recommendations and by consolidating recent reforms through clear rules, transparent procedures and effective oversight in practice.
159. 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 Republic of Moldova to submit additional information with regard to the implementation of outstanding

recommendations, namely recommendations i-xi, xiii, xviii, and xxi-xxv, by 30 September 2027.

160. GRECO invites the authorities of the Republic of Moldova to authorise, as soon as possible, the publication of this report, to translate it into the national language and to make the translation public.