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FOURTH EVALUATION ROUND

Corruption prevention in respect of members of
parliament, judges and prosecutors

FOURTH *INTERIM* COMPLIANCE REPORT BOSNIA AND HERZEGOVINA

Adopted by GRECO at its 103rd Plenary Meeting
(Strasbourg, 8-12 June 2026)

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I. INTRODUCTION

1. The Fourth *Interim* Compliance Report assesses the measures taken by the authorities of Bosnia and Herzegovina to implement the recommendations issued in the Fourth Round Evaluation Report on Bosnia and Herzegovina (see paragraph 2) on “corruption prevention in respect of members of parliament, judges and prosecutors”.
2. GRECO adopted the [Fourth Round Evaluation Report on Bosnia and Herzegovina](#) at its 70th plenary meeting (on 4 December 2015) and it was made public on 22 February 2016, following authorisation by Bosnia and Herzegovina. The corresponding [Compliance Report](#) was adopted by GRECO at its 79th Plenary Meeting (on 23 March 2018) and made public on 22 May 2018, following authorisation by Bosnia and Herzegovina.
3. The [Second Compliance Report](#), adopted by GRECO at its 85th plenary meeting (on 25 September 2020) and published on 16 December 2020, following the authorisation of Bosnia and Herzegovina, concluded that in view of the lack of tangible progress in implementing GRECO’s recommendations, the very low level of compliance with the recommendations was “globally unsatisfactory” in the meaning of Rule 31 revised, paragraph 8.3 of the Rules of Procedure.
4. In the [Interim Compliance Report](#), adopted by GRECO at its 89th plenary meeting (on 3 December 2021) and made public on 1 September 2022, following authorisation by Bosnia and Herzegovina, GRECO concluded that the very low level of compliance with the recommendations remained “globally unsatisfactory.”
5. In the [Second Interim Compliance Report](#), adopted by GRECO at its 93rd plenary meeting (on 24 March 2023) and made public on 8 June 2023, following authorisation by Bosnia and Herzegovina, GRECO concluded that the very low level of compliance with the recommendations remained “globally unsatisfactory.”
6. In the [Third Interim Compliance Report](#) adopted by GRECO at its 98th plenary meeting (on 22 November 2024) and made public on 26 February 2025, following authorisation by Bosnia and Herzegovina, GRECO concluded again that the very low level of compliance with the recommendations remained “globally unsatisfactory” and asked the Head of the delegation of Bosnia and Herzegovina to provide a report on the measures taken to implement the outstanding recommendations by 30 November 2025 at the latest. That report was received on 28 November 2025 and served as a basis for the current Fourth *Interim* Compliance Report.
7. GRECO selected Spain (with respect to members of parliament) and North Macedonia (with respect to judges and prosecutors) to appoint rapporteurs for the compliance procedure. The Rapporteurs appointed were Ms Ana Maria ANDRÉS BALLESTEROS, on behalf of Spain and Mr Vladimir GEORGIEV on behalf of North Macedonia. They were assisted by GRECO’s Secretariat in drawing up this Fourth *Interim* Compliance Report.

II. ANALYSIS

8. GRECO, in its Fourth Round Evaluation Report, addressed 15 recommendations to Bosnia and Herzegovina. In the Third *Interim* Compliance Report, GRECO concluded that recommendations x, xi and xv had been implemented satisfactorily or dealt with in a satisfactory manner, recommendations i, ii, iv, v, vi, vii, viii, ix, xii, xiii and xiv had been partly implemented and recommendation iii had not been implemented. Compliance with the 12 outstanding recommendations is dealt with below.

9. At the outset, the authorities of Bosnia and Herzegovina report that the Agency for Prevention of Corruption and Coordination of Combating Corruption (APIK) coordinates implementation and monitoring of the 2024–2028 Anti-Corruption Strategy and Action Plan, which introduce integrity and anti-corruption measures for parliamentarians, judges and prosecutors, including institutional anti-corruption plans, conflict-of-interest management, asset reporting, ethics standards, disciplinary mechanisms and transparency in appointments and promotions. APIK oversees reporting and provides recommendations, with broad participation of institutions and civil society (38 civil society organisations participated in the process of developing the Strategy and its Action Plan). The Strategy is published online. Ongoing activities include inter-institutional cooperation on asset control, operational software for asset declarations, public disclosure of declarations, strengthened financial management and internal controls, and continuous specialised anti-corruption training for relevant officials.

Corruption prevention in respect of members of parliament

Recommendation i

10. *GRECO recommended (i) introducing precise rules defining and facilitating public consultation processes of legislation in Parliament, and assuring effective compliance thereafter; and (ii) enhancing the transparency of the parliamentary process by introducing rules for parliamentarians on how to interact with third parties seeking to influence the legislative process.*
11. It is recalled that, in the previous report, this recommendation was partly implemented. The first part of the recommendation had already been assessed as implemented. With respect to the second part of the recommendation, no rules had yet been developed on how parliamentarians should act in relation to third parties.
12. The authorities of Bosnia and Herzegovina report on the applicable rules on public consultation at Brčko District, noting that the Assembly's Rules of Procedure set detailed requirements for public discussions on draft laws, including publication, collection and consideration of opinions, and transparent decision-making. However, no separate formal rules yet govern individual contacts between parliamentarians and third parties outside this framework.
13. GRECO takes note of the information provided, which does not meet the second part of the recommendation, the implementation of which remains outstanding. While the first part of the recommendation on public consultation had already been assessed by GRECO as implemented, the continued lack of progress in adopting rules for parliamentarians on their interaction with third parties is regrettable. GRECO calls on the authorities to take resolute steps to address this lacuna.
14. GRECO concludes that recommendation i remains partly implemented.

Recommendation ii

15. *GRECO recommended that internal mechanisms be further articulated to promote and enforce the Code of Conduct for parliamentarians and thereby safeguard integrity within the legislature, including by (i) providing tailored guidance, counselling and training regarding ethical, integrity and corruption prevention related provisions, as well as (ii) developing effective oversight and compliance tools on these critical matters.*
16. It is recalled that, in the previous report, this recommendation was considered partly implemented. No new information had been provided regarding the proper

implementation of the Code of Conduct, either as concerns guidance, counselling and training (first component of recommendation ii), or the effective operation of the oversight mechanism (second component of recommendation ii).

17. The authorities of Bosnia and Herzegovina report that at Brčko District, the Assembly strengthened its ethics framework by adopting a Code of Conduct in March 2024, defining ethical principles, rules of conduct, violation procedures and oversight mechanisms. A dedicated Committee was established to supervise implementation and handle complaints, and a 2025 Training Plan was adopted, including specialised training on conflict-of-interest rules and ethical standards for Assembly members.
18. GRECO welcomes the steps taken by the Brčko District to put in place an integrity framework in its Assembly, notably through the adoption of a Code of Conduct, combined with monitoring, enforcement and awareness-raising measures. Over the years, the authorities have submitted separate information relating to the different entity levels. This information is welcome, and GRECO appreciates the efforts made by the Federation of Bosnia and Herzegovina, Republika Srpska and the Brčko District to advance integrity in their respective assemblies. That said, this recommendation targets the Parliament at State level (Skupština). No new information has been submitted in this regard to substantiate that the concerns about the proper implementation of the existing Code have been duly addressed. This applies both to guidance, counselling and training, and to the effective operation of the oversight mechanism.
19. GRECO concludes that recommendation ii remains partly implemented.

Recommendation iii
20. *GRECO recommended harmonising the legislation on conflicts of interest throughout the national territory.*
21. It is recalled that, in the previous report, this recommendation was not implemented. GRECO welcomed the adoption of the Law on Preventing Conflicts of Interest at State level in Bosnia and Herzegovina. However, no information was provided on how this law aligned with Entity-level systems.
22. The authorities of Bosnia and Herzegovina report that the Law on Preventing Conflicts of Interest at State level in Bosnia and Herzegovina applies only to state-level institutions. The Brčko District Assembly adopted a Law on Preventing Conflict of Interests in March 2021, establishing obligations for public officials to prevent conflicts of interest, including asset declaration requirements, rules on incompatibilities, restrictions on outside activities and gifts, and sanctions for violations. The law also created an independent Commission to enforce these rules and serves as the legal basis for conflict-of-interest prevention at local level. The process of drafting a new law to prevent conflicts of interest in the Federation of Bosnia and Herzegovina has been ongoing for years but it has not yet been adopted.
23. GRECO takes note of the information provided, which refers to legislation dating back to 2021 adopted at the level of the Brčko District. However, there is no substantiation that the objective of this recommendation has been fulfilled, namely that conflict-of-interest legislation across the national territory — where three different systems apply at State level, in Republika Srpska and in the Brčko District — has been harmonised.¹

¹ The European Commission [Bosnia and Herzegovina Report 2025](#) refers to the persistent lack of harmonisation of conflict-of-interest legislation throughout the national territory. There are marked differences in compliance with the law across the country. All levels of government need to fully align their legislation on conflict of interest with European standards and to implement the law in good faith.

24. GRECO concludes that recommendation iii has not been implemented.

Recommendation iv

25. *GRECO recommended (i) unifying the applicable requirements regarding financial disclosure in one single declaration form; (ii) introducing a duty to report the property of close relatives and to provide an update in the event of significant change in the information to be reported in the course of the legislative mandate; and (iii) ensuring the publication of and easy access to financial information, with due regard to the privacy and security of parliamentarians and their close relatives subject to a reporting obligation.*
26. It is recalled that, in the previous report, this recommendation was partly implemented. GRECO welcomed the new rules and procedures on financial disclosure for public officials, including parliamentarians, considering them in line with its requirements and the recommendation. However, the public register of declarations and the Commission's official website for publication had not yet been established.
27. The authorities of Bosnia and Herzegovina report that application of the State-level Law on Preventing Conflict of Interests began in September 2024, and the Commission for Deciding on Conflicts of Interest started its mandate in November 2024. The Commission began preparing by-laws and new asset declaration forms, which are pending approval, while technical arrangements for publishing declarations are still being developed.
28. At Brčko District level, asset reporting, updating and publication are fully regulated, with detailed declaration requirements, regular updates and a public asset register already in place.
29. GRECO welcomes the progress made in the Brčko District regarding financial disclosure. It regrets, however, that at State level — the addressee of recommendation iv — the technical arrangements for publishing declarations are still not finalised and therefore the outstanding third component of the recommendation has not yet been met.
30. GRECO concludes that recommendation iv remains partly implemented.

Recommendation v

31. *GRECO recommended (i) coupling the disclosure system with an effective control mechanism (including random verifications) and (ii) introducing appropriate sanctions for false reporting.*
32. It is recalled that, in the previous report, this recommendation was partly implemented. GRECO welcomed the rules and procedures for controlling and enforcing the asset and property declaration system for public officials, including parliamentarians. However, it noted that the Rulebook on collecting and verifying declaration data still needed to be adopted and effectively applied before the recommendation could be considered fully implemented.
33. The authorities of Bosnia and Herzegovina report that at State level, the Rulebook on procedures for collecting and verifying asset declaration data is still in preparation and awaiting submission to the Council of Ministers for approval.
34. The authorities also provide information regarding financial disclosure in the Brčko District, which is governed by its own conflict-of-interest legislation. This framework

establishes a control and sanctions mechanism through a dedicated Commission empowered to analyse declarations, carry out random and targeted checks, and initiate proceedings, supported by a data protection manual governing lawful data processing and access.

35. GRECO takes note of and welcomes the information provided on the financial disclosure arrangements in the Brčko District. However, the recommendation targets the State level. In this connection, the Rulebook on collecting and verifying declaration data — whose adoption and implementation, ensuring a proper control mechanism, GRECO expected would fulfil the recommendation — remains pending.
36. GRECO concludes that recommendation v remains partly implemented.

Recommendation vi

37. *GRECO recommended that the advisory, supervisory and enforcement regime regarding conflicts of interest be completely reviewed and properly articulated, notably, by ensuring its independence and timeliness, and by making it effective through a system of appropriate sanctions.*
38. It is recalled that, in the previous report, this recommendation was assessed as partly implemented. GRECO welcomed the mechanism for supervising and enforcing conflict-of-interest rules for parliamentarians, including sanctions, to be carried out by an independent Commission supported by the APIK. While the framework met GRECO's requirements, the Commission had only recently been appointed and, in the absence of practical results demonstrating its independence and functioning, the recommendation could not be considered fully implemented.
39. The authorities of Bosnia and Herzegovina submit that, in 2025, the Commission for Deciding on Conflicts of Interest held 14 sessions and adopted five regulations. These govern the maintenance of registers, the handling of gifts received by public office holders, the collection and verification of financial disclosure reports, the submission of asset declarations and the procedures for addressing conflicts of interest.² The Commission continued to work on cases inherited from the previous commission. In proceedings where the former Commission had already initiated proceedings (six *ex officio* and two following complaints), the Commission adopted five decisions establishing conflicts of interest. These included three cases involving the employment of a close relative and two cases involving business dealings with public authorities exceeding BAM 5 000 (EUR 2 557). Additionally, two other decisions concerned prohibited dealings with a parent company. The Commission also adopted two decisions to discontinue proceedings due to a lack of grounds for further action, while one case remained pending at the end of the reporting period. In addition, the Commission processed 13 requests for opinions, issuing 12 responses in the form of eight advisory opinions and four formal replies. One request remained pending. One of the advisory opinions included a recommendation to eliminate a conflict of interest within 30 days and provide evidence of compliance. The Commission also received 15 notifications of conflicts of interest, three of which were anonymous. After conducting preliminary checks, the Commission initiated proceedings in three cases, determined a lack of jurisdiction in three others and continued investigations in the remaining cases. Finally, the Commission issued 11 notifications regarding matters outside the scope of the Law on Preventing Conflicts of Interest and adopted two opinions on potential conflicts of interest. The Commission also answered one parliamentary question.

² [https://static.parlament.ba/doc/187512_lzvjestaj%20o%20radu%20\(B\).pdf](https://static.parlament.ba/doc/187512_lzvjestaj%20o%20radu%20(B).pdf).

40. GRECO notes that the Commission entrusted, at State level, with supervising and enforcing conflict-of-interest legislation is now operating and has produced some results. More specifically, in 2025, the Commission adopted a number of decisions establishing conflicts of interest and pronounced sanctions in this respect. In view of the foregoing, GRECO considers that the recommendation has been complied with.

41. GRECO concludes that recommendation vi has been implemented satisfactorily.

Recommendation vii

42. *GRECO recommended that the respective parliaments of the Republika Srpska, the Federation of Bosnia and Herzegovina and Brčko District of Bosnia and Herzegovina be invited, similarly, to take action in accordance with the recommendations issued in this section of the report.*

43. It is recalled that, in the previous report, this recommendation was partly implemented. GRECO had recognised the efforts made by the Brčko District but lacked comprehensive information regarding the Republika Srpska and the Federation of Bosnia and Herzegovina.

44. The authorities of Bosnia and Herzegovina report that the Brčko District Assembly reaffirmed its commitment, as expressed and evidenced by factual information throughout the present report, to implementing GRECO recommendations, preventing conflicts of interest, supporting legislative harmonisation across State and Entity levels, and cooperating with other institutions to strengthen integrity standards.

45. GRECO welcomes the steps taken by the Brčko District Assembly to enhance its integrity framework among its members. However, GRECO still lacks information regarding the Republika Srpska and the Federation of Bosnia and Herzegovina, which were also addressees of this recommendation.³

46. GRECO can only conclude that recommendation vii remains partly implemented.

Corruption prevention in respect of judges and prosecutors

Recommendation viii

47. *GRECO recommended that determined legislative and operational measures be taken to strengthen the High Judicial and Prosecutorial Council's role in protecting the holders of judicial and prosecutorial offices from undue influences – both real and perceived – including by (i) providing for separate judicial and prosecutorial sub-councils; and (ii) avoiding an over-concentration of powers in the same hands concerning the different functions to be performed by members of the High Judicial and Prosecutorial Council; and (iii) ensuring that decisions of the High Judicial and Prosecutorial Council on the appointment, promotion and disciplinary liability of judges and prosecutors are subject to appeal before a court.*

48. It is recalled that this recommendation was partly implemented in the Third *Interim* Compliance Report. GRECO welcomed the adoption of essential amendments to the Law on the High Judicial and Prosecutorial Council (HJPC) of Bosnia and Herzegovina, strengthening the HJPC's role in protecting the holders of judicial and prosecutorial office from undue influence. In particular, the new legislation established a regime for the prevention of conflicts of interest for its members, including the obligation to

³ See footnote 1. In 2017, the National Assembly of the Republika Srpska adopted a Code of Conduct for its members, which was published in the Official Gazette of the Republika Srpska, No. 83/17. No new development has since been reported.

declare assets and interests, the definition of incompatibilities for new appointments and secondary activities and rules for the termination of the mandate and the dismissal from the position of member of the HJCP. However, GRECO noted that separate judicial and prosecutorial sub-councils had not yet been established, and no information had been provided on any particular measure put in place to avoid an over-concentration of powers in the same hands concerning the different functions to be performed by members of the HJCP. While the new legal framework provides for an appeal before a court regarding decisions on appointments and disciplinary liability of judges and prosecutors, some gaps remained in this area. Notably, there was no judicial review of the decision to suspend an HJCP member. GRECO encouraged the authorities to keep the aforementioned considerations in mind when further refining the HJCP legislative framework.

49. The authorities of Bosnia and Herzegovina report that, in 2024–2025, the Ministry of Justice of Bosnia and Herzegovina led several steps to prepare a new comprehensive Law on the High Judicial and Prosecutorial Council, including consultations and approval of a draft by the Council of Ministers in March 2025. However, the law has not yet been adopted by Parliament.
50. GRECO regrets that no progress has been made in respect of this recommendation. A draft law on the High Judicial and Prosecutorial Council was the subject of a follow-up opinion adopted by the Venice Commission in March 2025.⁴ However, there have been no legislative developments since then. GRECO points to the concerns previously expressed regarding the remaining gaps that still need to be addressed in order to implement the recommendation fully.
51. GRECO concludes that recommendation viii remains partly implemented.

Recommendation ix

52. *GRECO recommended that further steps are taken to improve the performance appraisals (with a priority given to qualitative over quantitative criteria) to both enforce the high ethical and performance standards expected from judges and prosecutors and assist in identifying meritorious candidates for promotion.*
53. It is recalled that this recommendation remained partly implemented in the Third *Interim* Compliance Report. GRECO welcomed further regulatory progress so that judges and prosecutors could be evaluated according to a comprehensive evaluation system, including quantitative and qualitative criteria. However, it noted that further clarity was desirable on the interpretation and application of appraisal criteria to ensure that judges were not penalised for the reasonable exercise of judicial discretion.
54. The authorities of Bosnia and Herzegovina report that the HJPC adopted new criteria for evaluating the work of judicial office-holders in courts and prosecutors' offices in Bosnia and Herzegovina at a meeting held on 18 December 2024.⁵ Published in the Official Gazette on 27 December 2024, these criteria became effective immediately and have been applied since January 2025.
55. Analytical evaluation, focusing on qualitative aspects, now complements quantitative measures. The scoring system has changed: up to 40 points for work quantity, 10

⁴ European Commission for Democracy through Law (Venice Commission), Bosnia and Herzegovina - Follow-up Opinion to previous Opinions on the draft law on the High Judicial and Prosecutorial Council, [CDL-AD\(2025\)004-e](#), adopted by the Venice Commission at its 142nd Plenary Session (Venice, 14-15 March 2025).

⁵ The criteria have been published on the HJPC's website: <https://vstv.pravosudje.ba/vstvfo/B/141/article/143277> and <https://vstv.pravosudje.ba/vstvfo/B/141/article/143275>.

points for analytical quality of work and decisions, and an increased 50 points for the statistical quality of decisions. The quantity of work is scored based on the results achieved in terms of the annual orientation norm and the percentage of the case resolution plan realised. The statistical quality of decisions is determined based on the percentage of decisions quashed in relation to the total number of decisions confirmed, amended and quashed by the higher court. The analytical quality of work and decisions is determined using a form and in accordance with the court's actual competencies and the type of caseload handled by the judicial office-holders, and by assessing the following sub-criteria: consistency, the quality of the reasoning, oral and written expression skills, the manner of communicating with parties, other bodies and the relationship with colleagues, the quality of conducting proceedings and the willingness to accept additional work. Additional reforms include excluding final acquittals from certain calculations and tightening requirements for evaluating investigative orders. In addition, the evaluation process now mandates a conversation between evaluators and prosecutors and requires prosecutors' self-reporting.

56. In 2024, extensive consultations and workshops involving local stakeholders and foreign experts took place. By mid-2025, detailed instructions for applying and algorithmically selecting cases for analytical evaluation were issued.⁶ On 2 October 2025, the HJPC held a workshop in cooperation with international experts commissioned by the "EU4Justice Project", focusing on the application of criteria for evaluating judges' work in terms of the analytical quality of their work and decisions. Lastly, a workshop on the application of criteria for evaluating prosecutors' work was organised on 18 November 2025.
57. GRECO notes that new appraisal criteria were adopted by the HJPC in December 2024. GRECO considers that the refinement of the appraisal system represents an improvement, moving from a purely quantity-based approach to greater consideration of quality-based evaluation. The use of multiple evaluation sources and clearer criteria has the potential to strengthen objectivity and transparency. Since the system has only started operating in 2026, its effectiveness will ultimately depend on practical experience over time, ensuring consistent application and safeguards against subjectivity. In this regard, GRECO welcomes the organisation of targeted training workshops on the application of evaluation criteria, as a positive step towards ensuring their effective implementation.
58. GRECO concludes that recommendation ix has been dealt with in a satisfactory manner.

Recommendation xii

59. *GRECO recommended developing rules on conflicts of interest that apply to all judges and prosecutors, along with an adequate supervisory and enforcement regime.*
60. GRECO recalls that this recommendation remained partly implemented in the Third *Interim* Compliance Report. GRECO reiterated its appreciation for the effective monitoring of the implementation of rules on conflicts of interest by judges and prosecutors, but noted that no information had been given as to the establishment of a system of appropriate sanctions when violations of these rules had been found.
61. The authorities of Bosnia and Herzegovina submit that institutional mechanisms and records for monitoring the implementation of the Guidelines for the prevention of

⁶ In April 2025, the HJPC adopted Instructions for the application of criteria for evaluating the work of judicial office-holders in courts and prosecutors' offices in Bosnia and Herzegovina. In July 2025, the HJPC adopted Instruction on the algorithm for the random selection of cases for the analytical evaluation of the work of judicial office-holders.

conflicts of interest in the judiciary have been applied since early 2021. To strengthen this monitoring process, supporting documents are annually distributed to the heads of judiciary institutions. These records cover various aspects such as additional activities of judiciary officials, reception of gifts, ex parte communications, public appearances, complaints and disciplinary measures imposed, and exemptions of judiciary officials.

62. The authorities indicate that, in 2024, analysis of these instruments involved records submitted by 101 judiciary institutions in Bosnia and Herzegovina, totalling 2,039 entries across six categories. In the upcoming period, efforts will focus on long-term monitoring of reports, improving the accuracy and timeliness of data collection, and enhancing two-way communication between the HJPC and courts and prosecutors' offices. Continuous training and information dissemination regarding the guidelines, instruments for monitoring the guidelines and relevant conclusions of the HJPC are also prioritised, particularly on issues such as gifts and other benefits, communications, and public appearances.
63. Regarding the implementation of integrity plans, judiciary institutions submitted reports for the previous year by mid-2025. Based on these reports, the HJPC adopted the Annual Report on the implementation of integrity plans on 19 June 2025 and provided recommendations for further action. The report and recommendations are to be shared with the APIK, the ministries of justice as well as with all judiciary institutions, and to be published on the HJPC's website.
64. GRECO notes that monitoring of the implementation of the Guidelines for the prevention of conflicts of interest in the judiciary has continued. However, the monitoring carried out remains limited to the collection and analysis of relevant data, without any other consequences. GRECO reiterates that enforcement implies some form of sanction depending on the breach and its severity.
65. Consequently, GRECO concludes that recommendation xii remains partly implemented.

Recommendation xiii

66. *GRECO recommended (i) developing an effective system for reviewing annual financial statements, including adequate human and material resources, co-operation channels with relevant authorities and appropriate sanctions for non-compliance with the rules or false reporting and (ii) considering ensuring the publication of and easy access to financial information, with due regard to the privacy and security of judges, prosecutors and their close relatives.*
67. It is recalled that, in the previous report, this recommendation was partly implemented. GRECO welcomed the setting up of a comprehensive system within the judiciary for declaring assets and interests, including appropriate rules for declaring, recording, publishing and verifying data and for sanctioning violations of these rules. However, GRECO was expecting the independent Department tasked with enforcing the declaration system to be fully operational so as to assess the effectiveness of the system, in particular as regards the human and material resources allocated to this Department.
68. The authorities of Bosnia and Herzegovina recall that the process of collecting asset and interest declarations from judges, prosecutors, and members of the HJPC began in October 2024. Initially, the HJPC entrusted this task to its department responsible for disciplinary procedures and ethics, as the new department in charge of verifying asset declarations was not yet fully staffed (the process of appointing civil servants to this department was underway). In accordance with the HJPC's Rulebook,

declarations were to be submitted electronically through a specialised online portal,⁷ by post or delivered in person.

69. The authorities further report that the process was suspended in January 2025 following a decision by the Agency for the Protection of Personal Data in Bosnia and Herzegovina. The Agency ordered the HJPC to implement several administrative measures, notably limiting the processing of declarations solely to the designated department, prohibiting electronic submissions in the absence of electronic signature and due to concerns over identity verification, and revising data consent procedures. Consequently, the HJPC updated its Rulebook in May 2025 and adopted a revised security plan. Asset and interest declarations for 2024 had to be submitted using a new electronic form, while those for 2023 were retained in their original format.
70. Upon the asset declarations Department's official establishment in June 2025 - now with eight staff members and adequate resources - the submission and control of declarations resumed. The Department began carrying out the initial checks on the declarations as soon as it received them and adopted a methodology in this respect. By 23 September 2025, a total of 12 cases had been finalised (11 at the additional check stage and 1 at the regular check stage), while checks were ongoing in around 70 cases. Following further inquiries from the Agency for the Protection of Personal Data, the HJPC had to repeal the electronic form and replace it with an Excel-based reporting form. It also had to adjust consent procedures and data processing protocols and to revise its personal data security plan.
71. As of September 2025, 1,417 out of 1,477 obliged persons had submitted their 2024 declarations,⁸ and 1,393 reports for 2023 had been received, with ongoing verifications. The Department gathers explanations from those who failed to submit reports, referring potential disciplinary cases to the Disciplinary Prosecutor's Office, since non-compliance constitutes a disciplinary offence. Eight disciplinary procedures were initiated (six were initiated on 11 December 2025, one on 9 March 2026, and one on 26 March 2026) in connection with the offence in Article 56 and Article 57 point I (violation of the provisions of the Law on submitting declarations on assets and interests), two of which ended with suspension of the procedure due to retirement, while six procedures are still ongoing.
72. The Department adopted in the course of July 2025 essential working documents, such as methodologies and risk criteria for analysing asset declarations, and enhanced these further based on recommendations from an EU-funded external monitoring programme.⁹ Collaboration agreements have been established with multiple state and federal institutions, with ongoing negotiations in the Republika Srpska and Brčko District, as well as with the banking sector, to ensure that the Department has access to the necessary data to verify declarations. Despite some pending agreements, the authorities stress that information flows efficiently from all contacted bodies. To verify declared assets abroad, the Department initiated collaboration with the Ministry of Justice for international legal assistance and data exchange, with plans to include the Ministry of Foreign Affairs. In this respect, the Regional Anti-Corruption Initiative launched an initiative in 2021, offering an international agreement on data exchange for checking asset declarations. To date, Bosnia and Herzegovina has not signed this agreement.

⁷ Module of Personal Financial Declarations (MIK): <https://vstv.pravosudje.ba/vstvfo/S/141/kategorije-vijesti/1198/125761/125770>.

⁸ Of the 60 persons who did not submit their declarations, 27 persons had their mandates terminated. The Law on the HJPC does not provide any sanctions for these persons.

⁹ Under an agreement between the European Commission and the HJPC, EU external experts are monitoring the functioning of the revised asset declaration system.

73. Finally, transparency is fostered by publishing declarations and review outcomes on the HJPC's website,¹⁰ ensuring public access while safeguarding personal data as mandated by law. The Department is also required to produce semi-annual reports on its activities. The first report for the period 2 June – 2 December 2025 was issued on 22 December 2025 and published on the website of the HJPC.¹¹
74. GRECO notes that the new Department of the HJPC responsible for verifying the asset declarations of judges, prosecutors, and HJPC members began operating in June 2025. The Department has developed methodologies for an effective asset declaration verification system, as well as cooperation channels with the relevant authorities. GRECO also notes that funding has been secured for 8 of the 17 planned positions.¹² The first semi-annual report of the asset declarations Department underlines the need for additional staffing within the Department to further enhance the efficiency of its work. Almost all asset declarations have been submitted to date and are being processed. Furthermore, the declarations are published online on the HJPC's website. GRECO recognises that the authorities have made significant progress in addressing the concerns raised in the Fourth Round Evaluation Report, in particular as regards the establishment of a system for verifying asset declarations. GRECO trusts that, as this system develops further, its credibility and effectiveness will be ensured, notably by achieving full staffing levels and adequate technical resources, and by imposing sanctions in cases of breaches of the applicable rules.
75. GRECO concludes that recommendation xiii has been dealt with in a satisfactory manner.

Recommendation xiv

76. *GRECO recommended that (i) the independence, capacity and transparency of the activity of the Office of the Disciplinary Counsel be increased; and that (ii) the disciplinary procedure and sanctions in case of misconduct of judges and prosecutors be revised in order to ensure that cases are decided in a timely manner and that misconduct is effectively subject to proportionate and dissuasive sanctions.*
77. GRECO recalls that, in the previous report, this recommendation remained partly implemented. GRECO noted the position of the authorities according to which the independence, capacity and transparency of the activity of the Office of the Disciplinary Counsel (ODC) could not be increased considering its role and powers provided by the existing legislation. However, GRECO recalled that the members of the ODC should be independent from the members of the HCJP and have no access to individual pending cases, and that the disciplinary panels should be composed in such a way as to prevent corporatism. Therefore, the first part of the recommendation could not be considered as implemented satisfactorily. As regards the second part of the recommendation, GRECO noted an increase in the number of disciplinary proceedings but still could not assess the relevance of the sanctions given vis-à-vis the misconduct taken into consideration, as no information had been given as regards the cases concerned by disciplinary proceedings. GRECO considered that a big bulk of the recommendation thus remained not implemented.
78. The authorities of Bosnia and Herzegovina state that the HJPC's website provides essential information about the ODC, including its competences, instructions and forms for submitting complaints, relevant publications, and links to final disciplinary decisions. Due to legal requirements for confidentiality during investigations, broader transparency and greater access to certain documents are not possible.

¹⁰ <https://mik.pravosudje.ba/reporting-periods/5>.

¹¹ <https://vstv.pravosudje.ba/vstvfo-api/vijest/download/155353>.

¹² European Commission, Bosnia and Herzegovina Report 2025, 4 November 2025, p. 29, which also stresses that "full funding must be secured without delay to ensure the department can operate at full capacity."

79. In 2024, the ODC initiated 37 disciplinary proceedings involving 39 judicial office-holders, with one case covering three individuals. From 1 January 2024 to 23 September 2025, a total of 61 disciplinary cases were concluded - 31 in 2024 and 30 in 2025. Notably, 30 of these cases were resolved through an agreement. The sanctions imposed ranged from written warnings (9) and public warnings (13) to salary reductions (28) and dismissal (one case).
80. GRECO takes note of the information provided by the authorities, which demonstrates that the situation is unchanged from that reported previously. Notably, there has been no change in the independence, capacity or transparency of the activity of the Office of the Disciplinary Counsel. Moreover, no information has been provided regarding the timeframes for reaching decisions, and the relevance of the sanctions imposed cannot be assessed in the absence of details about the types of misconduct involved.
81. GRECO concludes that recommendation xiv remains partly implemented.

III. CONCLUSIONS

82. In view of the foregoing, GRECO concludes that Bosnia and Herzegovina has implemented satisfactorily or dealt with in a satisfactory manner six of the fifteen recommendations contained in the Fourth Round Evaluation Report. Of the outstanding recommendations, eight have been partly implemented and one remains not implemented.
83. More specifically, recommendations vi, ix, x, xi, xiii and xv have been implemented satisfactorily or dealt with in a satisfactory manner, recommendations i, ii, iv, v, vii, viii, xii and xiv have been partly implemented and recommendation iii has not been implemented.
84. With respect to members of parliament, progress has largely stalled. Further positive steps have continued at the Brčko District Assembly, particularly on integrity measures and financial disclosure arrangements for its members. At State level, the Commission for Deciding on Conflicts of Interest is now operating and has produced some results. However, key recommendations concerning the State-level Parliament are yet to be fully addressed. Rules on contacts with third parties, arrangements for the publication of financial disclosures, and their effective oversight and enforcement remain incomplete, pending or plainly lacking. No substantiation has been provided regarding the necessary harmonisation, implementation and enforcement of conflict-of-interest legislation across the national territory. The Federation of Bosnia and Herzegovina and Republika Srpska have not provided any updates on their actions in this area.
85. Regarding judges and prosecutors, two more recommendations have been dealt with in a satisfactory manner. The HJPC's adoption of new appraisal criteria in December 2024 is welcomed, as well as the establishment of a system for verifying asset declarations of judges, prosecutors and HJPC members, including rules for publishing data and for sanctioning violations in cases of breaches of the applicable rules. All other outstanding recommendations remain partly implemented. There has been no legislative development with a view to strengthening the HJPC's role in protecting the holders of judicial and prosecutorial offices from undue influence. The regime for preventing conflicts of interest among HCJP members still needs to be supplemented by an effective enforcement mechanism. The independence, capacity and transparency of the activity of the Office of the Disciplinary Counsel within the HJCP needs to be strengthened, and it should be ensured that misconduct of judges and

prosecutors is effectively subject to proportionate and dissuasive sanctions. The authorities are urged to take action on all of these important issues.

86. In view of the above, GRECO notes that the current level of compliance with the recommendations is no longer “globally unsatisfactory” in the meaning of Rule 31 revised, paragraph 8.3 of the Rules of Procedure. GRECO therefore decides not to continue applying Rule 32 concerning members found not to be in compliance with the recommendations contained in the Evaluation Report.
87. In application of paragraph 8.2 of Rule 31 revised of the Rules of Procedure, GRECO asks the Head of delegation of Bosnia and Herzegovina to provide a report on measures taken to implement the outstanding recommendations (i.e. recommendations i, ii, iii, iv, v, vii, viii, xii and xiv) by 30 June 2027 at the latest.
88. Finally, GRECO invites the authorities of Bosnia and Herzegovina to authorise, as soon as possible, the publication of the report, to translate it into the national language and to make this translation public.