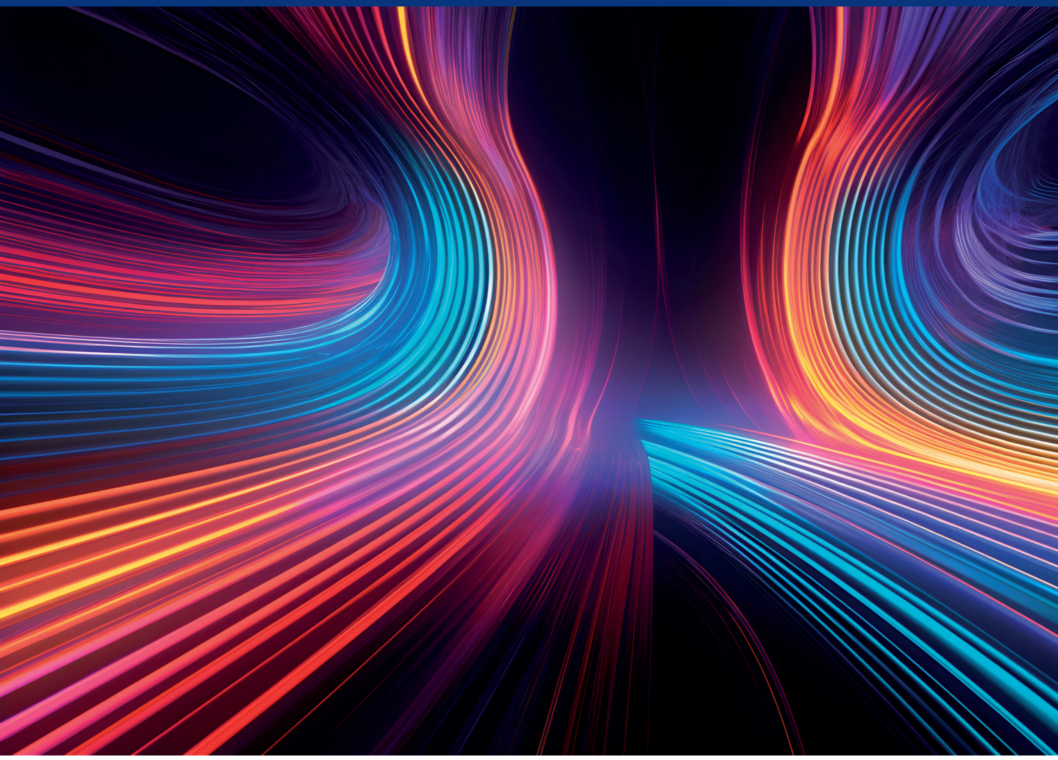
GROUP OF STATES AGAINST CORRUPTION (GRECO)

Anti-corruption trends, challenges and good practices in Europe & the United States of America



Featured article:
Key Principles, Trends and Challenges in GRECO's 5th Evaluation Round – Top Executive Functions in Central Governments and Law Enforcement Agencies

Anti-corruption body of the Council of Europe

26th General Activity Report (2025)

G R E C O
Group of States against Corruption
Groupe d'États contre la corruption

COUNCIL OF EUROPE
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26th General Activity Report (2025)
of the Group of States against Corruption (GRECO)

Anti-corruption trends, challenges and good practices in Europe & the United States of America

Adopted by GRECO
(March 2026)

Featured article:

Key Principles, Trends and Challenges in GRECO's 5th Evaluation Round – Top Executive Functions in Central Governments and Law Enforcement Agencies

Council of Europe

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INTRODUCTION BY THE PRESIDENT OF GRECO

***David MEYER**, Head of International Programmes & Rule of Law and Head of the Deputy Prime Minister's International Unit, International, Rights and Constitutional Policy Directorate, Ministry of Justice (United Kingdom)*

The Twenty-Sixth General Activity Report of the Group of States against Corruption (GRECO) provides an overview of our 48 members' action against corruption in 2025. With the adoption of thirty evaluation and compliance reports during the year, GRECO continues to build a thorough understanding of the challenges and progress in preventing and combating corruption across its membership.

In 2025, our member states across Europe, Kazakhstan and America continued to navigate evolving governance challenges, with anti-corruption and integrity remaining high on the agenda even as political polarisation, nationalism and populist pressures increasingly shape governance dynamics and the implementation of anti-corruption and integrity policies. As I underlined in my statement marking International Anti-Corruption Day, democracy itself is at risk without a strong culture of integrity and a sustained commitment to combating corruption. Democracy requires both ethical leadership and effective safeguards. Across the membership, particular attention must be paid to ensuring that reforms affecting key institutions responsible for preventing and combating corruption — including the judiciary, law enforcement, prosecution, and specialised anti-corruption bodies — preserve their independence, effectiveness and credibility.

In this context, GRECO's work remains more relevant than ever. Through its rigorous monitoring process and constructive dialogue with member states, GRECO promotes transparency, accountability and integrity in public life. The findings in this report point both to progress achieved and to challenges that remain, while also reflecting growing public expectations for higher standards of integrity and stronger links between integrity, democracy and public trust.

At a time of declining trust in institutions, including at the local level, and growing geopolitical tensions, corruption prevention is not only a matter of good governance but also a key component of democratic resilience. Strong integrity systems are essential to safeguarding democratic institutions, protecting public decision-making and maintaining citizens' trust.

The year 2025 also marked the launch of GRECO's 6th Evaluation Round, with the first four evaluation visits to member states taking place. This new round is particularly timely, focusing on strengthening corruption prevention and promoting integrity at the local and regional levels of government, where public authorities are closest to citizens and where transparency and accountability are essential to maintaining public trust in government institutions. GRECO continues to work closely with the Congress of Local and Regional Authorities of the Council of Europe, whose expertise and engagement provide valuable support in advancing integrity standards and fostering a culture of good governance across Europe. GRECO members also engaged in dialogue with youth representatives and young leaders, including mayors, an exchange which provided valuable perspectives and underlined the importance of strengthening engagement with younger generations on integrity and good governance.

At the same time, GRECO's monitoring, guidance and policy dialogue constitute a central contribution to the New Democratic Pact for Europe, which underscores that strengthening integrity, accountability and transparency in public life is essential to safeguarding democratic institutions and maintaining citizens' trust.

During the year, GRECO further developed its advisory function and issued thematic papers compiling lessons learned and good practices in areas of particular relevance to its members. In 2025, these papers addressed access to information and the protection of whistleblowers in law enforcement, highlighting the importance of transparency and safe reporting mechanisms as essential components of effective corruption prevention. GRECO also published a Study on key principles, trends and challenges identified through its 5th Evaluation Round, the main findings of which are highlighted in this year's report. Together, these analytical contributions provide strategic insights to support member states in strengthening their integrity frameworks and anticipating emerging corruption risks.

I also welcome the continued engagement with civil society. The side event held in 2025 provided a valuable opportunity for dialogue and the exchange of perspectives on strengthening anti-corruption efforts. Civil society representatives have also contributed to GRECO's 6th Evaluation Round visits, bringing valuable insights and perspectives to the monitoring process. Such engagement strengthens the broader integrity ecosystem and contributes to fostering a culture of transparency, accountability and public trust, thereby reinforcing the effectiveness and legitimacy of GRECO's work.

GRECO remains firmly committed to strong international co-operation, recognising that the fight against corruption transcends borders and jurisdictions. To this end, we engage closely with key global partners, including the United Nations (UNODC), the OECD, the Organization of American States (OAS) and the World Economic Forum. GRECO also actively contributes to international policy fora, including the OECD Working Group on Bribery in International Business Transactions and the Working Party of Senior Public Integrity Officials (SPIO). These organisations hold observer status with GRECO, as GRECO does with them, creating valuable opportunities for the exchange of expertise, policy dialogue and the dissemination of good practices. Regular co-operation between our respective secretariats further ensures alignment of priorities and effective co-ordination in strengthening the global anti-corruption architecture.

Such co-operation is equally important at the European level, particularly in light of the European Union's growing role in shaping anti-corruption standards, policies and legislative initiatives. In this evolving context, GRECO remains committed to exploring avenues for the European Union's participation as a full member, which would further strengthen coherence, complementarity and collective action in advancing integrity and combating corruption across Europe.

Regarding the resources available to GRECO, I wish to express my appreciation to the Statutory Committee for its continued support, which enables GRECO to carry out its work in an effective and efficient manner. As a highly cost-effective monitoring mechanism, GRECO relies on the sustained commitment of its members to ensure that its evaluation and compliance activities can proceed at the necessary pace and depth. Adequate and predictable resources are essential to maintaining the quality, credibility and continuity of GRECO's monitoring process and to enabling it to fulfil its mandate consistently and independently across all member states.

I would also like to express my sincere appreciation to the Secretary General for his steadfast support for GRECO's work, including through his high-level bilateral engagements. His efforts to promote the implementation of GRECO's recommendations at the highest political level are invaluable. I trust that this strong support will continue in the years ahead.

As this report illustrates, GRECO's monitoring process continues to provide an important framework for supporting reforms and strengthening integrity across its membership. The continued credibility and impact of GRECO's work ultimately depend on the effective implementation of its recommendations. I therefore remain confident that member states will pursue their reform efforts with determination and translate GRECO's recommendations into tangible improvements in transparency, integrity and accountability in public life.

99th GRECO Plenary Meeting

Launch of the 6th Evaluation Round


High-level mission to Denmark


6th Round Evaluation: On-site visit to Estonia


High-level mission to the Slovak Republic


High-level mission to Türkiye


100th GRECO Plenary Meeting


6th Round Evaluation: On-site visit in Luxembourg


101st GRECO Plenary Meeting


High-level mission to Poland

KEY FINDINGS

GRECO's evaluation work continued at full pace in 2025. GRECO carried out four evaluation visits during the year, one ad-hoc visit (Rule 34) and three high-level visits. It adopted one evaluation report, 28 compliance reports, and one *Ad hoc* (Rule 34) report. The information set out below about GRECO's findings is based on the reports made public in 2025.

4th Round – Prevention of corruption in respect of members of parliament, judges and prosecutors

In 2025, GRECO adopted five compliance reports concerning the 4th Round dealing with the prevention of corruption in respect of members of parliament, judges, and prosecutors. Eleven compliance reports were made public in 2025 following authorisation by the member states' national authorities.

Overall, GRECO's 4th Round compliance work in 2025 shows varied levels of progress. Out of the eleven compliance reports made public in 2025, in three cases (27%) GRECO was able to terminate the 4th Round compliance procedure following substantial implementation of the recommendations. In three further cases (27%) the compliance procedure continued. By contrast, in the remaining five members (46%) the level of compliance was assessed as "globally unsatisfactory". Across all member states concerned, the 4th Round compliance procedure has been ongoing for extended periods, with most procedures extending for 9 to 13 years. This raises concerns about the timeliness and effectiveness of reforms in a significant number of members.

Some progress has been made in the development of integrity frameworks for members of parliament. In some member states, codes of conduct or equivalent standards are in place and provide a basic reference for parliamentary work, and in others broader legislative schemes seek to establish a more uniform and values-based framework for members of parliament's ethical conduct. However, these standards often remain overly general and are not consistently supported by practical guidance on key integrity risks. One member state has yet to adopt a code of conduct. Moreover, supporting measures remain insufficient in several members: confidential counselling on integrity issues is absent or underdeveloped, and specific, periodic training and awareness-raising on ethics and conflicts of interest remain to be firmly embedded in practice, notwithstanding the introduction of regular training in one member state.

Some progress has also been made regarding conflicts of interest and financial disclosure frameworks for members of parliament. In some member states, new or enhanced frameworks have been developed, but their effectiveness has yet to be demonstrated in practice, and in one member state a specialised entity assessing declarations and an electronic platform for single declaration are now operational. A public registration system of occupations and financial interests exists in one member state. Regrettably, conflicts-of-interest rules, mechanisms for declaring conflicts in relation to specific draft legislation (including family interests) and recusal rules remain incomplete in several members. Likewise, asset-declaration regimes, monitoring and effective, proportionate and dissuasive sanctions have not been given due consideration or still require effective enforcement.

Further efforts are needed to regulate gifts and other benefits for members of parliament, despite some initial progress. In one member state, new rules on the acceptance of gifts, hospitality and other privileges have been introduced and relevant guidelines are now available online. In another, guidance has been issued on how to deal with gifts and other advantages, while more detailed rules on acceptance, valuation and disclosure are still required. Regulations on gifts and their public disclosure remain at the stage of stated intentions and have not yet been translated into applicable rules in another case.

As regards the transparency of the legislative process, progress remains uneven. In one member state, compliance with deadlines in the law-making process is regularly monitored by a parliamentary body, and the use of statistics in this respect has been encouraged, contributing to greater transparency and oversight. In another, a new law provides for openness and inclusiveness in the work of parliamentary committees and guarantees the right to access information on law-making. In some member states, transparency at committee and sub-committee level, including contacts with third parties, remained insufficient. GRECO continued to observe that the frequent use by several states of urgent or fast-track procedures remained a concern, and recalled the need to ensure that legislative processes allow for adequate transparency and scrutiny.

GRECO continued to observe that regulation of lobbying in relation to parliament remains at an early stage. No member state concerned has yet put in place a fully established and functioning framework, although one member state has adopted a law on lobbying that is due to enter into force. In several member states, interactions between members of parliament and lobbyists or other third parties seeking to influence the legislative process remained either not regulated or only partially regulated. Clear guidance and specific, comprehensive rules are still needed to ensure transparency and accountability in such interactions, and GRECO reiterated the importance of establishing robust safeguards to prevent undue influence over parliamentary decision-making.

GRECO also assessed how member states complied with its recommendations on preventing corruption of judges and prosecutors and on safeguarding the integrity, transparency, accountability and independence of the judiciary. In 2025, **ongoing reforms** in several member states, including the establishment or strengthening of judicial appointments bodies, ethical frameworks and disciplinary mechanisms, signalled continued momentum. **However, GRECO remained concerned by persistent risks to judicial independence, including politicisation and blockages in judicial governing bodies, uneven safeguards for prosecutors' independence, and delays in putting in place transparent, merit-based systems for appointments, case allocation and discipline.**

Several important developments to strengthen integrity frameworks for judges and prosecutors were observed, but significant gaps persist. A code of conduct for judges, supported by an ethics body, has been adopted in one member state, while in another, prosecutors operate under formal ethical standards underpinning integrity training and further legislative anchoring was envisaged. Obligations to declare assets and interests have been introduced in one member state, although effective verification still remained to be ensured, and in another more thorough scrutiny for prosecutors' declarations was required. Ethics training has expanded, including first ethics courses for all judges and regular training linked to performance evaluation, but remained unavailable to lay judges in one member state. Dedicated confidential counselling systems for judges and prosecutors have been established in a few states, or were being established in some member states, while they were still lacking in one.

Disciplinary frameworks for judges and prosecutors have been adjusted in several member states, yet key safeguards remain outstanding. In one member state, reforms clarified incompatibilities, regulated termination and dismissal and subjected decisions on appointments and discipline to judicial review; however, the disciplinary office still requires greater independence and resources, and sanctions were not consistently proportionate and dissuasive. In another member state, disciplinary practice had been reviewed, and further action was needed to clarify liability for breaches of ethics, and to ensure that decisions on disqualification were being taken without the participation of the judge concerned and could be appealed. In one member, the overall system for prosecutors' discipline and evaluation remained under discussion.

Further efforts are required to safeguard the independence of bodies responsible for judicial and prosecutorial appointments and governance. In some member states, new or revised appointment structures have been introduced to promote merit-based selection, although proposals are not always binding on the executive. Judicial councils have been strengthened to address integrity risks and protect officeholders from undue influence in four member states. In two others, plans to ensure that members of the judicial council are judges elected by their peers and to strengthen safeguards for prosecutors' tenure have yet to be implemented. Serious concerns persist where renewal of the judicial council has been blocked for years or where no progress has been made in revising the council's composition and the method for selecting higher court judges, raising questions about politicisation and independence.

Selected Good practice from the 4th Round

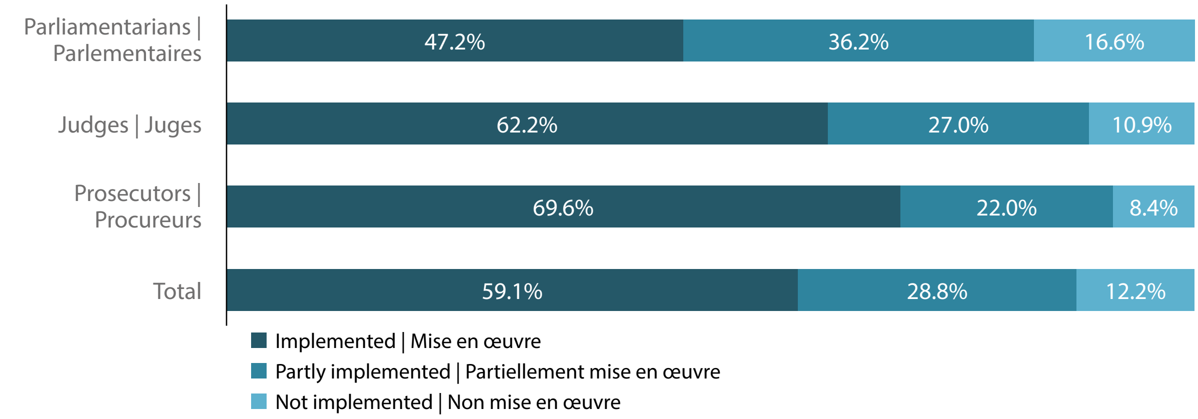
Confidential advice, training and awareness (judges) – Liechtenstein

A first training course for Liechtenstein judges on judicial ethics took place in April 2024 and amendments to legally secure confidential advice for judges have been adopted. Confidential advice is now made available to all judges on a permanent basis.

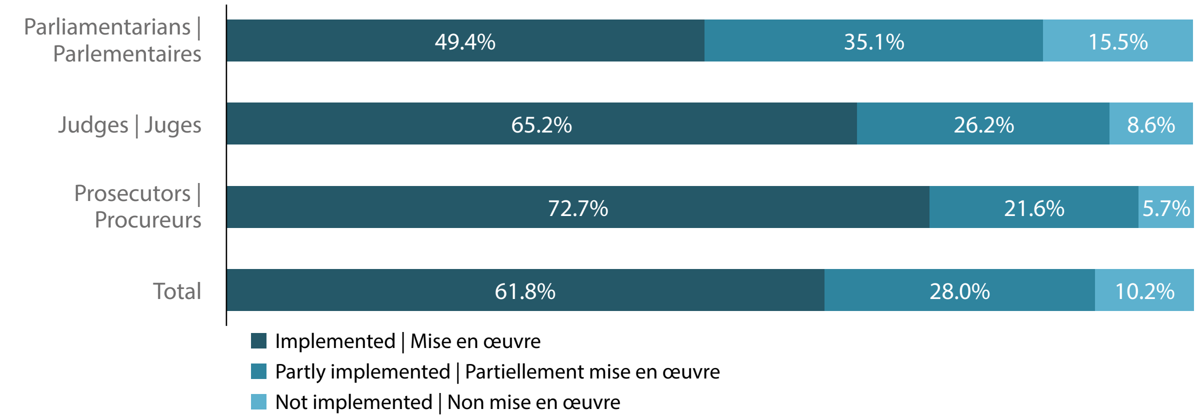
Figure 1 – Implementation of 4th Round recommendations by GRECO member states 2024-2025

Readers should bear in mind that the member states are at different stages of GRECO's procedure for the round and that the duration of a monitoring procedure varies - from the baseline evaluation report through the compliance procedure until the closing of the round in respect of each state. The statistics take account of all compliance reports made public by the end of 2024 or 2025, respectively.[1]

Situation at end 2024 (47 member states)
Situation fin 2024 (47 états membres)



Situation at end 2025 (47 member states)
Situation fin 2025 (47 états membres)



1. At end 2025, the following countries were in the non-compliance procedure under the 4th Round (application of Rule 32): Austria, Bosnia and Herzegovina, Denmark, Poland (inc. Rule 34 follow-up), Portugal and Türkiye.

5th Round – Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies

GRECO's 5th Evaluation Round deals with two categories: persons with top executive functions (PTEFs), and law enforcement agencies (LEAs). The two groups selected by GRECO are different in scope and powers, yet their ability to maintain and demonstrate integrity, as well as their capacity to cope with their internal corruption-related risks, are vital for the proper functioning of democracies based on the fundamental values of the rule of law and the protection of human rights.

In 2025, GRECO adopted 20 compliance reports concerning the 5th Round. In the same year, 23 reports (1 evaluation report and 22 compliance reports) were made public following authorisation by the member states' national authorities.

The implementation of GRECO's recommendations concerning the 5th Round continues to be overall unsatisfactory, with widening disparities among member states. While several follow-up reports recorded tangible progress, leading to the termination of the procedure in six cases, many others show that only a limited number of recommendations have been satisfactorily implemented, with most remaining partly or not implemented. In a number of cases, the situation continues to be assessed as "not in sufficient compliance". Overall, the reports point to more consistent progress in respect of law enforcement agencies than for PTEFs, where key integrity safeguards often remain incomplete.

PERSONS WITH TOP EXECUTIVE FUNCTIONS (PTEFS)

Setting the proper tone for integrity in government and society should start with those in top executive functions who should lead by example. Irrespective of differences in the form of government and traditions, GRECO focused on the following major topics:

- Anticorruption and integrity policy, regulatory and institutional framework
- Transparency and oversight of executive activities of central government
- Conflicts of interest
- Prohibition or restriction of certain activities
- Declaration of assets, income, liabilities and interests
- Accountability and enforcement mechanisms

Anticorruption and integrity policy, regulatory and institutional framework

Establishing clear rules and standards of conduct for PTEFs strengthens a country's anti-corruption framework and helps counter the perception in some societies that top executive officials receive special treatment. In 2025, in one member state, GRECO recommended adopting and making public an anti-corruption strategy focused on PTEFs, a public code of conduct for government members, backed by effective supervision and dissuasive sanctions, together with systematic briefings and training and documented confidential counselling.

Codes of conduct for PTEFs continued to be developed or revised, but their scope and practical impact remain uneven. In the majority of member states, new or draft codes of conduct or ethics frameworks for government members and other PTEFs were adopted or were being prepared. However, important gaps persist, notably as regards completeness, coverage and practical guidance: some codes are still at draft stage, do not cover all categories of PTEFs, have not yet been made public, or lack detailed guidance and procedures for implementation. Regrettably, in one member state, no dedicated code of conduct for PTEFs has yet been adopted.

Supervision and oversight of integrity standards and integrity-risk management for PTEFs remain uneven and in many cases insufficiently robust. Many member states reported steps to strengthen or operationalize bodies responsible for ethics supervision, conflicts of interest or transparency, or to develop risk-analysis tools and anti-corruption strategies for central government. However, several structures are still non-operational or lack clear powers and resources. In addition, several countries have yet to complete comprehensive integrity or corruption-prevention plans.

Mechanisms to promote and raise awareness of integrity matters among PTEFs remain necessary, and implementation remains inconsistent. In a number of member states, new or planned measures include induction and in-service training on ethics and conflicts of interest, guidance materials complementing existing codes, integrity plans and structured briefing sessions for government members and political advisers. Regrettably, in several members, training on existing codes of conduct is still absent or needs to be stepped up. GRECO also observed that training does not systematically cover all relevant categories of PTEFs, notably ministers, state secretaries and other senior officials, and that ensuring broad participation remains a challenge.

Progress in establishing confidential counselling mechanisms for PTEFs remains limited. While some member states envisaged or established dedicated advice channels, ethics commissions or counsellors to support PTEFs in addressing ethical dilemmas and conflicts of interest, the practical functioning of such mechanisms remained to be demonstrated in some cases. Elsewhere, confidential counselling has not yet been introduced. Several reports underline the need to ensure that counselling arrangements provide full guarantees of confidentiality and impartiality, including by dissociating counselling from control functions and by removing disincentives to seeking advice.

Transparency and oversight of executive activities of central government

Transparency and oversight of PTEF's contacts with lobbyists and other third parties remain a recurrent concern in several member states. Some progress is noted where steps have been taken to clarify or structure such interactions, including measures to better trace external input into executive decision-making and to broaden transparency requirements, as well as the publication of guidance on PTEFs' engagement with lobbyists and third parties. At the same time, GRECO recommended that rules be introduced to govern such contacts and that meaningful information be disclosed on their purpose, counterpart and subject matter, as gaps in disclosure obligations – including as regards advisers and private offices – remain evident in several systems. More generally, lobbying regulation is still missing or at an early or preparatory stage in a number of members, while initial rules have only recently emerged in some contexts.

Transparency of law-making and public participation showed gradual and uneven progress. Several member states reported reforms to improve public participation, including by making consultation on draft legislation more effective, by launching an e-platform for public consultation, reinforcing consultation and impact-assessment rules and publishing online information on those invited to, and present at, government working groups. GRECO also recommended that clear rules be adopted for government-led public consultations, including adequate timelines and only specific and limited exceptions . Nonetheless, key recommendations remain outstanding in several members. Further action is still needed to make the law-making process more transparent and to ensure the effective application of consultation requirements, to secure meaningful consultations and limit recourse to emergency ordinances, to strengthen transparency surrounding the work of secretaries general and ministerial advisers, and to ensure the consistent online publication of consultation outcomes.

Access to information and disclosure of official information continued to evolve, but important challenges remain in ensuring that access regimes are comprehensive, effectively applied and implemented in practice. Some progress is noted through the adoption, or envisaged adoption, of freedom-of-information legislation, the development of tools to improve the implementation of existing rules and demonstrated oversight of access-to-information requirements. GRECO also recommended that access-to-information frameworks be subjected to independent and through review, notably as regards exceptions, deadlines, fees and enforcement, and that further measures be taken to strengthen public access and a culture of openness. At the same time, concerns persist as regard alignment with relevant Council of Europe standards, the effective application and efficiency of access regimes, and shortcomings in public access to official documents in practice. In addition, in one case, GRECO called for greater transparency and regular public reporting by a dedicated corruption-prevention working group.

Conflicts of interest

To prevent corruption, effective management of conflicts of interest is crucial. GRECO continued to recommend improving the handling of conflicts of interest, both regular and *ad hoc*, by clearly defining applicable rules and procedures, and that integrity checks take place upon appointment of PTEFs, in order to identify and manage possible conflicts of interest.

Conflicts of interest safeguards for PTEFs still display significant shortcomings across a number of member states. While some steps have been reported, including the adoption of dedicated legislation in one member, implementation and control mechanisms remain fragile. In some cases, there is still no genuine scrutiny of conflicts of interest, and *ad hoc* disclosure obligations do not apply to key office-holders.

Elsewhere, the lack of an effective registration of abstentions from decision-making where conflicts arise remains an outstanding concern. Institutional arrangements for supervision and enforcement also raise concerns, notably where the competent body is not yet operational or where oversight lacks sufficient independence and resources.

Prohibition or restriction of certain activities

In 2025, GRECO recommended strengthening and applying post-employment restrictions to all PTEFs, and putting in place an effective enforcement mechanism for these rules.

Prohibition or restriction of activities for PTEFs, in particular post-employment safeguards, remains insufficiently developed in several member states. Reports highlight missing or incomplete frameworks, including the absence of rules on incompatibilities and vetting for persons hired at the discretion of central government, the need to introduce or to review post-employment restrictions, and to broaden their scope to additional categories such as cabinet members and political appointees. In one case, GRECO also noted that effectiveness may be undermined where tangible sanctions for breaches lack. On a more positive note, rules have been strengthened for certain senior officials in one member state, and the issue was under examination in another.

Declarations of assets, income, liabilities and interests

Declaration of assets and interests for PTEFs continued to develop, but major shortcomings persist as regards accessibility, systematic control and enforcement. Some progress is noted through unified or strengthened declaration systems and related mechanisms, the launch of electronic platforms and database to support submission, registration and verification, and analytical or technological measures to enhance checks and accuracy controls. In one member state, guidance and transparency arrangements for declarations of interests have been updated. GRECO recommended requiring regular public declarations of assets, income, liabilities and financial interests, considering the inclusion of spouses', partners' and dependent family members' financial information, and subjecting declarations to appropriate review.

However, important gaps remain; in some members, obligations and publication requirements are still incomplete or insufficiently regular; in others, the scope of declaratory regimes needs to be widened or extended to additional categories; and in several cases, more robust, proactive checks and dissuasive sanctions are still lacking.

Accountability and enforcement mechanisms

Enforcement of codes of conduct should be ensured through effective supervision mechanisms, accompanied by appropriate sanctions. GRECO continued to observe that, in several member states, there is still no effective mechanisms to monitor PTEFs' compliance with integrity standards, or that such mechanisms remain incomplete. It also notes persisting gaps where rules do not clearly address how alleged breaches by the highest office-holders would be handled, and where non-criminal sanctions for breaches of ethical standards remain insufficient. GRECO consistently recalls that sanctions should be adequate, effective, proportionate and dissuasive.

The effectiveness of accountability framework depends on the capacity and functioning of oversight bodies tasked with prevention, monitoring and control. GRECO observed that institutional reforms may have limited practical impact where key bodies are not yet fully operational. In another member state, analyses of monitoring processes have been carried out, but follow-up to the resulting recommendations remains pending. Even where relevant bodies are in place, strategic and institutional frameworks may still require further consolidation to support the effective implementation of integrity measures.

The handling of corruption cases involving PTEFs requires a criminal justice response that is effective, independent and equipped with appropriate tools, while special procedures should not impede accountability. GRECO recommended revising powers that may allow criminal investigations and proceedings concerning corruption-related offences involving PTEFs to be blocked or discontinued. Further progress also remains necessary to strengthen the overall response to corruption offences, and long-standing concerns persist where specialised investigative tools and the treatment of resulting evidence have not been adequately addressed. GRECO reiterated that special procedures applicable to members of government should be limited so as not to hamper the investigation, prosecution or adjudication of corruption-related offences.

LAW ENFORCEMENT AGENCIES (LEAS)

LEAs have the authority and powers to tackle crime. Given their authority to enforce the law, law enforcement officers should always be aware that they are bound by high standards of integrity. In respect of law enforcement, GRECO has focused on the following major topics:

- Anticorruption and integrity policy
- Recruitment, career, and conditions of service
- Conflicts of interest
- Prohibition or restriction of certain activities
- Declaration of assets, income, liabilities, and interests
- Oversight and enforcement

Anti-corruption and integrity policy

Risk assessment is increasingly recognized as the cornerstone of targeted integrity and anti-corruption strategies in law enforcement. GRECO recommended that corruption-prone areas and activities be assessed systematically and that the findings be used to design a dedicated integrity and anti-corruption strategy, made known to the public. Preparatory steps have been reported, including the approval of a risk-assessment methodology intended to inform a future corruption-prevention plan, and increased attention to corruption risks through administrative security investigations. At the same time, dedicated strategies remain incomplete or pending in several countries, and progress remains mixed where risk assessments have been undertaken but strategic prevention frameworks are not yet fully in place for all forces.

Codes of conduct and practical guidance continued to be strengthened, but implementation gaps persist. Progress includes the adoption of codes of conduct tailored to the specific needs of the police, revisions and concrete guidance coupled with systematic mandatory training and awareness-raising, and a police ethics manual with practical examples supported by training. Further steps include an explanatory guide on ethics, complemented by training, and the adoption of ethics standards by a specialized law enforcement body, alongside strengthened training arrangements. However, several frameworks remain under development or at draft stage and still require tangible outcomes and practical follow-up. In other contexts, integrity provisions remain general and insufficiently operational, and implementation measures remain limited. GRECO also recommended in one case that a comprehensive police code be developed, and published, complemented by practical guidance and coupled with oversight and enforcement.

Confidential counselling and compulsory integrity training remain essential to support officers facing ethical dilemmas and integrity risks. GRECO recommended strengthening mandatory ethics and integrity training for new recruits and serving officers and institutionalising confidential counselling. Operational counselling arrangements are reported as completed or available in some systems, and ethics advisers have been appointed to provide confidential advice. Nonetheless, in some member states counselling mechanisms still require targeted action to become fully operational, remain to be established, or are not available to parts of law enforcement. Training has been strengthened through comprehensive curricula and planned updates linked to new ethics standards, and reinforced training has been reported elsewhere.

Recruitment, career and conditions of service

Recruitment, career and conditions of service should be governed by transparent, merit-based procedures and systematic integrity checks. GRECO notably called for integrity screening to take place prior to recruitment and regularly throughout police careers, including for sensitive functions and managers. Progress is observed where integrity checks are being strengthened at recruitment and during service, and where vetting renewals have been improved. Integrity-focused evaluation of senior management has also been reported, while stability at senior management level has increased in another case, albeit with career-long integrity screening still to be completed. At the same time, GRECO continued to call for stronger screening of new recruits, greater transparency and public scrutiny of senior appointments and promotions, and more objective appraisal criteria and regular vetting arrangements. Additional attention is also needed regarding staff rotation in areas exposed to corruption risks.

Gender balance within law enforcement agencies still requires sustained attention, notably as regards career progression and access to leadership positions. Several members were encouraged to intensify efforts and ensure that initiatives translate into more decisive outcomes. In other cases, dedicated action has yet to be developed to address balanced representation in the police. On a more positive note, steps aiming at a steady increase in women's representation, including in management posts, have been reported in one country.

Organisation and accountability

Operational independence and accountability remain fundamental for impartial and trusted law enforcement. GRECO continued to observe that risks of undue influence persist, notably where the operational management remains too closely dependent on ministerial decision-making or where stronger guarantees of autonomy from the ministry are still required. Persistent gaps regarding operational independence and political neutrality were also noted in one case, while implementation measures to strengthen operational independence through inspection activity and targeted training have been reported in another. Strengthening professional standards and disciplinary capacity can support accountability where reforms have been pursued.

Conflicts of interest

Managing conflicts of interest effectively remains central to safeguarding integrity within law enforcement agencies. In several member states, GRECO reiterated the need for clearer rules, practical arrangements and oversight capable of preventing real, potential or perceived conflicts. Further action is still needed to establish regular integrity checks focusing on such risks and to strengthen prevention both in service and upon end of employment, to implement dedicated safeguards, and to introduce rules for disclosure and management within specific forces. On a more positive note, in one member state internal policies have evolved to make *ad hoc* reporting mandatory.

Prohibition or restriction of certain activities

Secondary employment and other outside activities by law enforcement officers require clear rules, transparent authorization and effective oversight. In one member state, this aspect has not yet been addressed as a core element of conflict-of-interest management. Elsewhere, measures were taken to regulate outside activities more effectively, or policies were amended to introduce clearer assessment criteria and a uniform procedure for parallel occupations. In another case, an internal human resource system now records outside activities and work is ongoing to develop effective oversight arrangements. By contrast, in other member states no new steps were reported to improve authorization procedures, or draft amendments remained under internal review.

Post-employment activities

Progress on post-employment safeguards has been variable. In some cases, the practical risks linked to former officers' post-employment still need to be examined and addressed. Against this background, GRECO recommended a specific study and, where warranted, rules to ensure transparency and mitigate risks. Post-employment restrictions remain absent in one case. More positively, in one member a comprehensive study has been completed, accompanied by proposals to mitigate risks of conflicts of interest and others put in place specific restrictions.

Declaration of assets, income, liabilities and interests

Declarations of financial interests by senior police officials still require further consolidation, notably through clear coverage, effective control and follow-up. Some progress is noted where the financial disclosure regime for top police leadership has been strengthened. However, outstanding shortcomings persist, including the need to address declarations for particularly vulnerable posts, to translate state intentions to strengthen controls into tangible measures, and to revisit – where still absent – the analysis of whether targeted officials should be required to declare financial interests. In addition, adopting a new scheme to report and register financial interests remains required for specific services.

Rules and registers on gifts, donations and sponsorship continued to evolve, but transparency and consistent application remain central. Positive steps include work to develop guidance requiring the recording and publication of donations and other benefits, clearer rules on donations and sponsorship and a more detailed ethics provisions restricting gifts and benefits liable to affect official duties, and a legal framework with a completed gift regime with supervision and enforcement. Transparency has also been strengthened through the online publication of donations. Additional efforts remain necessary to improve transparency on donations and sponsorships and to introduce further measures to report and centrally register accepted gifts. In one member, a gift policy has also been adopted within one service, albeit with integrity standards still framed in general terms.

Oversight and enforcement

Internal control mechanisms within law enforcement agencies remain central to effective oversight and accountability, yet important gaps persist. Some member states reported reforms underway or clearer arrangements for internal oversight arrangements. At the same time, GRECO continued to call for more robust capacity and resourcing of internal control structures and for stricter, more proactive internal oversight in practice. In several cases, recommendations remain outstanding to enhance the effectiveness of internal control. A particular concern remains in some cases the absence of an independent complaint mechanism.

Whistleblower protection continued to evolve, but implementation remains uneven. New or reinforced safeguards and internal reporting arrangements were reported, including legal and procedural measures to protect against retaliation and the establishment or alignment of reporting channels in several member states. Training and awareness measures have also been introduced or further developed, while training modules covering whistleblowing are still under development and have yet to be put into practice in one case. Nonetheless, GRECO continued to note in one member state that the overall framework still requires substantial strengthening, in another that follow-up and feedback remain insufficient, and in several cases that awareness-raising and take-up of mechanisms need to be improved. Further efforts are also needed to strengthen practical application and to address the absence of effective internal reporting channels, which undermines trust and accountability. GRECO recommended reinforcing anti-reprisal safeguards and dedicated training across chains of command.

GRECO also underlined that complaints against the police should be handled through mechanisms that ensure independence, effectiveness and transparency. Some progress is observed where steps have been taken to strengthen recording and disclosure practices, including efforts to publish information and statistics on internal investigations and related proceedings and the public availability of disciplinary sanctions through an electronic system, as well as reported reforms to disciplinary procedures. At the same time, GRECO recommended streamlining complaint intake and publishing anonymised statistics on corruption- and ethics-related misconduct. Shortcomings in corruption-related statistics, the need to strengthen or revise disciplinary regimes, and concerns regarding the independence, resources and oversight of complaint bodies remain key issues.

Selected Good practice from the 5th Round

Corruption prevention in central government (including top executive functions)

Regulation of integrity requirements for political advisors – Cyprus

Law No. 20(I)/2024 "On Consultants-Associates of Members of the Government" of 29 February 2024 regulates the employment and legal status of political advisors. It establishes the binding nature of the Code of Conduct, the violation of which is considered a breach of the employment contract and may lead to its termination and introduces conflicts of interest obligations. The Code of Conduct for Consultants-Associates of Members of the Government was adopted in 2024. It contains provisions on, inter alia, the duty of confidentiality, conflicts of interest, gifts and the acceptance of hospitality. Finally, Law No. 137(I)/2024 "On Certain Officials and Certain Publicly Exposed Persons of the Republic of Cyprus", adopted on 11 July 2024 extends financial disclosure obligations to consultants-associates hired at the discretion of the Government to give advice. The register of consultants-associates, as well as the list of their functions, are now published on the website of the Presidency.

E-platform for public consultation – Cyprus

In 2024, Cyprus launched a centralised e-consultation platform as a single-entry point of public consultation, replacing fragmented publication across ministerial websites. Accompanied by revised practical guidance, the framework sets minimum consultation standards of a four-week duration (including early stakeholder identification), assigns consultation co-ordinators in each ministry/service, and provides for technical support, training and central monitoring by the Directorate-General for Growth. It also encourages yearly evaluation of the effectiveness of consultations taking into account various factors, including the number and responsiveness of the contributions received from stakeholders, the means and tools used in the whole process and the extent to which the consultations helped to clarify the policy pursued by the legislation under consideration.

Transparency of the law-making process – Germany

On 6 March 2024, the Federal Cabinet adopted amendments to the Joint Rules of Procedure of the Federal Ministries introducing an executive footprint. Under the new rules, ministries must indicate the extent to which representatives of special interests and third parties commissioned by federal ministries have made a significant contribution to the content of legislative proposals, including at stages preceding the formal launching of consultations.

Confidential counselling for members of the Government – Portugal

The Transparency Unit of the newly established General Secretariat of the Government (GSG) provides confidential advice to members of the Government and their cabinet members. The Transparency Unit collects statistical data on such advice with the help of software for registering requests for advice and consolidating statistics.

Civil society involvement in transparency oversight – Spain

A Transparency and Good Governance Commission was created as an advisory and consultative body within the Council for Transparency and Good Governance, which is responsible for overseeing access-to-information and transparency rules. This commission includes representatives of civil society, which was welcomed by GRECO as a good practice for reinforcing independent oversight of the implementation of access-to-information, transparency and good-governance rules.

Corruption prevention in law enforcement agencies

Recruitment process and integrity checks – Iceland

Since 2024, recruitments for nearly all police vacancies are now carried out through *ad hoc* selection committees, usually consisting of three members who conduct merit-based assessments of candidates and provide a recommendation for appointment, which, as a rule, is being followed. The Integrity Review Policy Document has been implemented by the National Commissioner for the Police and is applied in the recruitment of officers and staff, as well as in regular integrity checks.

Transparency of donations and sponsorship – Romania

In the context of efforts to enhance transparency and accountability, the Romanian Gendarmerie established a dedicated webpage providing publicly accessible information on donations and sponsorships received by its constituent structures.

Integrity training and women's representation in the Police Force – Slovak Republic

Integrity-related training within the Police Force was significantly reinforced. The authorities produced a detailed explanatory guide on the Police Code of Ethics, which is systematically used in basic post-secondary vocational training and education for police cadets. In addition, a new anti-corruption training package was developed and attended by a large number of serving police officers. These measures were complemented by sustained efforts to increase the representation of women within the Police Force, including in managerial positions, thereby promoting gender balance and diversity and strengthening integrity.

Integrity risk management – Spain

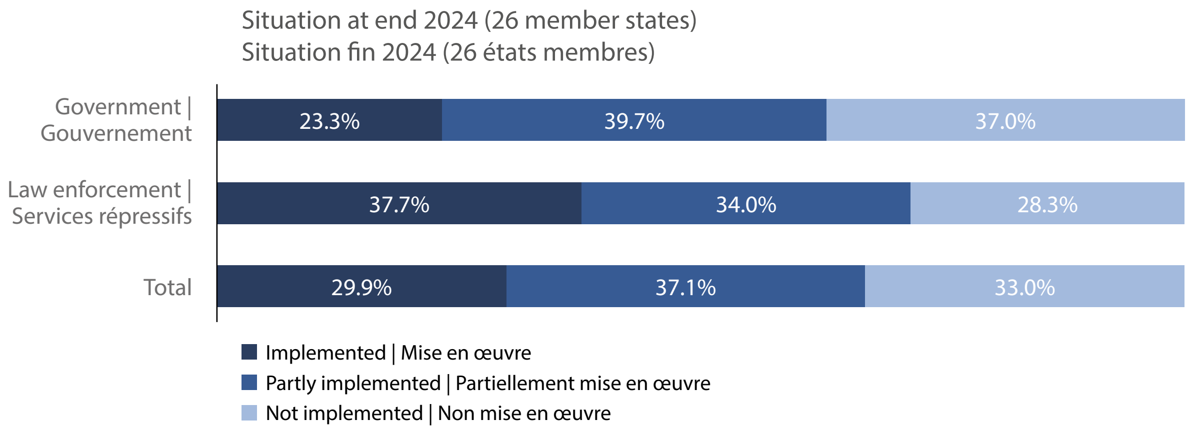
The police and especially the Civil Guard have introducing proactive risk analyses for staff. In the police, the Internal Affairs Unit conducts preventive risk assessments of corruption-prone areas and carries out strategic surveillance to detect and investigate irregular conduct. In the Civil Guard, an Integrity System was adopted, and a Professional Ethics Action Plan is awaiting approval. These instruments introduce proactive risk analysis across key operational areas, with risk assessment maps and surveys, for a structured evaluation of corruption vulnerabilities. Structured training initiatives, periodic risk evaluations and oversight mechanisms were also introduced.

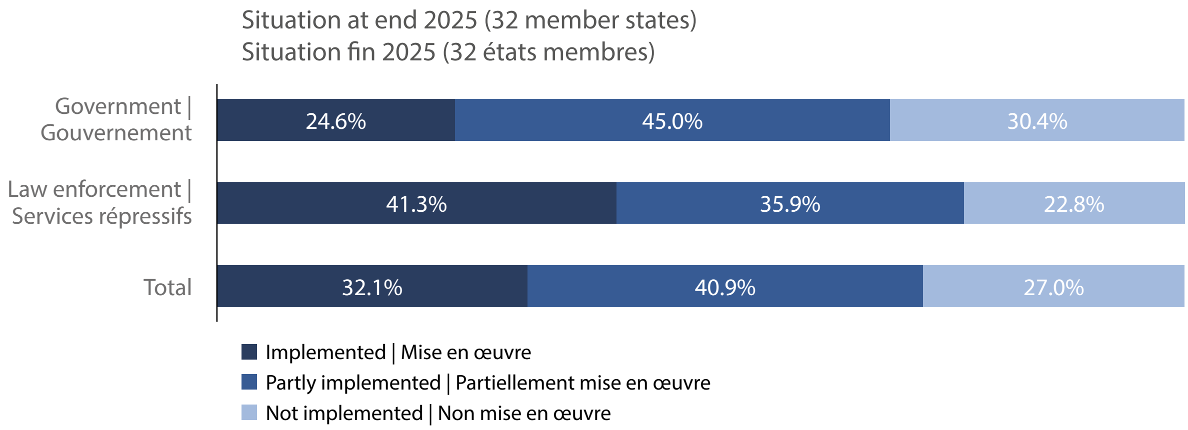
Oversight of police misconduct – United Kingdom

In 2023, the National Crime Agency (NCA) amended the Discipline and Misconduct policy to codify the guidance of the Advisory, Conciliation and Arbitration Service into the Human Resources Policy document. The new policy defines the types of violations and sets out steps to be taken in case of allegations of a criminal nature. It also establishes the reporting procedures and channels, determines the roles of departments and units responsible in disciplinary investigations and proceedings, the procedure for conducting disciplinary panels, and defines sanctions which can be applied for established violations. In addition, the NCA launched a new Confidential Reporting Tool for staff, allowing officers to report misconduct and corruption anonymously.

Figure 2 – Implementation of 5th Round recommendations by GRECO member states 2024-2025

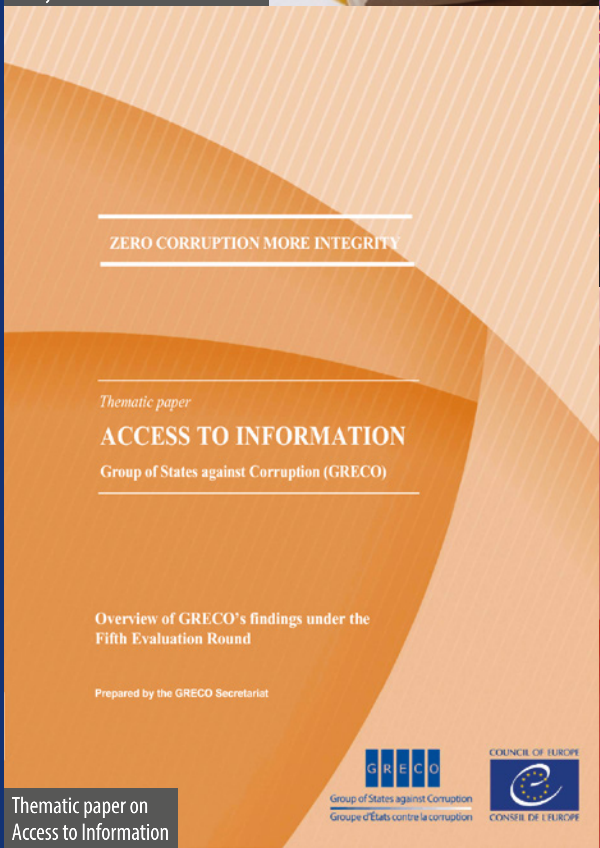
Readers should bear in mind that the member states are at different stages of GRECO's procedure for the round and that the duration of a monitoring procedure varies - from the baseline evaluation report through the compliance procedure until the closing of the round in respect of each state. The statistics take account of all compliance reports made public by the end of 2024 or 2025, respectively[2].





2. At end 2025, Belgium, Croatia, Denmark, France, Germany, Malta, the Netherlands, Poland, the Slovak Republic, Slovenia and Spain were considered not in sufficient compliance with GRECO's 5th Round recommendations (application of Rule 32 revised).

Study on the 5th Evaluation Round



Thematic paper on
Access to Information

Thematic paper on Whistleblower
Protection in Law Enforcement

Launch of the study on the 5th Evaluation Round

ODIHR/PACE study visit for the National Assembly of Armenia

THEMATIC PAPERS

Access to information

On the International Day for Universal Access to Information (28 September), GRECO published a thematic paper on access to official information.

The paper provides an overview of GRECO's approach in the 5th Evaluation Round, which focuses on preventing corruption and promoting integrity in central governments and law enforcement agencies.

GRECO has consistently highlighted access to official information as a fundamental mechanism for ensuring transparency and accountability. Findings from GRECO's 5th Round evaluation reports point to recurring obstacles, including delays in providing information or processing access-to-information requests, lack of proactive transparency, overuse of exceptions and restrictions and low public awareness of the right to access official documents.

GRECO's recommendations have focused on adopting access-to-information legislation or, where such frameworks already exist, reviewing them to broaden the scope of publicly available information; enshrining and effectively implementing the principle of proactive transparency; establishing independent oversight mechanisms; registers of access-to-information requests; and limiting restrictions and exemptions to the minimum necessary. GRECO has also recommended awareness-raising and training for officials on freedom of information laws, and has invited member States that have not yet done so to accede to the Council of Europe Convention on Access to Official Documents.

Whistleblower protection in law enforcement

The Council of Europe has pioneered high standards of whistleblower protection, recognising the value of whistleblowing in deterring and preventing wrongdoing, as well as in strengthening democratic accountability and transparency. On Human Rights Day (10 December), GRECO published a thematic paper on whistleblower protection in law enforcement, providing an overview of its approach to whistleblower protection in the framework of the 5th Evaluation Round.

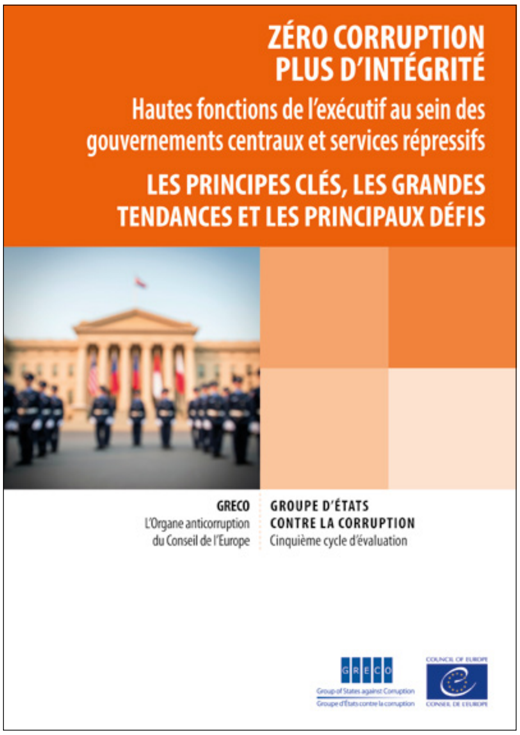
GRECO has consistently emphasised that effective whistleblower protection is essential for transparency, accountability and integrity, including in law enforcement, where it helps counter informal "codes of silence". GRECO's recommendations in the 5th Evaluation Round have focused on strengthening legislation, procedures and enforcement; ensuring accessible and well-known internal and external reporting channels; protecting confidentiality and anonymity; preventing all forms of retaliation; establishing independent oversight and impartial investigation mechanisms; providing regular training at all levels; and collecting and monitoring relevant data.

GRECO has emphasised that effective procedures and organisational arrangements should be in place to support persons reporting wrongdoing, in line with Recommendation CM/Rec(2014)7 on the protection of whistleblowers. In addition to recommendations, GRECO has highlighted a number of emerging good practices across member States. These include clear internal reporting procedures and trusted contact points; strong safeguards to protect confidentiality and prevent retaliation, including a reverse burden of proof in judicial proceedings; and independent external oversight bodies or dedicated whistleblower authorities. Other notable measures include access to confidential advice and legal support, as well as regular awareness-raising, training and periodic evaluation of the effectiveness of national protection frameworks.

FEATURED ARTICLE

Key Principles, Trends and Challenges in GRECO's 5th Evaluation Round – Top executive functions in central governments and law enforcement agencies – Study Highlights

This study provides a comprehensive analysis of progress achieved and remaining challenges identified in GRECO's 5th Evaluation Round, which focuses on promoting integrity and preventing corruption within the top executive functions (PTEFs) of central governments and law enforcement agencies (LEAs).[3]



Drawing on evaluation and compliance reports adopted under GRECO's 5th Evaluation Round, the study highlights key reform trends and identifies priority areas for further action, offering valuable insights for policy makers, practitioners and civil society.

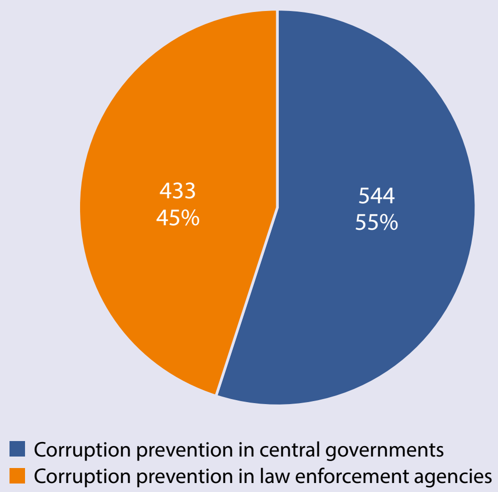
Evaluation reports have been adopted for 46 of GRECO's 48 member states, while Ukraine and Kazakhstan are yet to be evaluated. In addition, 36 member states have already entered the compliance procedure, which remains ongoing for most evaluated countries. The analysis incorporates findings from 51 compliance reports, providing a solid basis for assessing the implementation of GRECO's recommendations and identifying systemic challenges.

Despite differences in mandate and structure, both PTEFs and LEAs exercise significant public power. Persons with top executive functions are expected to demonstrate impeccable conduct and provide leadership in upholding integrity standards. Law enforcement officials, for their part, are required to adhere to the highest anti-corruption standards while exercising powers that compel compliance with the law.

Although public trust in law enforcement has generally improved across member states, confidence in political leadership often remains comparatively low. While public perceptions do not necessarily reflect the actual extent of corruption, levels of trust can indicate citizens' willingness to co-operate with leaders and institutions in efforts to prevent and address corruption, as well as serve as indicator of a country's governance quality and social stability.

3. The full study is available at: www.coe.int/greco.

Recommendations per category



Strengthening integrity within the highest executive levels and law enforcement structures is essential for safeguarding democratic legitimacy and maintaining public confidence in public institutions.

Through this evaluation round and its related monitoring activities, GRECO aims not only to assess compliance but also to raise awareness among its members and encourage a more proactive and strategic approach to promoting integrity and combating corruption.

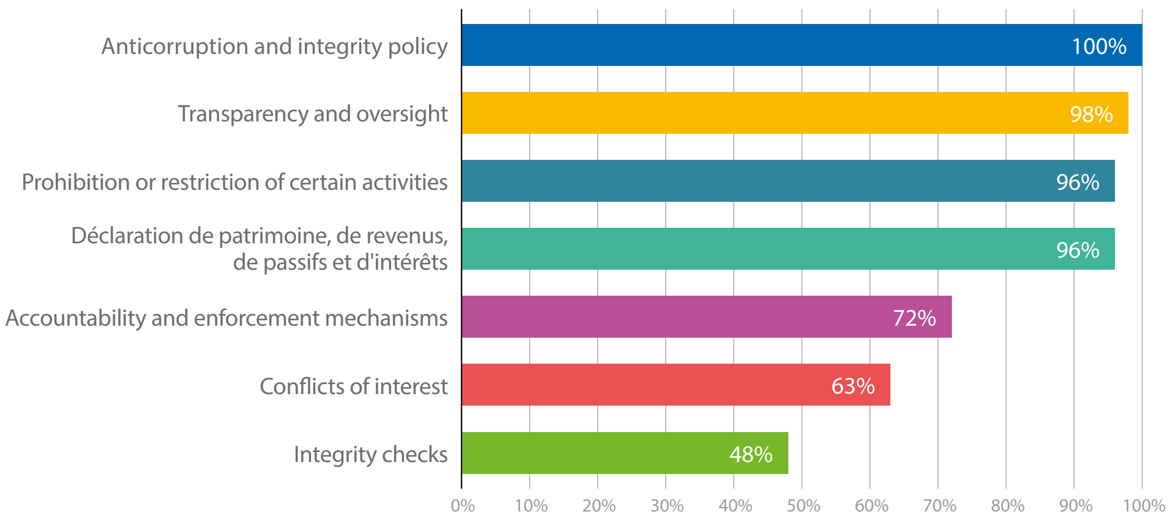
The implementation of GRECO's recommendations has led to a wide range of positive initiatives and improvements across member countries, which are documented in this report.

Persons entrusted with top executive functions in central governments

As regards top executives in central governments, almost all evaluated countries received recommendations concerning anti-corruption and integrity policies, transparency and oversight of the activities of central governments, prohibition or restriction of certain activities and declarations of assets, interests and liabilities.

A challenge in the 5th Evaluation Round was determining which officials should be considered as PTEF, given the diversity of constitutional and institutional arrangements across member states. GRECO addressed this by specifying, in each evaluation report, the scope of its assessment. In general, PTEFs included ministers, their deputies or state secretaries, heads of state where they actively and regularly participate in the development and/or the execution of governmental functions or advises the government in such functions, as well as heads of ministerial cabinets and senior political advisers participating, influencing or supporting decision-making processes.

PTEFs: percent of countries receiving at least one recommendation per area



Distribution of recommendations issued for PTEFs per topic

More than one third of recommendations issued in respect of PTEFs (37%) have remained unimplemented, indicating significant gaps and challenges in this process. 41% of recommendations were partly implemented, suggesting that while some efforts were underway, they were incomplete or lacked full enforcement. Only 22% have been fully implemented, showing that comprehensive reforms are still lacking across most categories.

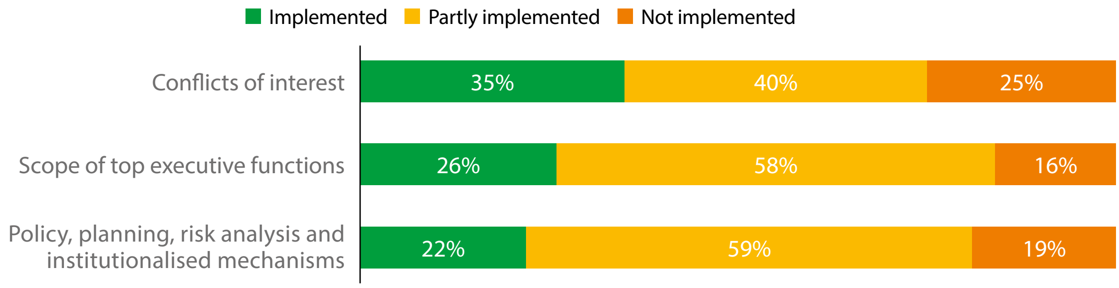
Structural factors partly explain these difficulties. It remains difficult for many countries to establish integrity checks for top government officials, partly because of the tradition of direct and discretionary appointments to political positions. Mobility of top executives to the private sector is another sensitive area, with the duration of restrictions and appropriate sanctions for breaches of post-employment rules being the thorniest issues. Much remains to be done to ensure thorough legal regulation of lobbying activities in line with relevant standards (for example, Recommendation CM/ Rec(2017)2 on the legal regulation of lobbying activities in the context of public decision-making). Last but not least, the substantive and systematic verification of asset declarations requires the establishment of institutional mechanisms with adequate human, budgetary and technical resources, and further efforts are needed to ensure steady progress in this area.

The following areas show some level of effort but remain relatively weak:

- non-criminal enforcement mechanisms,
- declaration requirements,
- control mechanisms,

- transparency of the law-making process,
- criminal proceedings and immunities,
- access to information,
- gifts.

Persons with top executive functions – Best progress achieved



Some progress has nevertheless been observed. A number of positive developments regarding the reporting and management of conflicts of interest by PTEFs have been acknowledged by GRECO. Concerning the recommendations on the scope of top executive functions, some progress can be noted with regard to a better and more transparent regulation of the status of political advisors, ensuring that this category of PTEFs is subject to integrity rules. Increasingly useful steps are being taken to develop targeted strategies or action plans for central governments based on an assessment of the integrity risks specific to this category.

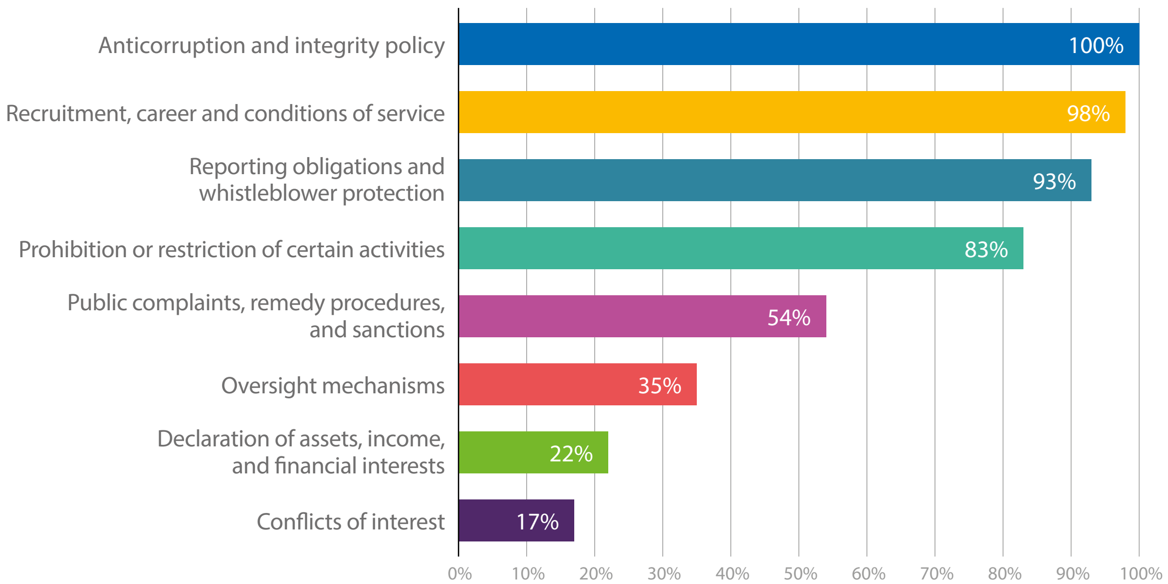
Also, the following areas have shown relatively moderate progress but continue to require further efforts:

- ethical principles and rules of conduct,
- advice, training and awareness-raising.

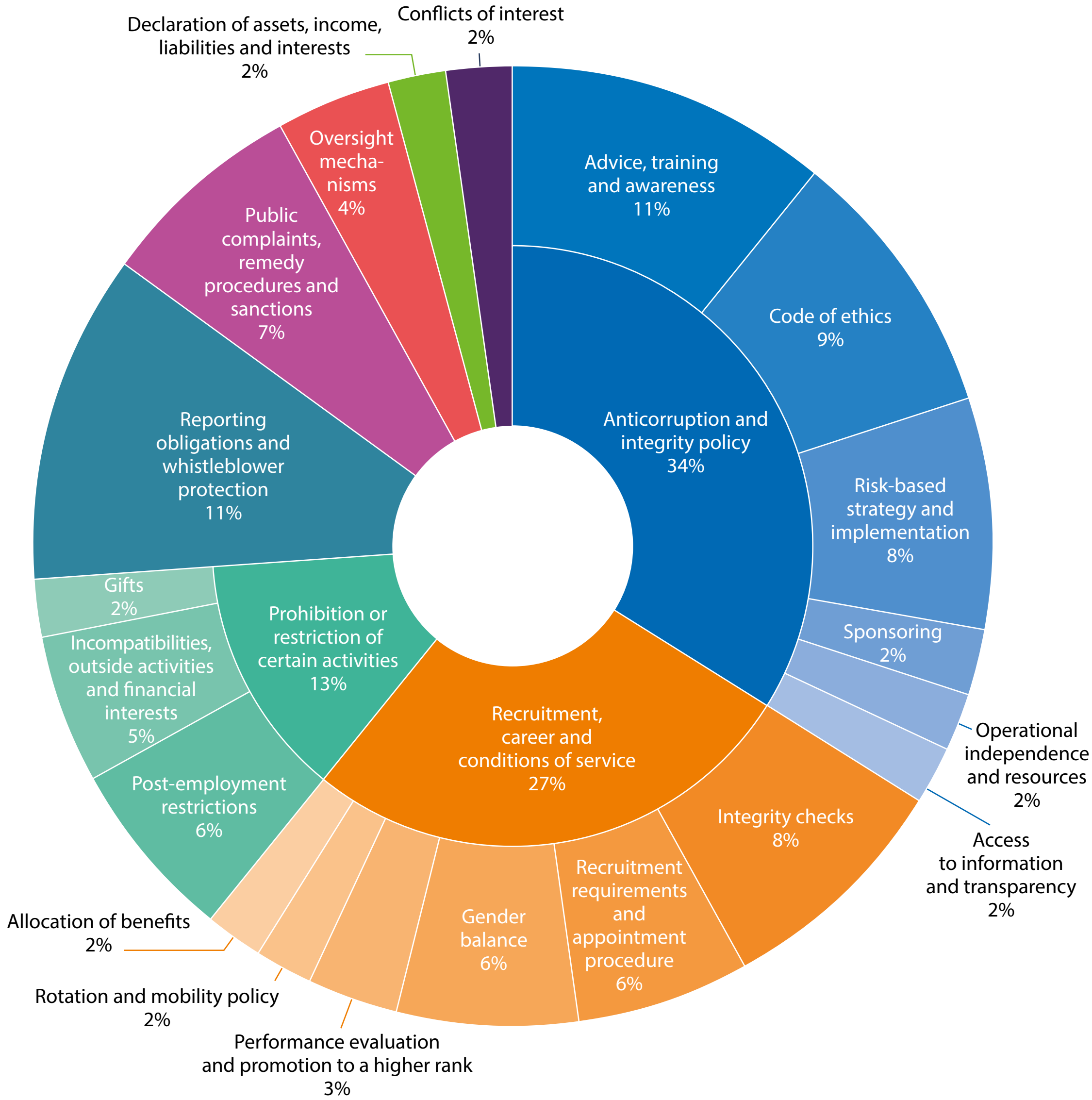
Law enforcement agencies

With regard to law enforcement agencies, all or almost all evaluated countries received recommendations in the areas of anti-corruption and integrity policy; recruitment, career and conditions of service; prohibition or restriction of certain activities, as well as reporting obligations and whistleblower protection.

LEAs: percent of countries receiving at least one recommendation per area



Distribution of recommendations issued for LEAs per topic



Implementation patterns in this sector appear more positive overall. More than one third of recommendations issued in respect of LEAs (35%) have been fully implemented, and 37% partly implemented, while only 28% of recommendations remain unimplemented. Compared with PTEFs, this suggests more consistent progress in strengthening integrity frameworks within law enforcement institutions.

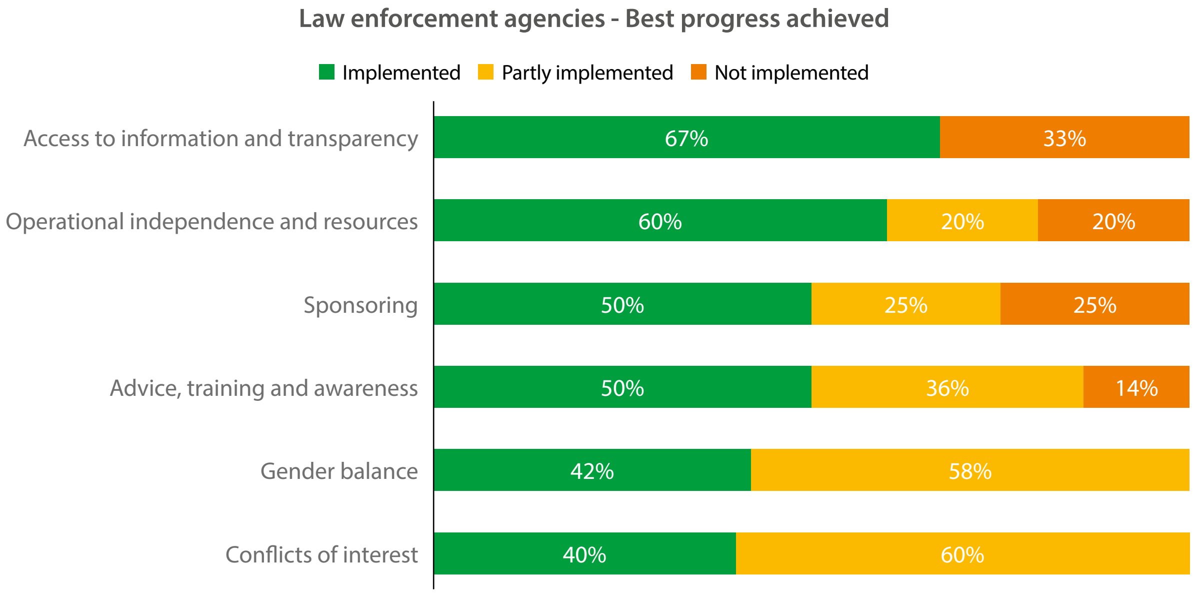
GRECO's recommendations to LEAs cover 20 thematic areas. Only a limited number – six areas – have high rates of non-compliance (between 40% and 63%). This is less than one third, whereas more than two thirds of the areas with recommendations for PTEFs show high rates of non-compliance (12 of 17 areas). Eight of the 20 areas have low rates of non-compliance (20% or less), showing that tangible results have been achieved. The proportion of areas with low rates of non-compliance is thus much higher than for PTEFs (two out of 17 areas).

A number of issues relating to the recruitment and career of law enforcement personnel remain relatively problematic. While some integrity checks are carried out at the time of recruitment, more decisive steps are needed to introduce such checks on a regular basis throughout the career of each staff member. In addition, the principles of transparent and merit-based appointments have been difficult to implement, particularly with regard to the top management of law enforcement agencies. Limited progress has been made in establishing institutional systems of regular rotation, especially in the sectors most vulnerable to corruption risks. Finally, significant efforts are needed to introduce financial disclosure requirements, in particular for top managers and officers working in corruption-prone areas (e.g. procurement).

The following areas show some modest results but remain relatively weak:

- incompatibilities, outside activities and financial interests,
- post-employment restrictions.

However, 15 out of 20 areas show a compliance rate of more than 30%, which is considerably higher than the 3 out of 17 areas for PTEFs. The maximum compliance rate is quite high (67%). This is much higher than the maximum observed for recommendations to PTEFs (40%). Only two out of 20 areas have a rather low compliance rate (20% or less). This corresponds to one tenth, whereas it is more than one third for PTEFs recommendations (six of the 17 areas). Lastly, two areas have a zero non-compliance rate. This means that all the recommendations have been implemented either fully or partly.



At the same time, a number of positive developments have been recorded. Law enforcement agencies have improved communication practices and proactive disclosure of information of public interest. Serious efforts have been made to allocate more resources, to improve the operational independence of the police and to make their sponsoring more transparent. This is closely linked to the positive developments noted in the monitoring of conflicts of interest. Much work has been done to develop integrity training in law enforcement agencies. A number of good practices have emerged to improve gender balance in the police.

The following areas show moderate progress, but more resolute action is still needed:

- code of ethics,
- risk-based anti-corruption strategy and implementation,
- gifts,
- reporting obligations and whistleblower protection,
- performance evaluation and promotion to a higher rank,
- allocation of allowances, bonuses and other benefits.

Similar and divergent trends

The recommendations made so far to the two groups in the countries evaluated show, with a few exceptions, mostly similar trends. There are many similarities in the number of recommendations made to central governments and to law enforcement agencies in the category of codes of conduct, training and confidential counselling, and post-employment restrictions - both groups should focus equally on targeted measures in these areas. In terms of anti-corruption strategy, both groups should work to streamline their policies based on the risk analysis of their respective sectors. However, as the proportion of these recommendations shows, this area has received particular attention with regard to PTEFs, notably because a targeted anti-corruption policy and risk-assessment specific to this group was lacking. Similarly, GRECO has addressed more recommendations to PTEFs than to LEAs in the areas of conflicts of interest (including financial declarations), gifts, and access to information; this is due to their central decision-making responsibilities, access to privileged information, ties to private sector interests and a more relaxed approach to recruitment and incompatibilities rules for this category of persons. There is a slight difference in relation to integrity checks, with more recommendations issued to LEAs in this area, which also refer, inter alia, to vetting and re-vetting which are crucial for law enforcement.

The way forward

The 5th Evaluation Round highlights both meaningful progress and persistent challenges in preventing corruption in central governments and law enforcement agencies. Strengthening integrity in these key institutions remains essential for safeguarding democratic governance and maintaining public trust.

Effective corruption prevention requires transparent decision-making, robust legal and institutional frameworks, strong oversight and the development of a genuine culture of integrity. Member states must invest in both preventive measures and robust mechanisms for detecting and addressing misconduct.

As the compliance process under the 5th Evaluation Round is still ongoing, this study does not present final conclusions. Rather, it offers mid-term observations intended to provide useful indications of areas that would benefit from a renewed intensification of implementation efforts, as well as areas where promising examples of good practice can already be identified.

The study confirms that GRECO monitoring remains an important driver of reform. However, sustained political commitment, stronger institutional ownership and continued follow-up through compliance procedures will be necessary to ensure that recommended reforms are fully implemented and that progress achieved is consolidated. GRECO will continue to support its member states in this vital endeavour, which contributes to the promotion of transparent, accountable and effective governance.

FRAMEWORK FOR GRECO'S ONGOING WORK

Council of Europe anti-corruption standards

The three unique treaties developed by the Council of Europe deal with corruption from the point of view of criminal, civil and administrative law. Corruption is seen not only as a threat to international business and financial interests, but to the values of democracy, human rights and the rule of law that are upheld by the Council of Europe. The Criminal Law Convention on Corruption (ETS No. 173) sets out common standards for corruption offences – among others, the establishment of criminal offences for active and passive bribery (as well as aiding and abetting in such offences) of domestic public officials, domestic public assemblies, foreign public officials, foreign public assemblies, members of international parliamentary assemblies and judges and officials of international courts; for active and passive bribery in the private sector and for trading in influence. Parties to the convention are required to provide for corporate liability, the protection of collaborators of justice and witnesses, and to establish in respect of the above-mentioned offences effective, proportionate and dissuasive sanctions. An Additional Protocol to ETS No. 173 (ETS No. 191) requires the establishment of criminal offences for active and passive bribery of domestic and foreign arbitrators and jurors.

The Civil Law Convention on Corruption (ETS No. 174) deals with compensation for damage, liability, contributory negligence, limitation periods, the validity of contracts, protection of employees, accounts and auditing, the acquisition of evidence, interim measures and international co-operation in relation to corruption defined as "requesting, offering, giving or accepting, directly or indirectly, a bribe or any other undue advantage or prospect thereof, which distorts the proper performance of any duty or behaviour required of the recipient of the bribe, the undue advantage or the prospect thereof".

Accession by any state to either the Criminal Law or Civil Law Convention on Corruption leads automatically to becoming a member of GRECO.[4] On 20 October 2021, at the request of Morocco, the Committee of Ministers of the Council of Europe invited the country to accede to the Criminal and Civil Law Conventions on Corruption – pursuant to that invitation, which is valid for five years, the Council of Ministers of Morocco, chaired by the King, approved both conventions on 19 October 2023. Also at its own request, GRECO's most recent member, Kazakhstan, was invited by the Committee of Ministers of the Council of Europe to accede to the Criminal Law Convention on Corruption on 30 June 2022 – the invitation is valid for five years.

The same evaluation criteria and level of detailed scrutiny by GRECO apply to states whether they have ratified these treaties or not. To date, two GRECO member states have not yet ratified the Criminal Law Convention on Corruption (ETS No. 173). Three members have not yet parties to the Additional Protocol to the Criminal Law Convention on Corruption (ETS No. 191).

It is regrettable that at end 2025, 13 GRECO member states had still not ratified the Civil Law Convention on Corruption (ETS No. 174) despite its importance for the public, private (business) and not-for-profit sectors. The ratification process has not progressed substantially for some years and GRECO might decide in due course to revive that process e.g., through specific measures to promote the Convention. Likewise, while it is not a treaty that GRECO evaluates, it is regrettable that the number of parties to the Council of Europe Convention on the Manipulation of Sports Competitions (CETS No. 215) remains very low (15) even though corruption and integrity cases affecting sports events, and competition-related business more generally, are now frequently and prominently in the public eye.

Council of Europe Treaty Office: https://www.coe.int/en/web/conventions/home

4. The Russian Federation which became a member of GRECO by ratifying the Criminal Law Convention on Corruption (ETS No. 173) in 2006, denounced the convention in 2023 and ceased to be a member of GRECO on 1 July 2023. Belarus which became a member of GRECO by ratifying ETS No. 173 in 2007, denounced the convention in 2024 and ceased to be a member of GRECO on 1 May 2024.

The treaties are complemented by the following legal instruments:

- **Twenty Guiding Principles** for the fight against Corruption (Committee of Ministers Resolution Res(97)24)
- Recommendation on **Codes of Conduct for Public Officials** (including a model code) (Committee of Ministers recommendation to member States No. Rec(2000)10)
- Recommendation on **Common Rules against Corruption in the Funding of Political Parties and Electoral Campaigns** (Committee of Ministers recommendation to member States Rec(2003)4)

Furthermore, the Committee of Ministers has drawn GRECO's attention to anti-corruption components of other legal instruments and advisory texts that it can take into account in its work, for example:

- **Convention on the Manipulation of Sports Competitions** (CETS No. 215)
- Recommendation on the **Protection of Whistleblowers** (Committee of Ministers recommendation to member States CM/Rec(2014)7)
- Consultative Council of European Prosecutors Opinions: **European Norms and Principles concerning Prosecutors** (Rome Charter CCPE Opinion No.9), **Independence, accountability and ethics of prosecutors** (CCPE Opinion No. 13), **The role of prosecutors in fighting corruption and related economic and financial crime** (CCPE Opinion No. 14), **Councils of Prosecutors as key bodies of prosecutorial independence** (CCPE Opinion No. 18)
- Consultative Council of European Judges Opinions: **The Position of the Judiciary and its Relations with other Powers of State in a Modern Democracy** (CCJE Opinion No. 18), **Preventing corruption among judges** (CCJE Opinion No. 21), **The evolution of the Councils for the Judiciary and their role in independent and impartial judicial systems** (CCJE Opinion No. 24), **Freedom of expression of judges** (CCJE Opinion No. 25); **Disciplinary liability of judges** (CCJE Opinion No.27); **The importance of judicial well-being for the delivery of justice** (CCJE Opinion No. 28)
- Recommendation on **the Legal Regulation of Lobbying Activities in the Context of Public Decision-making** (Committee of Ministers recommendation to member States CM/Rec(2017)2)

Methodology: evaluation, compliance and other aspects

Evaluation

GRECO evaluation procedures involve the collection of information through questionnaire(s), on-site country visits enabling evaluation teams to solicit further information during high-level discussions with domestic key players and practitioners, and the drafting of evaluation reports. These reports provide an in-depth analysis of the situation in each country and are examined and adopted by GRECO during its plenary meetings. Evaluation reports state whether legislation and practice comply with the provisions under scrutiny and address recommendations to member states when action is required. The authorities are asked to report subsequently on the measures taken, which are then assessed by GRECO under a specific compliance procedure.

Compliance

In the compliance procedure, GRECO monitors the implementation of the recommendations it has issued to the country in the evaluation report. The assessment of whether a recommendation has been implemented satisfactorily, partly or has not been implemented is based on a situation report, accompanied by supporting documents, submitted by the member under scrutiny. During the compliance procedure GRECO re-examines the concrete progress made in implementing the outstanding recommendations. Compliance reports adopted by GRECO also contain an overall conclusion on the implementation of all the recommendations, the purpose of which is to decide whether to close or continue the compliance procedure in respect of a particular member. For the 5th Evaluation Round, if at least two-thirds of the recommendations have been implemented satisfactorily or dealt with in a satisfactory manner, GRECO shall close the compliance procedure. The Rules of Procedure of GRECO foresee a procedure, based on a graduated approach, for dealing with members whose response to GRECO's recommendations has been found to be globally unsatisfactory (4th Round) or who have been found not to be in sufficient compliance with GRECO's recommendations (5th Round). These Rules also include a provision allowing GRECO to act on an *ad hoc* basis when an institutional reform, legislative initiative or procedural change by a member state might result in a serious violation by that member of a Council of Europe anti-corruption standard.

Civil society

Civil society organisations, at both national and international level, make a valuable contribution to the fight against corruption and to the broader implementation of Council of Europe standards in this field. GRECO recognises the role of non-governmental actors in promoting transparency, accountability and informed public debate, and engages with them, where appropriate, to enrich its work. Exchanges with civil society help provide complementary perspectives on issues relevant to GRECO's monitoring work.

Engagement with civil society forms part of GRECO's established working methods and evaluation methodology. During on-site evaluation visits, evaluation teams meet a range of relevant stakeholders – including professional associations, academia and media – in order to gather information that complements dialogue with public authorities. Civil society expertise also contributes to the preparation of evaluation rounds and to GRECO's events, training activities and reporting. Through constructive contacts maintained by the Secretariat, this interaction helps raise awareness of GRECO's standards and supports national efforts to implement its recommendations, while fully respecting member States' primary responsibility for anti-corruption reforms.

Gender diversity

Gender diversity is key in the prevention of groupthink and in turn of corruption. Recommendation Rec(2003)3 of the Committee of Ministers of the Council of Europe to members states on balanced participation of women and men in political and public decision making establishes that the representation of either women or men in any decision-making body in political or public life should not fall below 40%.

About a third of the questions contained in GRECO's 5th Round questionnaire are gender related. These include requests for statistics on gender representation in the branches of power under review (i.e. central governments and law enforcement) and for criminal/disciplinary statistics disaggregated by sex. One of the aims is to identify structural imbalances which might potentially lead to, or result from, non-transparent informal networks and decision-making processes. As GRECO has sometimes pointed out in country reports, diversity has the potential of having positive effects on the overall working environment within an institution, making it more representative of the population as a whole.

GRECO has also introduced a gender-focused dimension in its 6th Evaluation Round, integrating gender-related questions and data collection into its assessment. Evaluations will examine, *inter alia* the situation regarding the gender balance in executive and representative bodies in sub-national authorities (including at the leadership level), as policies or regulations that promote balanced representation in decision-making, and gender aspects in integrity and ethics violations. This approach highlights the importance of diversity and fair representation in preventing corruption and strengthening democratic governance at the sub-national level.

GRECO appointed in November 2024 Ms Vita HABJAN BARBORIČ (Commission for the Prevention of Corruption (Slovenia) as its Gender Equality Rapporteur for the 6th Evaluation Round.

Evaluation Rounds[5]

GRECO's monitoring work is organised in rounds. Each has its own thematic scope and makes reference to a range of Council of Europe standard-setting texts of pertinence to the issues examined.

6th Evaluation Round (launched in March 2025)

Preventing corruption and promoting integrity at the sub-national level

System of government at the national and sub-national level and competences of national authorities in promoting integrity and preventing corruption at the sub-national level

- Constitutional and legislative framework, territorial structure and distribution of competencies
- Applicability of national anti-corruption and integrity policies and/or strategies to sub-national authorities
- Implementation of national anti-corruption and integrity legislation by sub-national authorities
- Statistics on corruption offences at subnational level

5. See https://www.coe.int/en/web/greco/evaluations.

Sub-national authorities

- Institutional framework
- Anti-corruption and integrity policies and risk assessment(s)
- Standards of conduct and ethics
- Conflicts of interest
- Incompatibilities, prohibition or restriction of certain activities
- Declarations of assets, income, liabilities and interests
- Transparency, access to information, public participation
- Control mechanisms, oversight and accountability
- Disclosure of corruption and integrity violations, whistleblower protection
- Enforcement and sanctions

5th Evaluation Round (launched in March 2017)

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

Central government (top executive functions)

- System of government and top executive functions
- Anticorruption and integrity policy, regulatory and institutional framework
- Transparency and oversight of executive activities of central government
- Conflicts of interest
- Prohibition or restriction of certain activities
- Declaration of assets, income, liabilities and interests
- Accountability and enforcement mechanisms

Law enforcement agencies

- Organisation and accountability
- Anticorruption and integrity policy
- Recruitment, career and conditions of service
- Conflicts of interest
- Prohibition or restriction of certain activities
- Declaration of assets, income, liabilities and interests
- Oversight and enforcement

4th Evaluation Round (2012-2017)

Prevention of corruption in respect of members of parliament, judges and prosecutors

- Ethical principles and rules of conduct (all)
- Conflicts of interest (all)
- Recruitment, career and conditions of service (judges and prosecutors)
- Transparency of the legislative process (members of parliament)
- Remuneration and economic benefits (members of parliament)
- Prohibition or restriction of certain activities (all)
- Declaration of assets, income, liabilities and interests (all)
- Supervision and enforcement of rules and regulations (all)
- Advice, training and awareness (all)

3rd Evaluation Round (2007-2012)

Theme I: Incriminations

- Essential concepts to be captured in the definition of passive and active bribery offences as well as trading in influence
- Limitation periods

- Jurisdiction
- Special defences

Theme II: Political funding

- Transparency of books and accounts of political parties and election campaigns
- Monitoring of party and campaign funding
- Enforcement of the relevant funding rules

2nd Evaluation Round (2003-2006)

- Identification, seizure and confiscation of corruption proceeds
- Public administration and corruption (auditing systems, conflicts of interest, reporting of corruption and whistle-blower protection)
- Prevention of legal persons being used as shields for corruption
- Fiscal and financial legislation to counter corruption
- Links between corruption, organised crime and money laundering

1st Evaluation Round (2000-2003)

- Independence, specialisation and means available to national bodies engaged in the prevention and fight against corruption
- Extent and scope of immunities from criminal liability.

Members that join GRECO after the close of an evaluation round undergo evaluations on the themes of previous rounds before joining the current one, starting with the first two rounds which are restructured into *Joint 1st and 2nd Round Evaluations*.

Publication and communication

The publication and communication of GRECO's findings and reports constitute an important element of its overall working methods. Member states have established a long-standing practice of authorising publication of reports shortly after adoption, including with a translation into national languages. This practice plays a key role in raising awareness of GRECO's findings among public authorities, civil society and the wider public, thereby fostering national debate and encouraging support for the implementation of GRECO's recommendations.

The release of reports is co-ordinated with the member state concerned and with the Media department of the Council of Europe. Communication through both traditional and social media channels is embedded in GRECO's activities and contributes to the broad dissemination of information across all members. GRECO's monitoring receives considerable media attention[6], further enhancing public understanding of integrity standards and reform expectations. GRECO also issues a Newsletter regularly, and its website is widely consulted.

6. See https://www.coe.int/en/web/greco/greco-in-the-media .

5th EVALUATION ROUND – PARAMETERS

The ongoing 5th Evaluation Round that is devoted to *Corruption prevention and promoting integrity in central governments* (top executive functions) and law enforcement agencies constitutes a logical extension to the 4th Round with its implications for shaping the public's attitudes vis-à-vis their political institutions and democracy in general. Furthermore, while law enforcement authorities form a cornerstone of the fight against corruption, and their integrity is therefore fundamental, experience shows that the specific risk factors involved in the work of law enforcement agencies warrant careful attention.

For the purpose of the 5th Evaluation Round, the term "central government" includes persons who are entrusted with top executive functions at national level (PTEFs). Bearing in mind each country's constitutional set-up,[7] these functions might include those of heads of state, heads of central government, members of central government (e.g., ministers), as well as other political appointees who exercise top executive functions, such as deputy ministers, state secretaries, heads/members of a minister's private office (cabinet ministériel) and senior political officials. This might include political advisors, depending on the system of the country. Where political advisors are not evaluated in their own right, information about their interactions with PTEFs is nevertheless examined. Prior to the evaluation, the member state concerned is requested to submit a comprehensive and precise list of the "top executive functions" exercised by the head of state and by the head of the central government.

As regards Heads of State, GRECO decided (78th Plenary Meeting, December 2017) on the following definition for the 5th Round: "A Head of State would be covered by the 5th Evaluation Round under "central governments (top executive functions)" when s/he actively participates on a regular basis in the development and/or the execution of governmental functions, or advises the government on such functions. These may include determining and implementing policies, enforcing laws, proposing and/or implementing legislation, adopting and implementing by-laws/normative decrees, taking decisions on government expenditure, taking decisions on the appointment of individuals to top executive functions."

Concerning law enforcement agencies, in the interests of providing a streamlined, in-depth assessment, GRECO's evaluation focuses on officials of selected bodies performing core law enforcement functions which are subject to national laws and regulations, that is police services at national level which may include agencies responsible for border control.[8] If a country has multiple police services at national level, the evaluation is limited to two or three main services. GRECO determines prior to the evaluation, on the basis of a reasoned proposal by the member state concerned, which services are to be evaluated.

In terms of the methodology and structure of evaluation reports, GRECO adopts a similar approach to that developed in the 4th Round. The questionnaire, which provides the main grid for evaluation, is divided into two parts: part (A) dealing with central governments (top executive functions) and part (B) dealing with selected law enforcement agencies. The first section of each part serves the purpose of generating fundamental input for obtaining an overall understanding of the system in each country.

Emphasis is put on the effective implementation of existing regulations. It is clear that effective corruption prevention relies to a large extent on the realisation of tangible achievements, and it is therefore crucial for GRECO evaluation teams to receive a maximum of information on practical and organisational arrangements, specific examples and statistics on the application of the law, and training, awareness-raising and other initiatives.

7. In this context, the term "constitutional set-up" is to be understood as meaning a country's constitution, practice and specificities.
8. Administrative customs services and tax authorities are excluded from this evaluation.

6^{th} EVALUATION ROUND – PARAMETERS

In June 2023, GRECO decided to devote its 6th Evaluation Round to Preventing corruption and promoting integrity at the sub-national level. Directing its attention to local and regional authorities constitutes a logical extension to the 2nd, 4th and 5th Evaluation Rounds which covered essential components of central power. Sub-national authorities are responsible for a variety of public services and are an important part of national democracies. Their decisions affect citizens' lives in direct and immediate ways and by virtue of this proximity, they are at least as susceptible to corruption as the central public administration and Government.

GRECO's Working Party established in June 2023 to define the scope and focus of the 6th Evaluation Round, completed its work after two meetings, held in October 2023 and February 2024. In December 2023, the Plenary endorsed the Working Party's proposals regarding the level of sub-national authorities to be evaluated, relevant officials and topics, the evaluation and compliance methodology, as well as relevant standards and texts of reference. In March 2024, the Plenary took the final decisions on the evaluation parameters, modalities and questionnaire for the new 6th Evaluation Round.[9]

The 6th Evaluation Round focuses on sub-national authorities with competence, amongst others, to adopt legislation or regulations; authorise expenditure; take decisions over urban planning, development, and procurement; levy taxes; decide which services are provided and to whom; make decisions on recruitment and remuneration, etc. Bearing in mind each member State's constitutional set-up, the evaluation will cover executive and representative bodies, including elected or politically appointed officeholders who take significant decisions, mainly of executive nature, on behalf of the sub-national authority under evaluation. The evaluation will also cover public officials employed by the evaluated sub-national authorities who are responsible for authorising expenditure, making decisions on urban planning, development and procurement; determining service provision and overseeing recruitment and remuneration.

GRECO's questionnaire[10] is divided into two parts: part A (completed by national authorities) examines the competences, mechanisms and responsibilities related to integrity promotion and corruption prevention at the sub-national level and other contextual factors, part B (completed by the two sub-national authorities) provides an in-depth focus on laws, regulations, procedures, bodies and mechanisms addressing integrity and corruption prevention in the two selected sub-national authorities.

Prior to the evaluation, the GRECO Secretariat, in consultation with the member state concerned, will identify two sub-national authorities, including (i) a capital or, in the absence of agreement, an alternative major city; (ii) a regional or other sub-national authority or, particularly in countries having only one sub-national tier, a municipality (size to be determined). The evaluation includes a five-day on-site visit and interviews with all relevant State (public) stakeholders, as well as relevant non-State actors, including civil society and media.

The evaluation will place strong emphasis on the effective implementation of existing regulations, recognising that successful corruption prevention depends on tangible achievements. Therefore, GRECO evaluation teams require comprehensive information on practical and organisational arrangements, including specific examples and statistics on the application of the law, training programs, awareness-raising efforts and other initiatives to assess real-world impact. The evaluation process will strive to accommodate the constitutional framework of all member States and reflect countries with different systems of government and different relationships between national and sub-national levels by addressing recommendations to the appropriate authorities.

9. See Greco(2024)6 - Sixth Evaluation Round : National delegations, evaluators and on-site visits .
10. See Greco(2024)7 Questionnaire.


Exchange with the Committee of Ministers


Side Event with the Congress


Venice Comission's Plenary Session


Access Info Group's meeting


GRECO President meets with European Commissioner Michael McGrath


Exchange with Civil Society

INTERPOL meeting in the Emirates

UNODC COSP11 meeting

GOVERNING STRUCTURES AND MANAGEMENT

The permanent bodies constituting GRECO are the Plenary, the Bureau and the Statutory Committee. The Statute also provides for *ad hoc* bodies, principally evaluation teams but also working parties.

Plenary and Bureau

GRECO elects a President, Vice-President and Bureau for each new evaluation round. Elections for the 6th Evaluation Round were held in November 2024. The positions of President and Vice-President for the 6th Evaluation Round were taken up respectively in January 2025, by David MEYER (United Kingdom) and António DELICADO (Portugal). The new Bureau is composed of the President, Vice-President and five Bureau members, respectively Alexia KALISPERA (Cyprus), Lise CHIPAULT (France), Panagiota VATIKALOU (Greece), Sorin TĂNASE (Romania) and Olivier GONIN (Switzerland).

The representatives of member states that compose the Plenary are directly involved in the peer review process during the examination and adoption of evaluation and compliance reports. The Plenary also takes final decisions on the focus of GRECO's monitoring, policy and planning.

Statutory Committee - Budget and Programme of Activities

The Statutory Committee is composed of the Permanent Representatives of the member states of the Council of Europe (the Ministers' Deputies) and representatives of the GRECO member states that are not members of the Organisation (in 2025: Kazakhstan and the United States of America). Its principal task is to adopt GRECO's programme and budget which is prepared in line with the approach implemented throughout the Council of Europe and based on priorities presented by the Secretary General and on GRECO's annual programme of activities. On 15 October 2025, the Statutory Committee, presided by Sandy MOSS, Ambassador Extraordinary and Plenipotentiary, Permanent Representative of the United Kingdom to the Council of Europe, approved the Scale of Contributions for 2026, the Budget of the Enlarged Agreement for 2026 as well as its Budget for 2027 on a provisional basis within the framework of the quadrennial Programme for 2024-2027.

Secretariat

The Secretariat headed by Livia STOICA BECHT, Executive Secretary since 1 December 2023, provides support, guidance and technical and legal advice to the countries participating in GRECO's monitoring work and is responsible for the management of the budget and programme of activities, as well as external relations (cf. Appendix 6).

APPENDICES

Appendix 1 – GRECO's Mission

The anti-corruption monitoring body of the Council of Europe has been operational since 1999. It was established as the result of the strong political will of Council of Europe member states to take decisive and enduring measures to counter corruption by ensuring adherence to, and effective implementation of, the Organisation's anti-corruption standards. The mission of its membership, which extends beyond the geographical span of the Council of Europe, is to promote targeted anti-corruption action, awareness of corruption risks and careful consideration and implementation of reforms to remedy shortcomings in national policies, legislation and institutional set-ups.

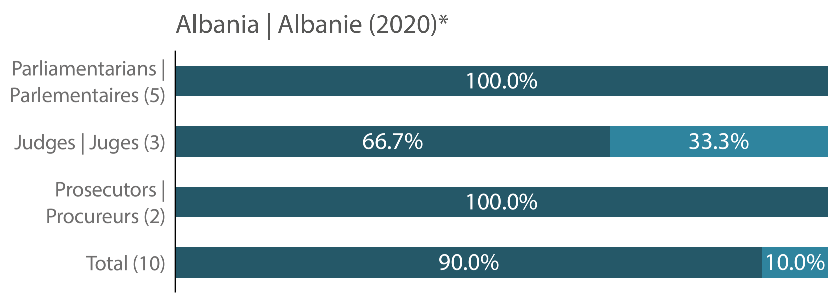
The clear stated political objective of strengthening the capacity of member states to prevent and fight corruption is served by a monitoring model designed to provide each member state with a detailed analysis and set of recommendations that are tailored to the specificities of each country. Subsequent "compliance procedures" serve to verify achievements and actively push for alignment with what has been recommended. Multiple layers of result validation and a high level of process ownership are some of the important features of this model. The dynamics of mutual evaluation and peer pressure continue to be pivotal to GRECO's work.

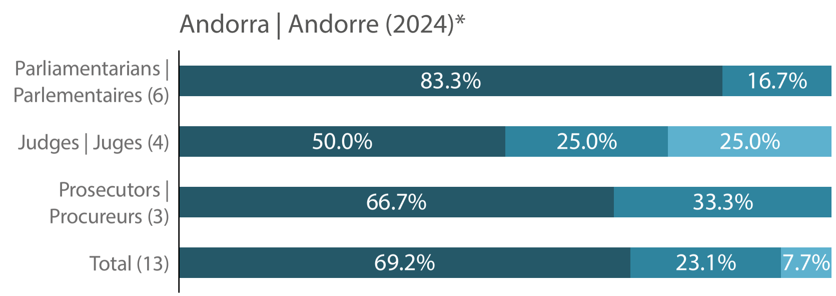
Appendix 2 – Implementation Statistics

The tables presented here offer a visual representation of the state of implementation of GRECO's recommendations in respect of its member states individually. The statistics are not intended to be the basis of any ranking or direct comparison between countries when it comes to compliance with GRECO's recommendations or successful action against corruption. The aim is to provide a snapshot of progress made within GRECO's procedures vis-à-vis each member state. Readers should bear in mind that the member states are at different stages of GRECO's procedure for the respective evaluation rounds and that the duration of a monitoring procedure varies – from the baseline evaluation report through the compliance procedure until the closing of the round in respect of a particular state. The statistics take account of all compliance reports made public by end 2025 and the closing of a round is marked by an *.

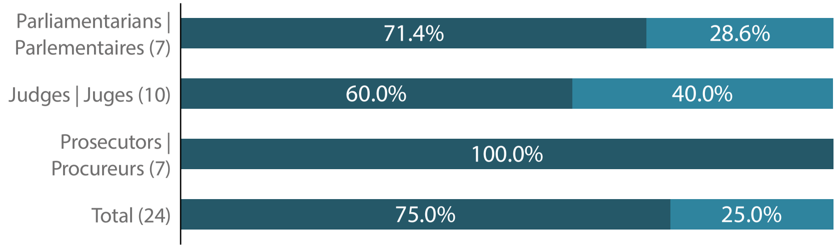
The year indicated is when the most recent published compliance report was adopted. The figures in brackets correspond to the number of recommendations made in respect of each category.

4th Evaluation Round – Prevention of corruption in respect of members of parliament, judges and prosecutors

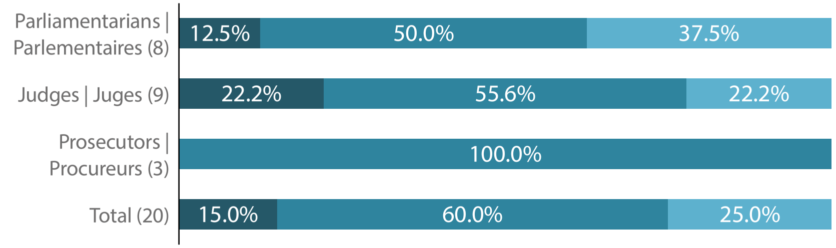




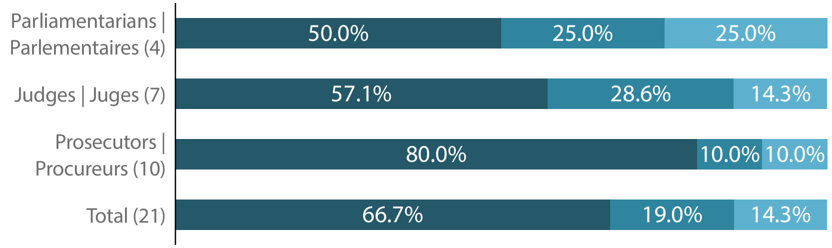
Armenia | Arménie (2024)*



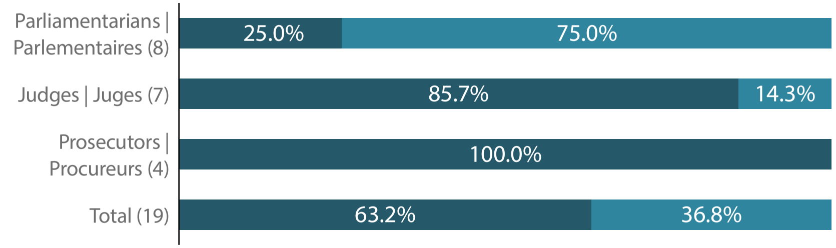
Austria | Autriche (2024)



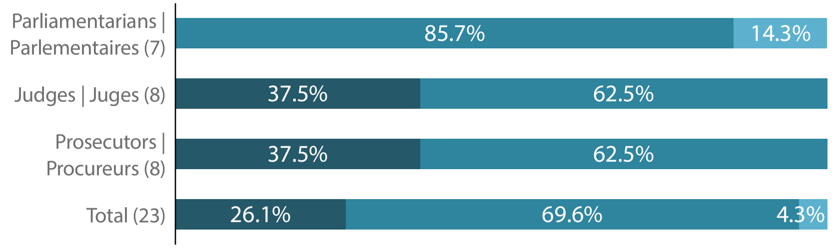
Azerbaijan | Azerbaïdjan (2020)*



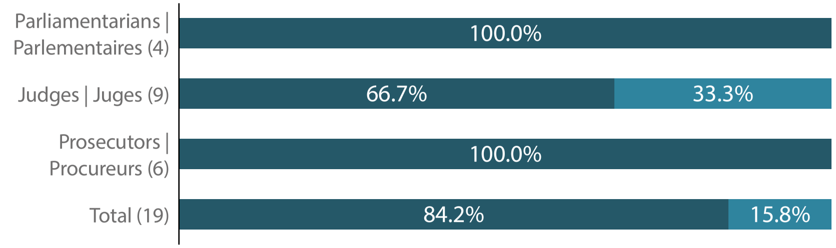
Belgium | Belgique (2025)*



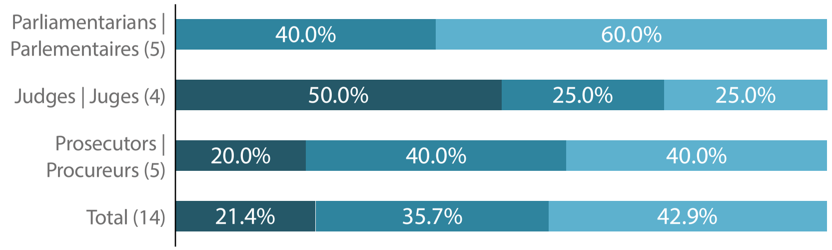
Bosnia and Herzegovina | Bosnie-Herzégovine (2024)



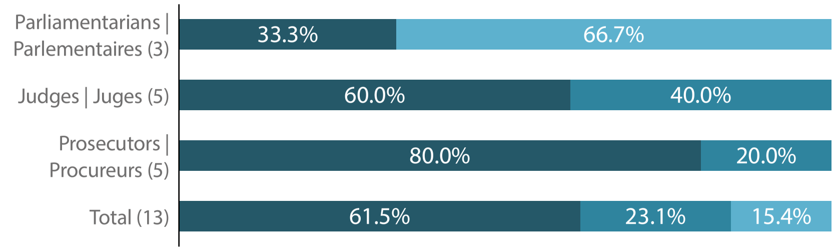
Bulgaria | Bulgarie (2020)*



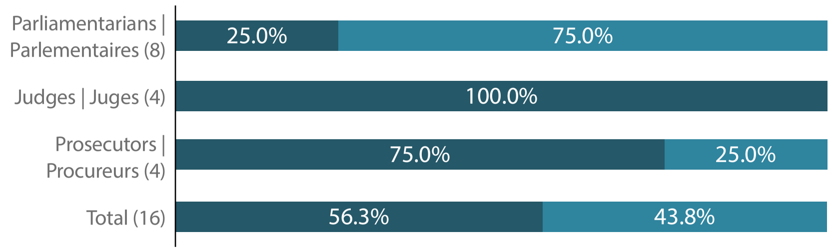
Czechia | Tchéquie (2023)



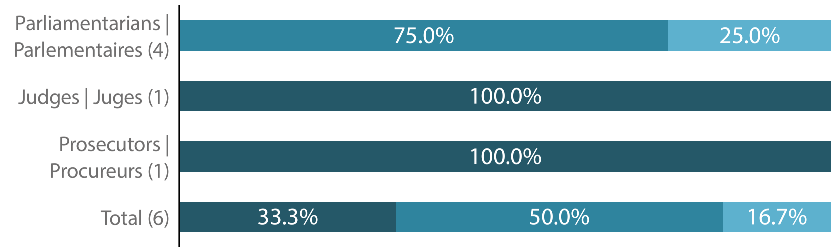
Croatia | Croatie (2022)*



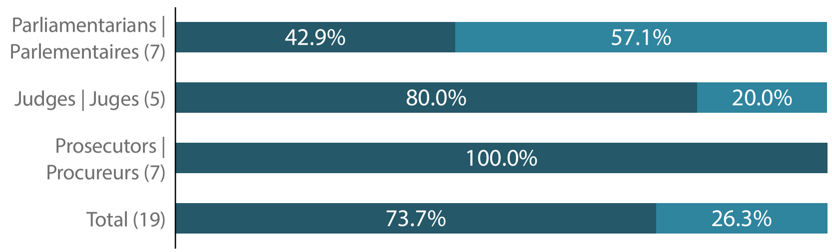
Cyprus | Chypre (2023)*



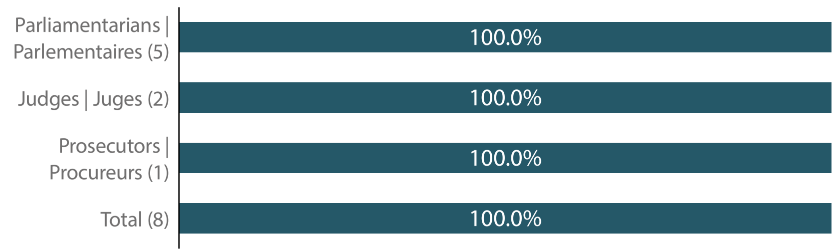
Denmark | Danemark (2024)



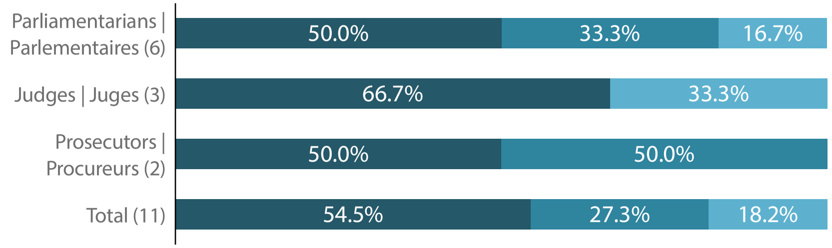
Estonia | Estonie (2017)*



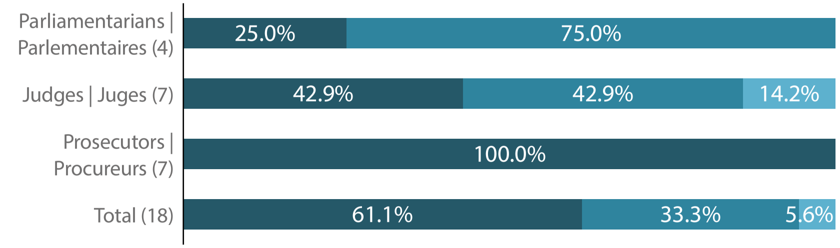
Finland | Finlande (2017)*



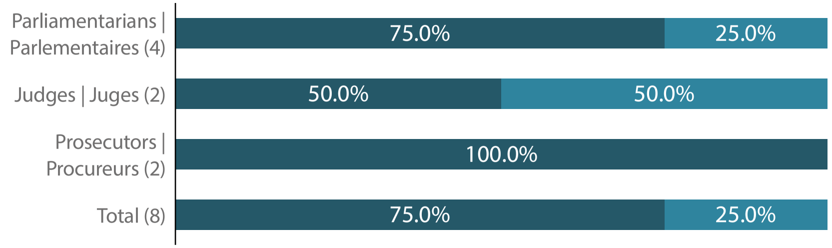
France (2023)*



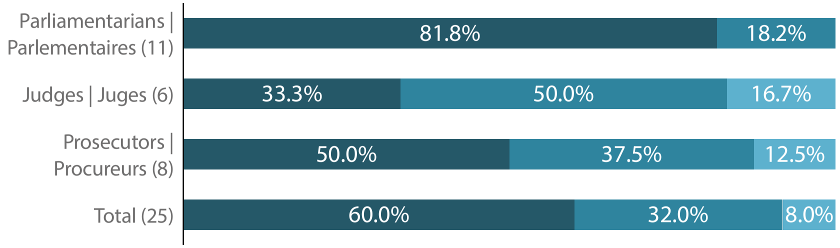
Georgia | Géorgie (2024)*



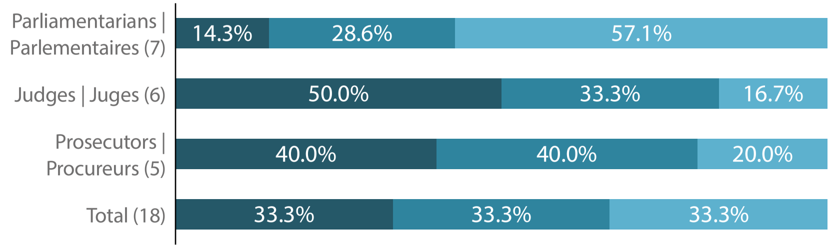
Germany | Allemagne (2024)*



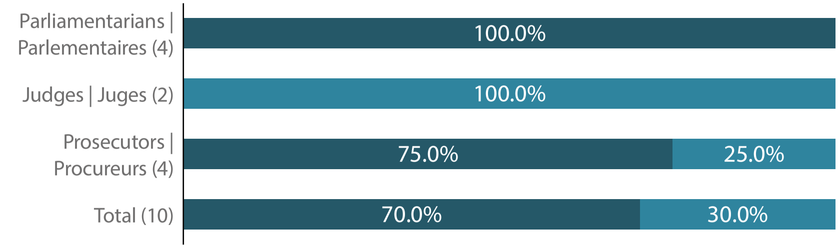
Greece | Grèce (2023)*



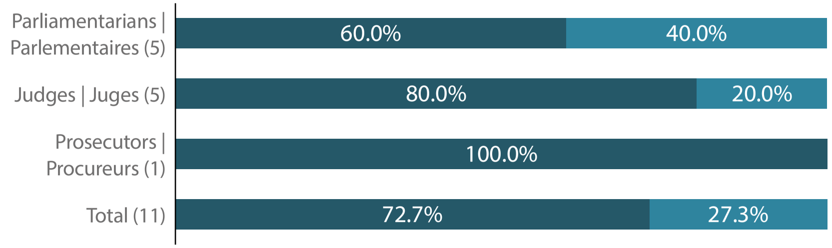
Hungary | Hongrie (2023)



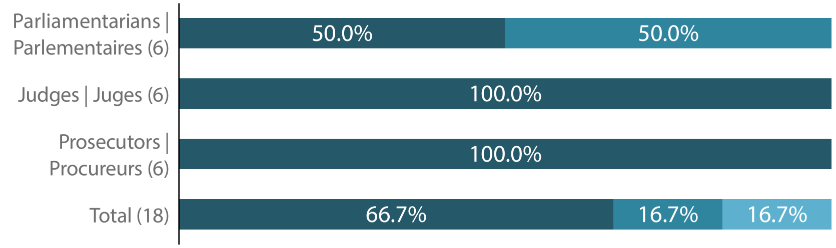
Iceland | Islande (2021)*



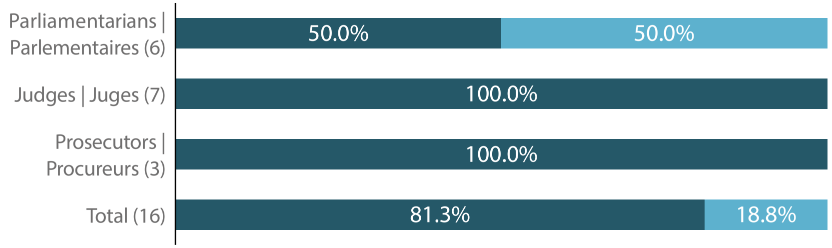
Ireland | Irlande (2025)*



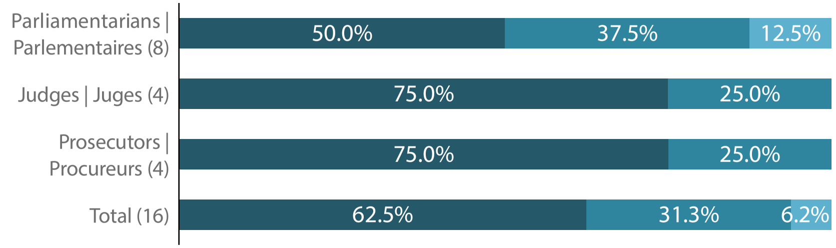
Italy | Italie (2024)*



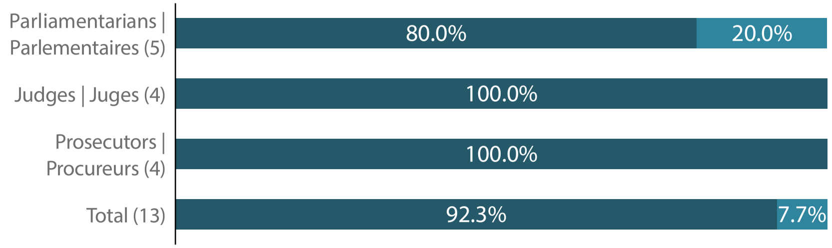
Latvia | Lettonie (2020)*



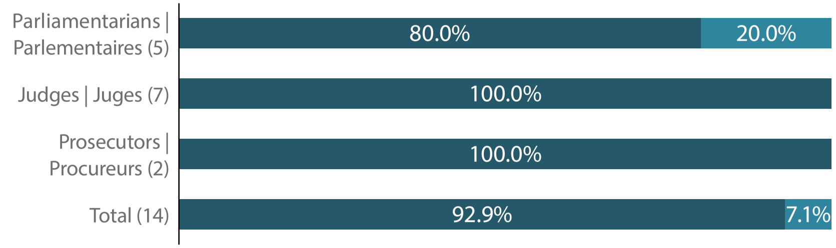
Liechtenstein (2025)



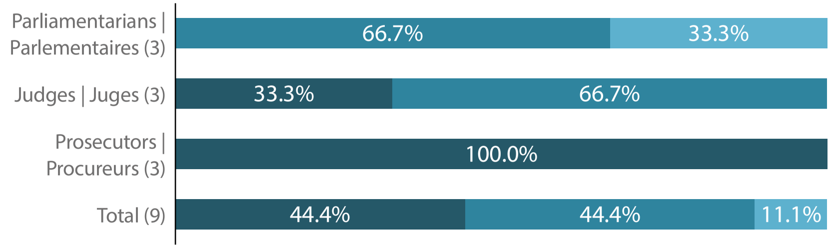
Lithuania | Lituanie (2021)*



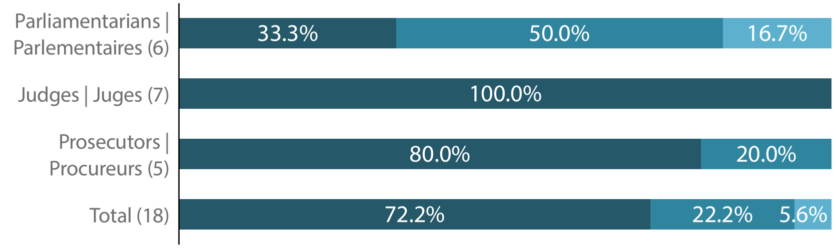
Luxembourg (2023)*



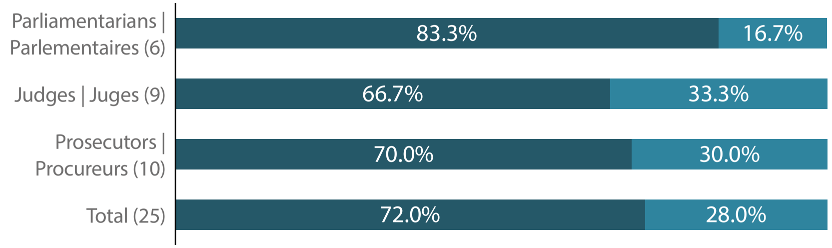
Malta | Malte (2022)*



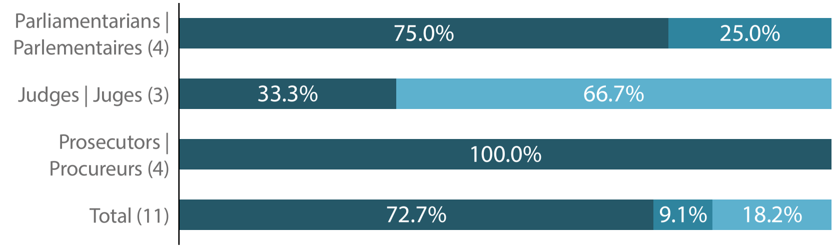
Republic of Moldova | République de Moldova (2024)*



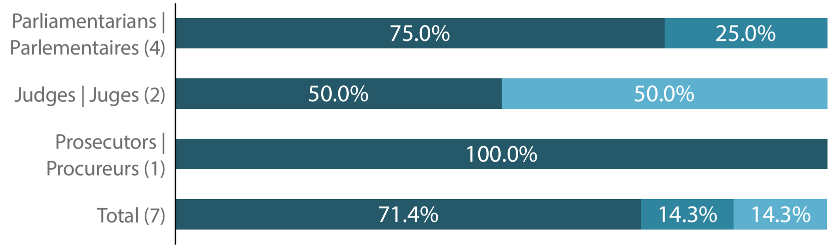
Monaco (2023)*



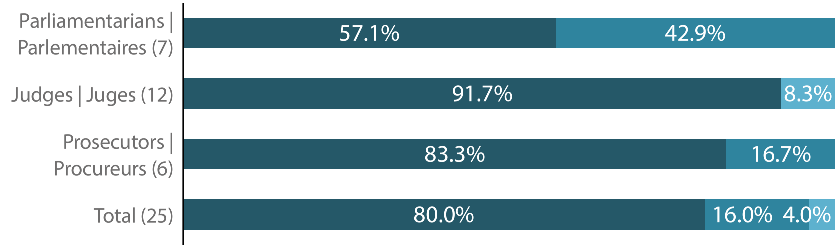
Montenegro | Monténégro (2019)*



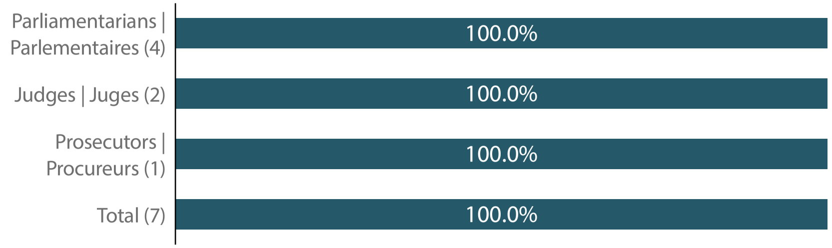
Netherlands | Pays-Bas (2021)*



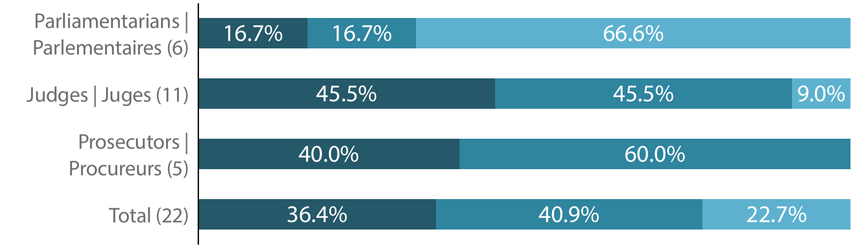
North Macedonia | Macédoine du Nord (2023)*



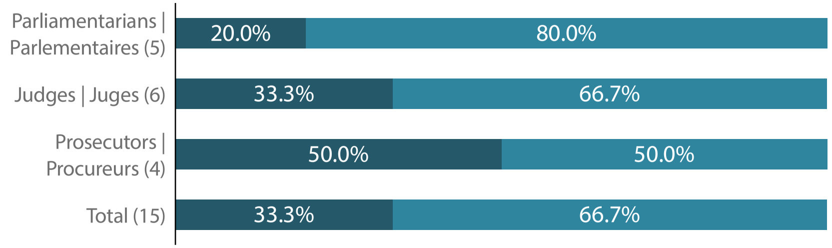
Norway | Norvège (2019)*



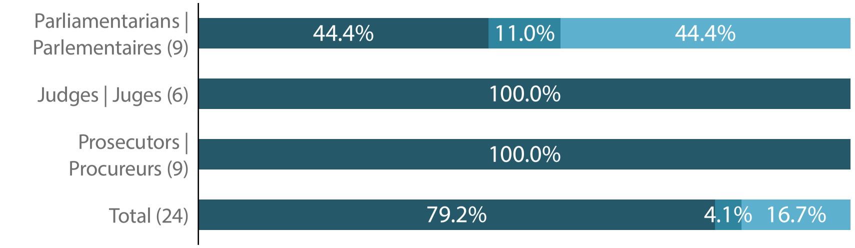
Poland | Pologne (2024)



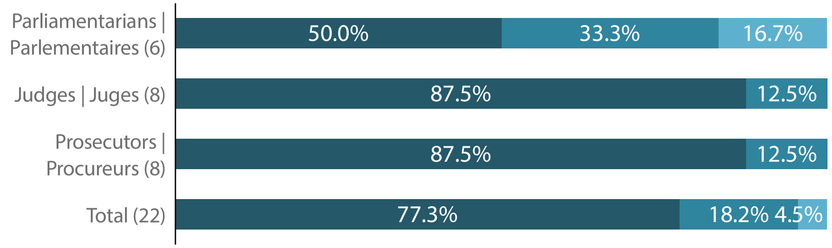
Portugal (2025)



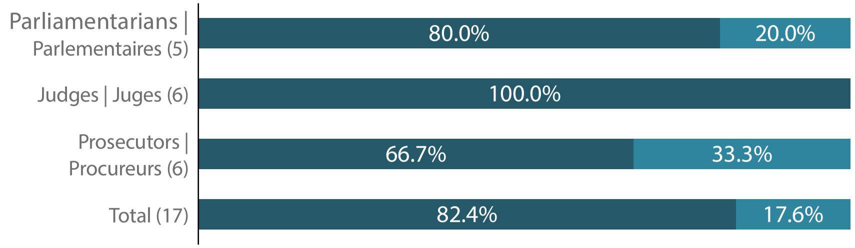
Romania | Roumanie (2024)



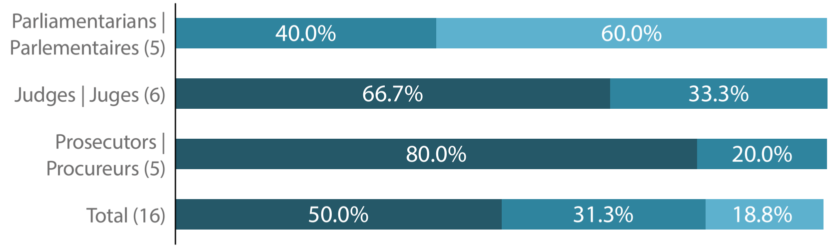
San Marino | Saint-Marin (2024)*



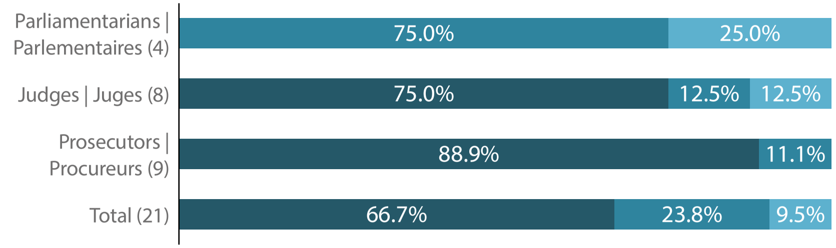
Serbia | Serbie (2023)*



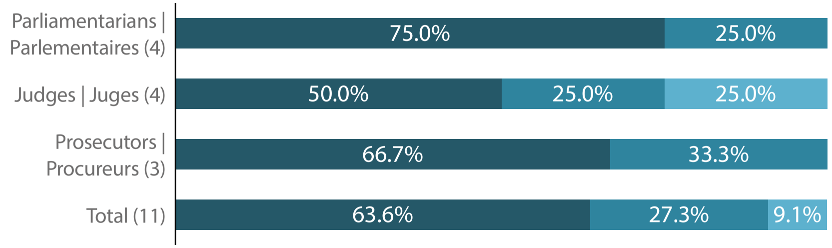
Slovak Republic | République Slovaque (2020)*



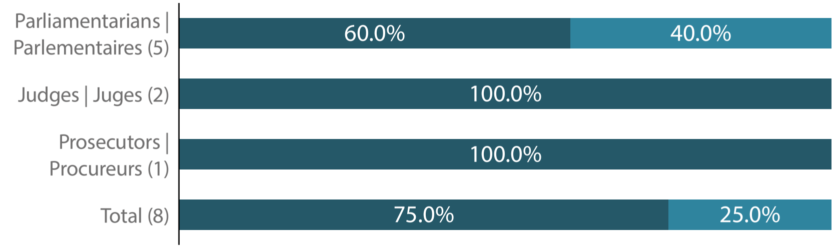
Slovenia | Slovénie (2018)*



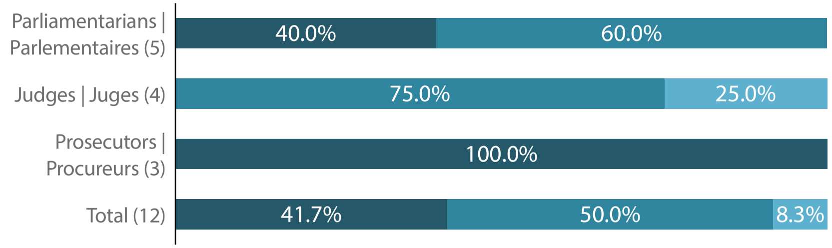
Spain | Espagne (2024)*



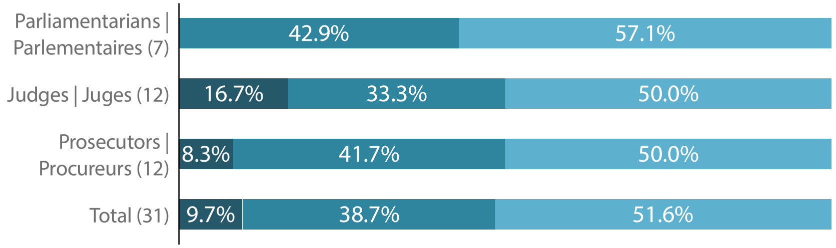
Sweden | Suède (2017)*

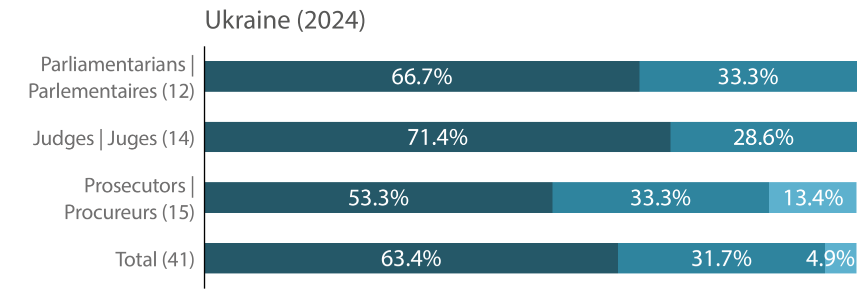


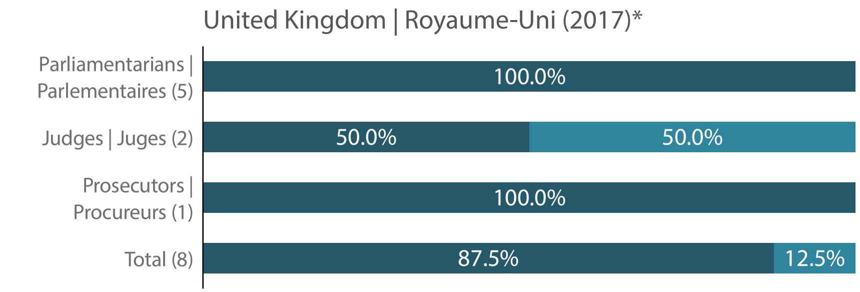
Switzerland | Suisse (2024)*

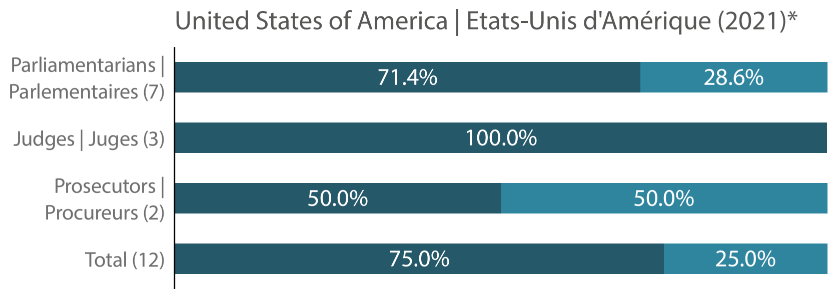


Türkiye (2023)



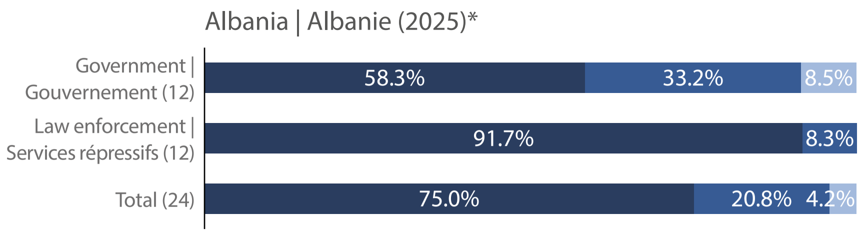


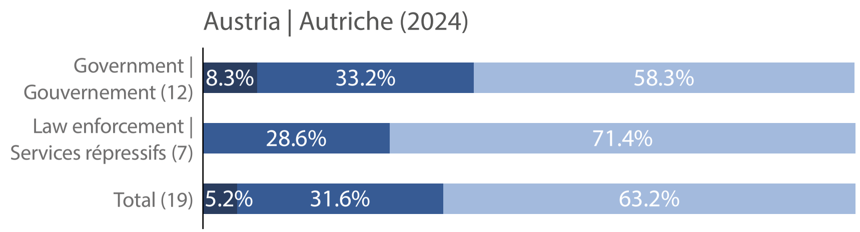




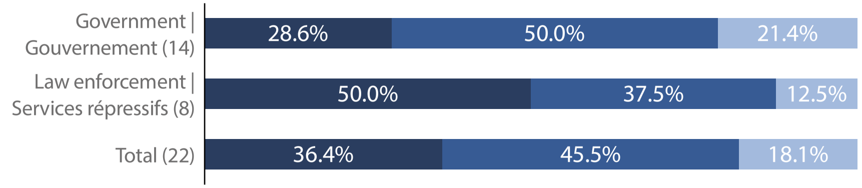
5th Evaluation Round – Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies

Implemented | Mise en œuvre   Partly implemented | Partiellement mise en œuvre   Not implemented | Non mise en œuvre

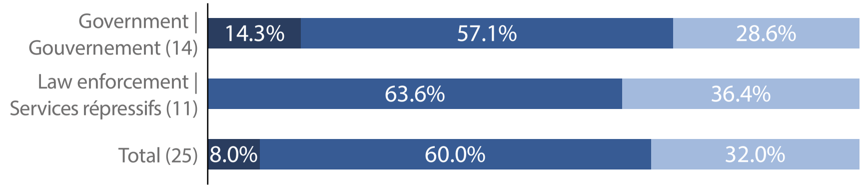




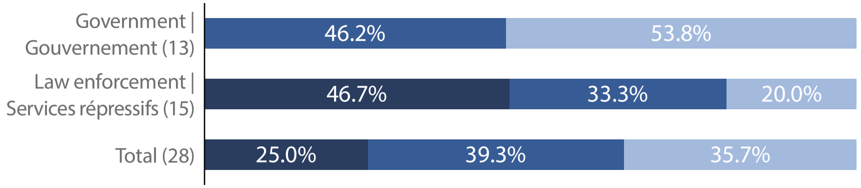
Belgium | Belgique (2025)



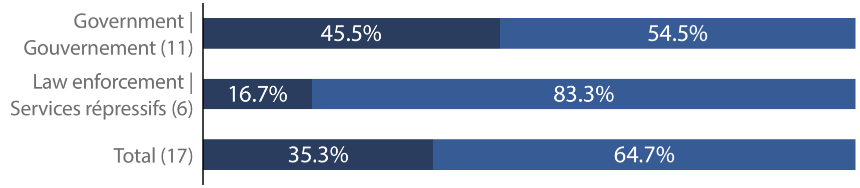
Bosnia and Herzegovina | Bosnie-Herzégovine (2024)



Bulgaria | Bulgarie (2024)

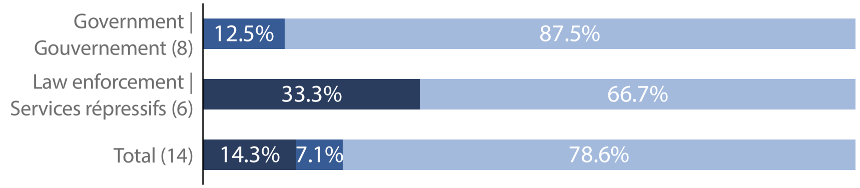


Croatia | Croatie (2024)

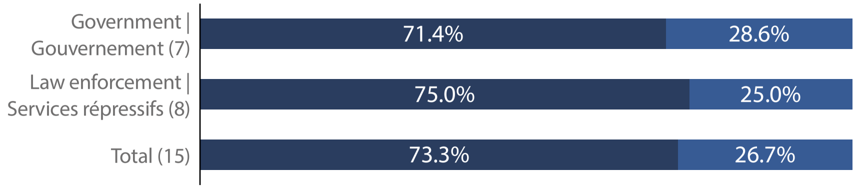


Cyprus | Chypre (2025)

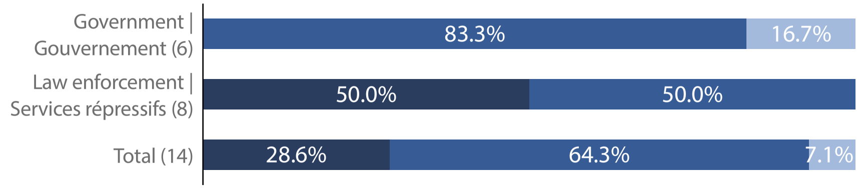
Denmark | Danemark (2025)



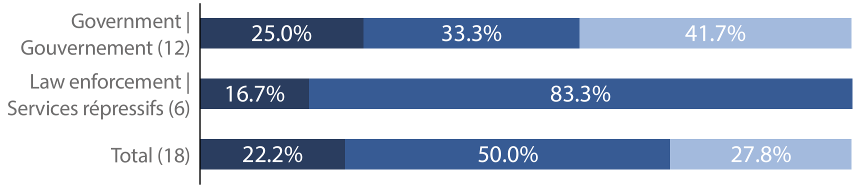
Estonia | Estonie (2023)*



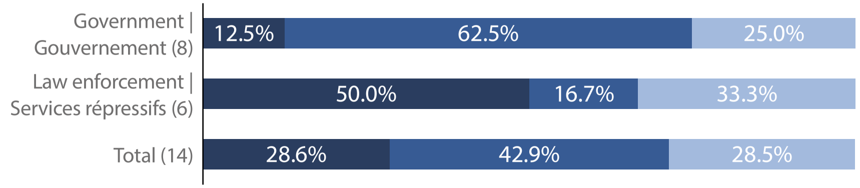
Finland | Finlande (2024)



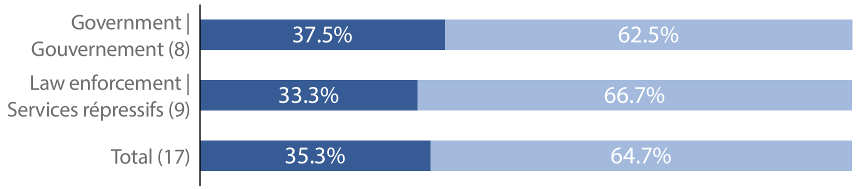
France (2025)



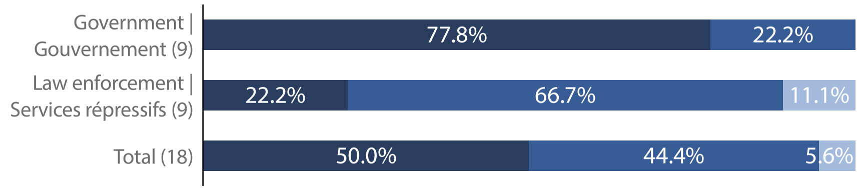
Germany | Allemagne (2025)



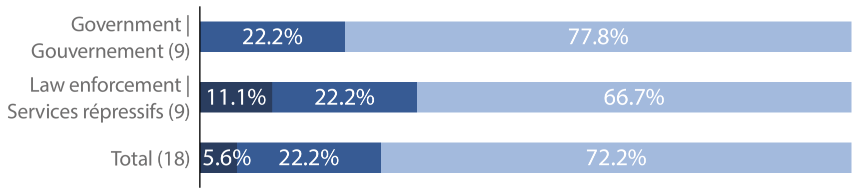
Greece | Grèce (2024)



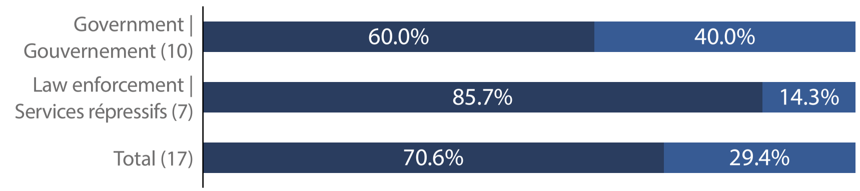
Iceland | Islande (2024)



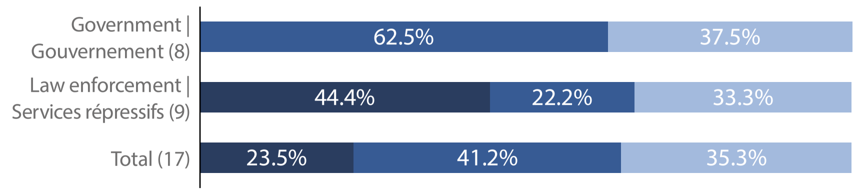
Ireland | Irlande (2024)



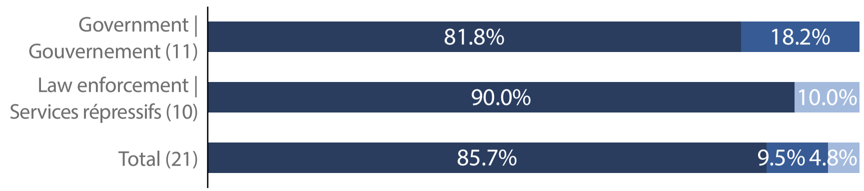
Latvia | Lettonie (2022)*



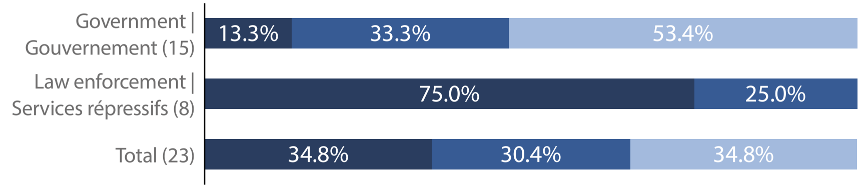
Lithuania | Lituanie (2024)



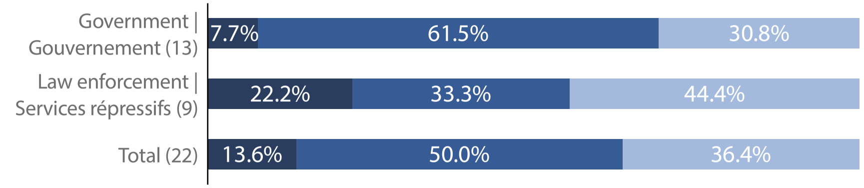
Luxembourg (2022)*



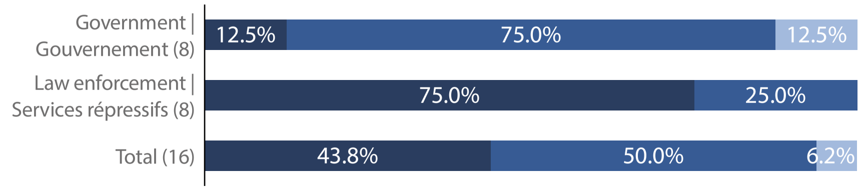
Malta | Malte (2025)



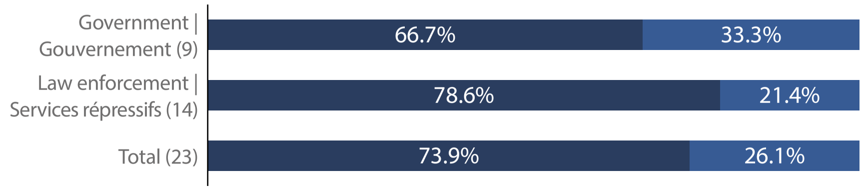
Montenegro | Monténégro (2024)



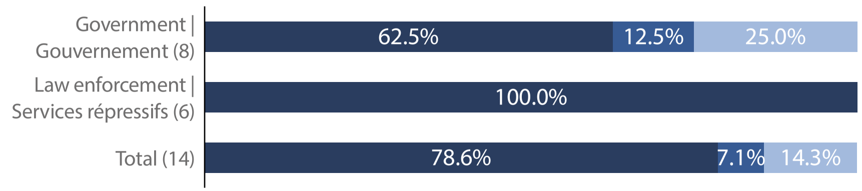
Netherlands | Pays-Bas (2025)



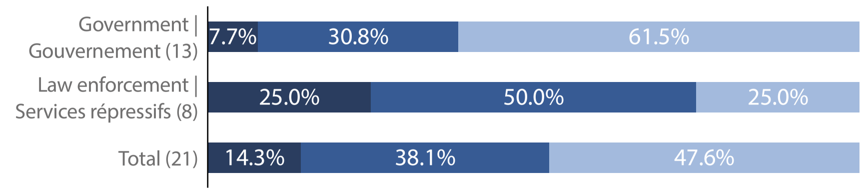
North Macedonia | Macédoine du Nord (2025)



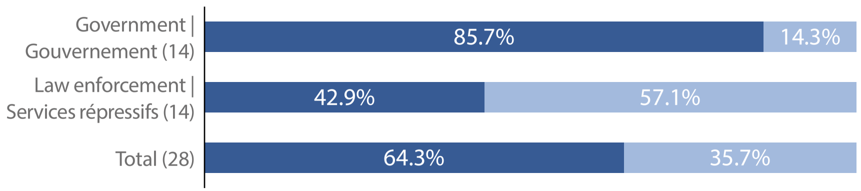
Norway | Norvège (2025)*



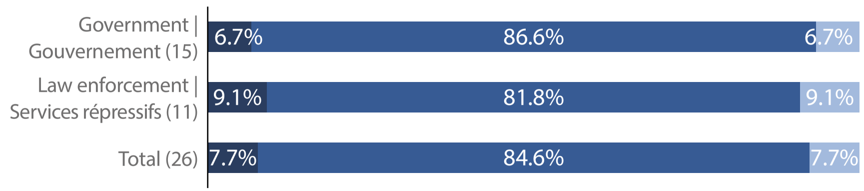
Poland | Pologne (2025)



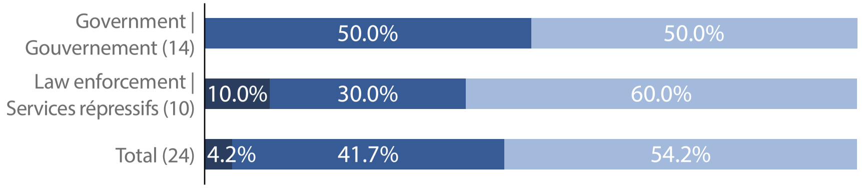
Portugal (2025)



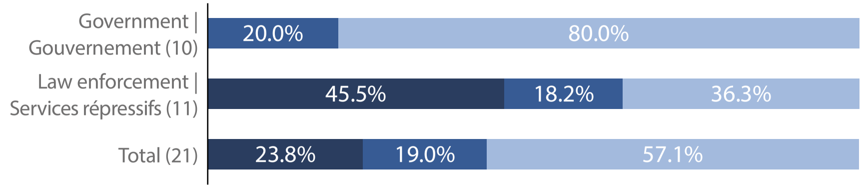
Romania | Roumanie (2025)



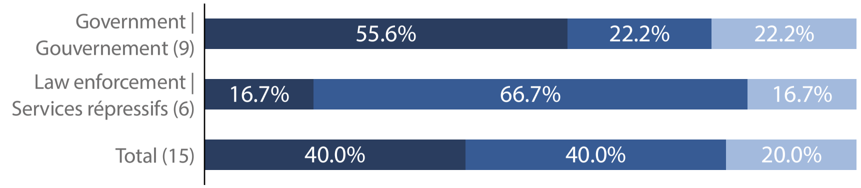
Serbia | Serbie (2024)



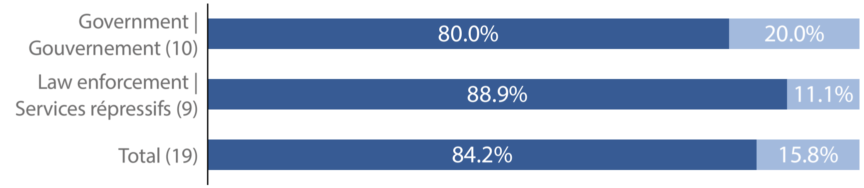
Slovak Republic | République Slovaque (2025)



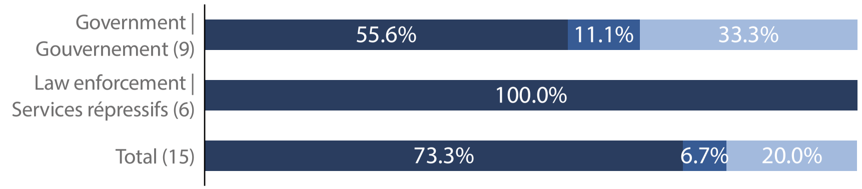
Slovenia | Slovénie (2024)



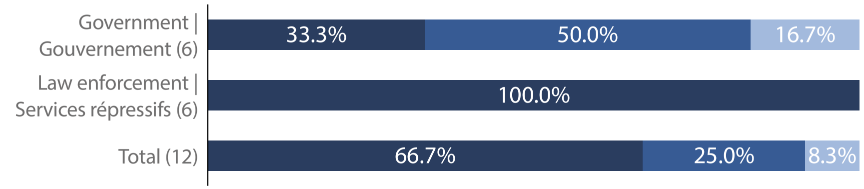
Spain | Espagne (2025)



Sweden | Suède (2025)*



United Kingdom | Royaume-Uni (2025)*



Appendix 3 – Core programme (2025)

On-site visits in 2025

6th Evaluation Round

- Estonia (7-11 April)
- Slovak Republic (19-23 May)
- Luxembourg (22-26 September)
- Slovenia (24-28 November)

Mission in the framework of the *ad hoc* procedure (Rule 34)

- Slovak Republic (18-19 February)

High-level mission in the framework of the 5th Round compliance procedure

- Denmark (7 April)

High-level mission in the framework of the 4th Round compliance procedure

- Türkiye (18 June)

High-level mission in the framework of the 4th and 5th Round compliance procedures (incl. *ad hoc* procedure (Rule 34))

- Poland (28 November)

Meetings in 2025

GRECO Plenary

- GRECO 99 (17-19 March)
- GRECO 100 (3-6 June)
- GRECO 101 (18-21 November)

GRECO Bureau

- Bureau 107 (3 February)
- Bureau 108 (28 April)
- Bureau 109 (9 October)

Round 6 Training Evaluators (Strasbourg, 20-21 March)

Other Key Events

- Transitioning from the 5th to the 6th Evaluation Round & Engaging with NGOs (5 June)
- Strengthening good governance: Consolidating Integrity and Accountability at the Sub-National Level, organised jointly with the Council of Europe Congress of Local and Regional Authorities (20 November)

GRECO Statutory Committee

- 34th Meeting (15 October)

Evaluation reports adopted in 2025

3rd Evaluation Round

- Kazakhstan

Compliance reports adopted in 2025

5th Evaluation Round compliance procedure

- Azerbaijan, Cyprus, Czechia, Portugal, Romania - procedures ongoing
- Albania, Finland, Iceland, North Macedonia, Norway, Slovenia, Sweden, United Kingdom – procedures closed

Rule 32 revised procedures – insufficient compliance

- Germany – procedures opened
- Belgium, Croatia, Denmark, France, Malta, the Netherlands, Poland, Slovak Republic, Spain – procedures maintained

4th Evaluation Round compliance procedure

- Liechtenstein, Romania – procedures on-going
- Belgium, Ireland – procedures closed

Rule 32 procedures – globally unsatisfactory compliance

- Portugal – procedures maintained

***Ad hoc* procedure (Rule 34)**

- Slovak Republic – procedures ongoing

Appendix 4 – GRECO delegations (at 3 december 2025)

GRECO MEMBER STATES

ALBANIA

Ms Adea PIRDENI (Head of delegation)
State Minister for Public Administration and Anti-Corruption
Prime Minister's Office

Ms Rovena PREGJA
Head of Unit
Directorate of Programs and Projects in the field of Anticorruption
Ministry of Justice

Substitut/e
Ms Silvana RAMADANI
Advisor on Anticorruption Portfolio to the State Minister for Public Administration and Anti-Corruption

Substitut/e
Ms Xhulia MULLA
Expert
General Anticorruption Directorate
Ministry of Justice

ANDORRA

Ms Eva GARCIA LLUELLES (Head of delegation)
International Relations and Cooperation in the Legal Field
Ministry of Justice and the Interior

Substitut/e
Ms Marta VILLAGRASA
Legal Officer, Office of International Legal Relations and Cooperation
Department of Justice and the Interior
Ministry of Justice and the Interior

ARMENIA

Ms Anna KARAPETYAN (Head of delegation)
Deputy Minister of Justice
Ministry of Justice

Ms Tatevik KHACHATRYAN
Head of the Monitoring Division
Anti-Corruption Policy Development and Monitoring Department
Ministry of Justice

Substitut/e
Mr Yeprem KARAPETYAN
Head
Anti-Corruption Policy Development and Monitoring Department
Ministry of Justice

AUSTRIA

Ms Brigitte ROM (Head of delegation)
Federal Ministry of Justice
Section IV - Criminal Law
Division IV 1 (Substantive Criminal Law)

Ms Silvia THALLER
Senior Public Prosecutor
Public prosecutor's office for the prosecution of economic offences and corruption

Substitut/e
Mr Luca MAK
Head of the Unit for International Cooperation
Federal Bureau of Anti-Corruption
Federal Ministry of the Interior

Substitut/e
Ms Assunta THURNHER-SIGMAIER
Unit 2.3 International Cooperation
Federal Bureau of Anti-Corruption
Federal Ministry of the Interior

AZERBAIJAN

Mr Elnur MUSAYEV (Head of delegation)
Head of the Non-Criminal Proceedings Department
Prosecutor's Office of the Republic of Azerbaijan

Substitut/e
Mr Emin NASIBOV
Senior Adviser
Department on the work with law enforcement agencies
President's Office

Mr Tabriz MUSAYEV
Executive Secretary
Anti-Corruption Commission

Substitut/e
Mr Sabuhi ALIYEV
Head of Preventive Department
Anti-Corruption Department
General Prosecutor's Office

BELGIUM

Mr Carl PIRON (Head of delegation)
Attaché to the Criminal Policy Service
Directorate-General for Legislation, Freedoms, and Fundamental Rights
Federal Public Service Justice (FPS Justice)

Substitut/e
Ms Marie DE BROE
Attaché, Criminal Policy Division
DG Legislation, Freedoms, and Fundamental Rights
Federal Public Service Justice (FPS Justice)

Mr Jeroen CLARISSE
Legal Advisor to the Chamber of Representatives
Federal Parliament
Palais de la Nation

Substitut/e
Ms Sophie MORIS
Director
Integrated Office
Federal Public Service (FPS) Strategy and Support

BOSNIA AND HERZEGOVINA

Mr Adnan DLAKIĆ (Head of delegation)
Expert Adviser for Combating Corruption
Department for Combating Organized Crime and Corruption
Ministry of Security

Mr Nenad EŠPEK
Expert Adviser for Combating Organized Crime
Section for Combating Organized Crime & Corruption
Ministry of Security

BULGARIA

Mr Georgi RUPCHEV (Head of delegation)
State Expert
Directorate of International Legal Cooperation and European Affairs
Ministry of Justice

Substitut/e
Mr Florian FLOROV
State Expert
Directorate of International Legal Cooperation and European Affairs
Ministry of Justice

CROATIA

Ms Sunčana ROKSANDIĆ (Head of delegation)
Associate Professor
Serving Head of Department
Department of Criminal Law, Faculty of Law
University of Zagreb

Substitut/e
Mr Dražen JELENIC
Deputy State Attorney General

Mr Krěsimir SIKAVICA
Head of Sector
Criminal Intelligence Sector
Criminal Police Directorate
General Police Directorate
Ministry of the Interior

Substitut/e
Mr Mladen BRUČIĆ-MATIC
Director-General for European Affairs, International and Judicial Cooperation and Prevention of Corruption
Ministry of Justice, Public Administration and Digital Transformation

CYPRUS

Ms Alexia KALISPERA (Head of delegation)
Bureau Member
Senior Counsel of the Republic
The Law Office of the Republic of Cyprus

Substitut/e
Ms Theodora PIPERI-CHRISTODOULOU
Senior Counsel of the Republic
The Law Office of the Republic of Cyprus

Ms Rena PAPAETI-HADJICOSTA
Attorney of the Republic
The Law Office of the Republic of Cyprus

CZECHIA

Ms Helena KLIMA LIŠUCHOVÁ (Head of delegation)
Head of the International Cooperation and EU Department
Ministry of Justice

Substitut/e
Ms Kristina KRÁL
Senior Ministerial Counsellor
Methodology and Conflict of Interest Control Unit
Conflict of Interest and Fight Against Corruption Department
Ministry of Justice

Ms Johana TREŠLOVÁ
Senior Ministerial Counsellor
Conflict of Interest and Anti-Corruption Department
Ministry of Justice

Substitut/e
Ms Barbora HOLUŠOVÁ
Senior Ministerial Counsellor
International Cooperation and EU Department
Ministry of Justice

DENMARK

Ms Clara WORSAAE MØLLER (Head of Delegation)
Head of Section
Ministry of Justice

Substitut/e
Mr Andreas LAURSEN
Senior Prosecutor
State Prosecutor for Special Crime

Mr Jonathan GASSEHOLM
Senior Prosecutor
National Special Crime Unit

Substitut/e
Mr Thomas ØSTERGAARD WIENAND
Associate Prosecutor
National Special Crime Unit

ESTONIA

Ms Kätlin-Chris KRUUSMAA (Head of delegation)
Head of Anti-Corruption Policy Team
Criminal Policy Department
Ministry of Justice and Digital Affairs

Substitut/e
Ms Kaie KÜNGAS
Adviser
Department of Local Governments
Ministry of Regional Affairs and Agriculture

Ms Laura VAIK
Advisor, Criminal Policy Department
Ministry of Justice

FINLAND

Ms Venla MÄNTYSALO (Head of delegation)
Senior Specialist
Department for Criminal Policy and Criminal Law
Ministry of Justice

Substitut/e
Mr Mikko HELKIÖ
Senior Ministerial Adviser
Internal Audit
Prime Minister's Office

Ms Katariina SIMONEN
Ministerial Adviser
Ministry of the Interior
Police Department

Substitut/e
Ms Merja NIEMI
Ministerial Adviser
Ministry of Education and Culture

FRANCE

Ms Lise CHIPAULT (Head of delegation)
Bureau Member
Magistrate – Special Advisor on International Civil and Criminal Matters to the Director of Legal Affairs
Ministry of Foreign Affairs

Substitut/e
Mr Matthieu AUGUSTIN
Magistrate
Deputy Head of the Office of Economic, Financial, and Social Law, the Environment, and Public Health
Directorate of Criminal Affairs and Pardons
Ministry of Justice
Deputy

Representative (honorary)
Mr Michel GAUTHIER
Honorary President of GRECO

Ms Claire DUBOIS-LIDON
International Relations Officer
French Anti-Corruption Agency (AFA)

Substitut/e
Mr Yann PHILIPPE
Head of the Department for Oversight of Public Officials
French Anti-Corruption Agency (AFA)

GEORGIA

Mr Razhdeni KUPRASHVILI (Head of delegation)
Head of Anti-Corruption Bureau

Mr Giorgi BAGDAVADZE
Head of the Department of International Relations
Anti-Corruption Bureau

GERMANY

Mr Markus BUSCH (Head of delegation)
Head of Division
Division for economic and environmental crime; money laundering; tax crime
Federal Ministry of Justice

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COUNCIL OF EUROPE

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Ambassador Extraordinary and Plenipotentiary
Permanent Representative of the United Kingdom
to the Council of Europe
President of GRECO's Statutory Committee

PARLIAMENTARY ASSEMBLY OF THE COUNCIL OF EUROPE (PACE)

Ms Agnes Sirkka PRAMMER
(Austria – Parliamentary Assembly Committee
on Legal Affairs and Human Rights)

Substitut/e
Ms Arusyak JULHAKYAN
(Armenia – Parliamentary Assembly Committee
on Legal Affairs and Human Rights)

EUROPEAN COMMITTEE ON LEGAL COOPERATION (ECLC)

No nomination

EUROPEAN COMMITTEE ON CRIME PROBLEMS (ECCP)

No nomination

COUNCIL OF EUROPE DEVELOPMENT BANK (CEB)

Ms Katherine DELIKOURA
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Ms Tanya KHAVANSKA
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Chief
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Appendix 5 – Contacts and outreach (2025)

GRECO PLENARY

- Exchange of views on Norway's Dilemma Archive: *A Concrete Tool for Strengthening Police Ethics and Conduct*, with the participation of Maren GJOEN ENGEBRETSEN, Senior Advisor, Police Directorate, Norway (101st GRECO Plenary meeting, 19 November)
- Exchange of views with Ambassador Sandy MOSS, President of GRECO's Statutory Committee and Ambassador Gabriel REVEL, President of the Committee of Ministers' Group of Rapporteurs on Legal Cooperation (GR-J) on transparency of documents (101st GRECO Plenary meeting, 21 November)

EUROPEAN UNION (EU)

- Horizontal consultations at the request of the European Commission, DG-JUST and DG-HOME (online, 27 January) – Secretariat
- Exchanges of views with the Democracy, Rule of Law and Fundamental Rights Monitoring Group (DRFMG) of the European Parliament Committee on Civil Liberties, Justice and Home Affairs (LIBE) (online, 30 January, 2 July and 24 September) – Secretariat
- Bilateral discussions at the request of the European Commission, Directorate-General for Enlargement and the Eastern Neighbourhood – DG-ENEST (Strasbourg, 11 June) – Secretariat
- Meeting between GRECO's President and European Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection, Michael McGrath (Strasbourg, 16 June) –President and Secretariat
- Third plenary meeting of the EU Network Against Corruption (Brussels, 15 October) – GRECO Vice-President on *Enhancing a culture of integrity and transparency through education*; and Secretariat
- European Parliament, Committee on Civil Liberties, Justice and Home Affairs (LIBE), *Shadows meeting on the Report on the Commission's 2025 Rule of Law report* (Strasbourg, 24 November) – Secretariat and Director of Security, Integrity and the Rule of Law
- European Parliament, Democracy, Rule of Law and Fundamental Rights Monitoring Group (DRFMG) of the Committee on Civil Liberties, Justice and Home Affairs (LIBE), Monitoring the compliance with the rule of law by the European Union (Brussels, 2 December) – Secretariat

INTERPOL

- INTERPOL Anticorruption and Asset Recovery Global Conference, *Plenary Session 16: The Role of Prosecutors in the Fight against Corruption* (Abu Dhabi, 11-13 November) – Secretariat

ORGANISATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD)

- Member of the Panel of the OECD Anti-Corruption Research Challenge (online, February) – Secretariat
- OECD Working Group on Bribery in International Business Transactions – WGB (online, 11-14 March and 24-27 June) – Secretariat
- OECD Global Anti-Corruption and Integrity Forum (GACIF, including *Session 8: Addressing strategic corruption: How to leverage the anti-corruption toolbox* –President (Paris, 26-27 March) - Secretariat
- OECD Working Party on Public Integrity and Anti-Corruption, including *Session 4: OECD Public Integrity Indicators: Update on Integrity of the Justice and Disciplinary Systems* (Paris, 28 March) – Secretariat
- OECD Anti-Corruption Network for Eastern Europe and Central Asia (OECD-ACN) Plenary Meeting (Paris, 8-9 July) – Secretariat

ORGANISATION FOR SECURITY AND CO-OPERATION IN EUROPE/OFFICE FOR DEMOCRATIC INSTITUTIONS AND HUMAN RIGHTS (OSCE/ODIHR)

- OSCE/ODIHR-PACE study visit for the National Assembly of Armenia – Exchange of views with GRECO's President on 4th Evaluation Round recommendations concerning parliamentary integrity (London, 15 October) – President
- Study visit for selected members of Parliament of the Verkhovna Rada of Ukraine and the National Assembly of North Macedonia (London, 9-10 September) – President

ORGANIZATION OF AMERICAN STATES (OAS)

- Follow-Up Mechanism for the Implementation of the Inter-American Convention against Corruption (MESICIC), *43rd Meeting of the Committee of Experts, Special session: Open Data to Prevent and Combat Corruption* (online, 12 March) – Secretariat

UNITED NATIONS

- UNODC First Resumed 16th Session of the Implementation Review Group (IRG) of the United Nations Convention against Corruption (UNCAC) and 16th Session of the Working Group on the Prevention of Corruption (Vienna, 16-19 June) – Secretariat
- UNODC, 11th Session of the Conference of the State Parties to the United Nations Convention against Corruption and joint special event on *Milestones and Future Directions of Global Review Mechanisms* (Doha, 15-19 December) – Secretariat

CO-OPERATION AND SYNERGY MEETINGS (GRECO, OECD WGB, OAS, MESICIC, AND UNODC UNCAC)

- Co-operation and synergy meeting on civil society engagement in the various anti-corruption mechanisms (online, 23 January) – Secretariat
- Co-operation and synergy meeting with Secretariat counterparts in the OECD, OAC and UNODC (online, 31 July) - Secretariat

OTHER CONTACTS

- Meeting with representatives of the Judicial Council of the Slovak Republic (online, 5 March) – Secretariat
- Meeting with a delegation from the Netherlands: Jan Anthonie BRUIJN, President of the Senate (Eerste Kamer), Martin BOSMA, President of the House of Representatives (Tweede Kamer), Remco NEHMELMAN, Secretary General of the Senate, Peter OSKAM, Secretary General of the House of Representatives, Maxim POS, Head of Protocol, House of Representatives, Femmy BAKKER-DE JONG, Secretary of the PACE delegation of the Netherlands (Strasbourg, 21 March) – Secretariat
- Study visit of European Law Students Association (ELSA) students from Fribourg (Strasbourg, 26 March) – Secretariat
- University of Pavia course on *Transparency and Anti-Corruption Law, talk on The Group of States Against Corruption on the making of strong anticorruption systems* (online, 1st April) – Vice-President
- High-level conference *2030 Albania in the EU – The Path of Reforms* (Tirana, 3 April) – Bjørn BERGE, Deputy Secretary General of the Council of Europe, Hanne JUNCHER, Director of Security, Integrity and Rule of Law, Laura STEFAN, Anti-corruption expert (Expert Forum) and GRECO evaluator
- Columbia University, talk on *The role of GRECO in the promotion of integrity and the prevention of corruption in municipalities* (online, 7 April) –Vice-President
- Bissau Law School Postgraduate course on corruption, money laundering and organized crime, talk on *The role of GRECO and other international review mechanisms in the creation and consolidation of strong anti-corruption systems* (online, 7 May) – Vice-President
- Study visits of judges from Sweden to the European Court of Human Rights and the Council of Europe (Strasbourg, 14-15 May) – Secretariat
- Summer school on *Les instruments juridiques du Conseil de l'Europe de lutte contre la corruption*, talk on *Les mécanismes de suivi du GRECO et leur impact* (Strasbourg, 1st July) – Secretariat
- Meeting with Anticor's representatives (Strasbourg, 19 September) – Secretariat
- Faculty of Law event on *The financing of political parties* (Bucharest, 9 October) – speaker on GRECO's recommendations under the Third Evaluation Round - Sorin Tănase, Bureau member
- Meeting with a representative of the Basel Institute on Governance (Strasbourg, 21 October) – Secretariat
- Presentation on GRECO's work for students of the University of Strasbourg's Master Human Rights Law in a Changing World (Strasbourg, 22 October) – Secretariat
- AMLP 14th Annual *Anti-Bribery and Corruption Forum: A Global Outlook* (London, 12 November) – Secretariat
- European Partners Against Corruption & European contact-point network against corruption (EPAC/EACN) 24th Annual Professional Conference and General Assembly (The Hague, 24-25 November) – President

- MATRA Training on Democratic institutions for participants from the Hague Academy for Local Governance (online, 3 December) – Secretariat
- Study visit for magistrates from the Ecole nationale de la magistrature (ENM) of France (Strasbourg, 5 December) – Secretariat
- *IV Regional Conference on the Prevention of Corruption and Transparency*, organised by the Regional Government of the Azores – speaker on GRECO's 6th Evaluation Round (Azores, 5 December) - Vice-President

COUNCIL OF EUROPE

- Contribution to the discussions within the Council of Europe's Steering Committee on Democracy (CDDEM) on Draft parameters to facilitate the application and implementation of the Reykjavik Principles for Democracy (online, 6-7 March; Strasbourg, 26-27 May, 13 October, 26 November) – Secretariat
- 142nd Plenary Session of the European Commission for Democracy through Law (Venice Commission) *Exchange of views with GRECO's President* (Venice, 14 March) – President and Secretariat
- Parliamentary Assembly of the Council of Europe (PACE) roundtable *Strengthening Ethics and Integrity in Parliaments* (London, 31 March) – President & Marja TUOKILA, Counsel to the Legal Affairs Committee of the Finnish Parliament and GRECO Evaluator
- Directorate General of Democracy and Human Dignity, Division of Elections and Participatory Democracy, meeting on Council of Europe developments and perspectives in the electoral field - Electoral Cycle (Strasbourg, 4 April) – Secretariat
- Side event on *The democratic reforms – basis of stability and prosperity* hosted by the Consulate General of Kazakhstan in Strasbourg during the 2nd part-session of the Parliamentary Assembly of the Council of Europe (Strasbourg, 10 April) – Secretariat
- Council of European Action Plan for Armenia 2023-2026: *Study visit for management staff of the Constitutional Court of Armenia* (28 April) – Secretariat
- Exchange of views and presentation of GRECO's 25th General Activity Report (2024) to the Committee of Ministers (1530th meeting of the Ministers' Deputies, 4 June) – President, Secretariat
- Exchange of views with the PACE Committee on the Honouring of Obligations and Commitments by Member States of the Council of Europe (Monitoring Committee) (Strasbourg, 23 June) – Secretariat
- Exchange of views with the PACE Committee on the Honouring of Membership Obligations to the Council of Europe by Spain (Monitoring Committee) (Paris, 9 September) – Secretariat
- Meeting of the inter-Secretariat Community of Practice on civil society engagement (Strasbourg, 10 September) – Secretariat
- Meeting of Mr Alain Berset, Secretary General, with the Chairs of the Council of Europe Monitoring Bodies (Strasbourg, 16 September) – President and Secretariat
- Access Info Group for the Council of Europe's Tromsø Convention and Committee of the Council of Europe's Convention 108, *Transparency and Privacy in Democratic Societies*, opening remarks (Strasbourg, 4 November) – President, Vita Habjan Barborič and Vladimir Georgiev, GRECO Evaluators, and Secretariat
- Round table on *Strengthening ethics and integrity in parliaments*, organised by the PACE Committee on Rules, Ethics and Immunities together with the Standing Committee of the House of Representatives on Institutions, Merit and the Ombudsmen of Cyprus (Limassol, 14 November) – Alexia KALISPERA, GRECO Bureau member
- Statement by GRECO's President on "Democracy is at risk without a culture of integrity and strong anti-corruption action", issued on the occasion of International Anti-Corruption Day (9 December) – President

Appendix 6 – GRECO Secretariat

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Appendix 7 – Membership (2025)[11]

By date of accession

Belgium, Bulgaria, Cyprus, Estonia, Finland, France, Germany, Greece, Iceland, Ireland, Lithuania, Luxembourg, Romania, the Slovak Republic, Slovenia, Spain, Sweden (founding states - 1 May 1999)

Poland (date of accession: 20 May 1999), Hungary (9 July 1999), Georgia (16 September 1999), United Kingdom (18 September 1999), Bosnia and Herzegovina (25 February 2000), Latvia (27 July 2000), Denmark (3 August 2000), United States of America (20 September 2000), North Macedonia (7 October 2000), Croatia (2 December 2000), Norway (6 January 2001), Albania (27 April 2001), Malta (11 May 2001), Republic of Moldova (28 June 2001), Netherlands (18 December 2001), Portugal (1 January 2002), Czechia (9 February 2002), Serbia (1 April 2003), Türkiye (1 January 2004), Armenia (20 January 2004), Azerbaijan (1 June 2004), Andorra (28 January 2005), Ukraine (1 January 2006), Montenegro (6 June 2006), Switzerland (1 July 2006), Austria (1 December 2006), Italy (30 June 2007), Monaco (1 July 2007), Liechtenstein (1 January 2010), San Marino (13 August 2010), Kazakhstan (1 January 2020).

11. The Russian Federation ceased to be a member of GRECO on 1st July 2023. Belarus ceased to be a member of GRECO on 1st May 2024.

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