

# GROUP OF STATES AGAINST CORRUPTION (GRECO)

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



Featured Article:  
**The state of lobbying and influence today –  
recent findings and observations by the OECD**  
Julio Bacio Terracino

**Anti-corruption body  
of the Council of Europe**  
23rd General Activity Report (2022)



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

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

# 23<sup>rd</sup> General Activity Report (2022)

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Corruption (GRECO)

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challenges and good practices  
in Europe & the United States of America

Adopted by GRECO  
(March 2023)

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**The state of lobbying and influence today –  
recent findings and observations by the OECD**

Julio Bacio Terracino

Head of the OECD Public Sector Integrity Division

French edition:  
*23<sup>e</sup> Rapport général d'activités (2022)*  
*du Groupe d'Etats contre la Corruption*

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## INTRODUCTION BY THE PRESIDENT OF GRECO

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*Marin MRCELA, Justice of the Supreme Court of Croatia*

**T**he year 2022 will be remembered for the aggression of the Russian Federation against Ukraine. The human suffering inflicted and the violations of its international obligations committed by Russia since the start of the invasion in February 2022 have confirmed our resolve to work for the fundamental values of the Council of Europe. It is my heartfelt wish, shared by all GRECO representatives, that the war and the suffering will end soon.

By Resolution of the Committee of Ministers adopted on 23 March 2021, the Russian Federation ceased to be a member of GRECO, except when GRECO exercises its functions under the Criminal Law Convention on Corruption with respect to the Russian Federation. GRECO completed the monitoring of that Convention under its 3<sup>rd</sup> Evaluation Round which has been closed in respect of Russia. The 4<sup>th</sup> and 5<sup>th</sup> Rounds are based on other Council of Europe instruments. GRECO is therefore not currently engaged with Russia in any way.

Also by decision of the Committee of Ministers, the participation rights of Belarus in respect of GRECO have been suspended, on the same terms.

GRECO has continued its monitoring under its 5<sup>th</sup> Evaluation Round on preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies. GRECO expects to complete the visits under this Round in the first half of 2024.

GRECO carried out 9 evaluation visits in 2022. GRECO adopted 8 evaluation reports and 31 compliance reports, including a Rule 34 report which was incorporated into an ongoing compliance procedure in respect of the country concerned.

GRECO continues to note an overall high level of engagement on the part of our member states in the GRECO evaluation and compliance process. This concerns the execution of the monitoring work and the engagement of the national delegates to GRECO, both of which function very well indeed. It means there is a continuous peer-based dialogue and exchange about how to prevent and combat corruption.

While this strong support for the GRECO monitoring work and its procedures is clearly indispensable, the implementation of GRECO's recommendations is ultimately decisive for any real progress and, as the statistics contained in this report illustrate, implementation can and should be strengthened. In addition to the progress we can observe on legislative frameworks and institution-building, member states should focus on delivering specific improvements in the areas identified by GRECO, be it effective preventive work, integrity screening, conflicts of interest, asset declarations, contacts with 3<sup>rd</sup> parties, investigations, enforcement, judicial independence or political financing.

I can only agree with the observation made in the Report of the High Level Reflection Group of the Council of Europe that corruption is a factor in the growing disconnect between public expectations and political institutions' record of delivery and affects the level of trust in public authorities.

I would like to thank the successive Secretaries General for their unwavering support for GRECO's work. Whether it is in the context of the Secretary General's annual Report on the state of Democracy, Human Rights and the Rule of Law in Europe or in the course of their high-level bilateral visits, I am grateful for their efforts to support the implementation of our recommendations at the highest level. I trust this support will continue in the years ahead and I look forward to following the outcomes of the 2023 Council of Europe Summit of Heads of State and Government.

GRECO has continued its cooperation with the Council of Europe's Parliamentary Assembly (PACE) on files of mutual interest. We have been pleased to see the priority attached by PACE to economic crime and corruption and the related human rights issues, as demonstrated inter alia in the Resolutions adopted by PACE on "The need to strengthen financial intelligence units", "Fighting corruption - General principles of political responsibility", and "How to put confiscated criminal assets to good use".

GRECO attaches great importance to ensuring cooperation and synergies with the other international anti-corruption monitoring bodies. This is the case as regards the United Nations, notably the UNODC. GRECO also cooperates with the Organisation for Economic Co-operation and Development (OECD) and takes part in its Working Group on Bribery in International Business Transactions and its Working Party of Senior Public Integrity Officials (SPIO), and with the G20 Anti-Corruption Working Group. Cooperation is also in place with the Organization of American States (OAS). All of the afore-mentioned organisations have observer status with GRECO, and vice-versa. We cooperate within the boundaries of our respective mandates, and our Secretariats meet regularly to coordinate, exchange information and organise joint events where possible. On behalf of GRECO, I welcome the voluntary contribution made by Belgium for the period 2022-2023 in support for the implementation of GRECO's Programmes of Activities with a focus on our collaboration and synergy efforts in the wider anti-corruption landscape.

The European Union also has observer status with GRECO and cooperation remains close. GRECO evaluation and compliance reports feature strongly in the European Commission Rule of Law Report. As I have underlined on previous occasions, the door continues to be open for a full EU membership of GRECO. The developments around allegations of bribery and foreign influence vis-à-vis the European Parliament at the end of the year would appear to confirm the merit of looking at a closer engagement of the European Union within GRECO. GRECO would welcome this.

In my contacts with GRECO's members, national officials and heads of anti-corruption agencies, my interlocutors often mention that they are looking to create a mentality of zero tolerance of corruption. I am then asked how this can be done. While there is no simple answer to this, political will and leadership are clearly key ingredients, along with education. I would like to stress once again that the battle against corruption should start at the earliest stage possible if we want to nurture the right mentalities. Education remains one of the strongest tools for preventing and fighting corruption.

Moreover, it is essential that those appointed to decision-making roles, including but not only in the field of fighting corruption, have themselves a strong mentality of integrity.

GRECO has previously created education modules on anti-corruption in a collaboration with the "Federation for EDucation in Europe" (FEDE) precisely in order to allow students to understand the social, economic and political cost and impact of corruption.

GRECO member states also benefit from the technical assistance provided by the Economic Crime Cooperation Division of the Council of Europe which aims to support and facilitate the steps needed by member states to implement GRECO's recommendations.

GRECO also takes part in the work of the International Partnership Against Corruption in Sport (IPACS), an important multi-stakeholder platform for mitigating the risk of corruption in sport.

When it comes to preventing and addressing corruption, transparency, oversight and accountability are the key building blocks. However, transparency without accountability amounts to impunity which only exacerbates the risk of corruption and undermines public trust. GRECO is examining how member states tackle these questions under its 5<sup>th</sup> Round. One area where practice shows the need for more regulation, greater transparency and increased rigour is the engagement by persons with top executive functions with third parties and lobbyists.

GRECO has issued recommendations to this effect to most member states under the 5<sup>th</sup> Round, noting that rules on lobbying that are effectively implemented and allow the public to know who is seeking to influence public decision-making will help ensure accountability in central government, increase public trust in the administrative, policy- and decision-making processes, and strengthen public integrity.

There is clearly room for further progress when it comes to implementing those recommendations. These issues are explored in the essay by Julio BACIO TERRACINO, Head of Public Integrity at the OECD.

The rate and speed of publication of GRECO's reports is high and this is extremely positive. Here too, transparency is the first step towards change. But implementation of GRECO's recommendations should be further strengthened. Compliance within the 4<sup>th</sup> evaluation Round on the prevention of corruption for MPs, judges and prosecutors continues to be lowest when it comes to MPs (cf. statistics starting from page 30). Further progress requires genuine will by parliamentarians to engage in anti-corruption efforts, and change depends on parliamentarians themselves taking steps and reaching agreement.

Implementation under the 5<sup>th</sup> Round shows that more should be done to effectively prevent corruption and promote integrity among persons with top executive functions. In particular, states should make sure that their legislative and institutional integrity frameworks apply fully and directly to persons with top executive functions. This includes Presidents, Vice-Presidents, Prime Ministers, Ministers, Deputy Ministers, ministerial advisers and other politically appointed persons. More should also be done to ensure that corrupt behaviour and integrity failings on the part of the police come to light and are acted upon.

On the occasion of the International Anti-Corruption Day on 9 December, I issued a statement calling for transparency and appropriate consultation in legislative processes, including meaningful consultation with civil society and other stakeholders and respect for procedures related to legislative timelines. I would like to reiterate that message here.

GRECO will continue to strive to help ensure the highest standards of integrity in our member states and we are very grateful to them and their representatives, as well as to our partner institutions, agencies, observer organisations and experts, for supporting our work.





GRECO Plenary Meeting



Annual meeting of the International Partnership against Corruption in Sport (IPACS)



10<sup>th</sup> Annual Meeting of the Secretary General with the Heads of the Monitoring and Advisory Bodies of the Council of Europe



On-site visit – Azerbaijan



Exchange of views with Transparency International (TI - Corruption Perceptions Index)



On-site visit – Portugal



GRECO Plenary Meeting



On-site visit – Bosnia and Herzegovina



General Activity Report – press launch, Brussels



# KEY FINDINGS

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**G**RECO's evaluation work continued at full pace in 2022. GRECO carried out nine evaluation visits during the year and adopted eight evaluation reports and 31 compliance reports including one compliance report incorporating related follow-up to a Rule 34 report. The synthetic information set out below about GRECO's findings is based on the reports made public in 2022 or earlier.

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

The compliance process in the 4<sup>th</sup> Evaluation Round continued in 2022 (see Figure 1). Through the adoption of its 4<sup>th</sup> Round compliance reports, GRECO was able to push for the implementation of a solid body of recommendations to strengthen the prevention of corruption in respect of members of parliament, judges and prosecutors. The key findings of the 4<sup>th</sup> Evaluation Round have previously been summarised in a study entitled [Conclusions and Trends: Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors](#) (2017).

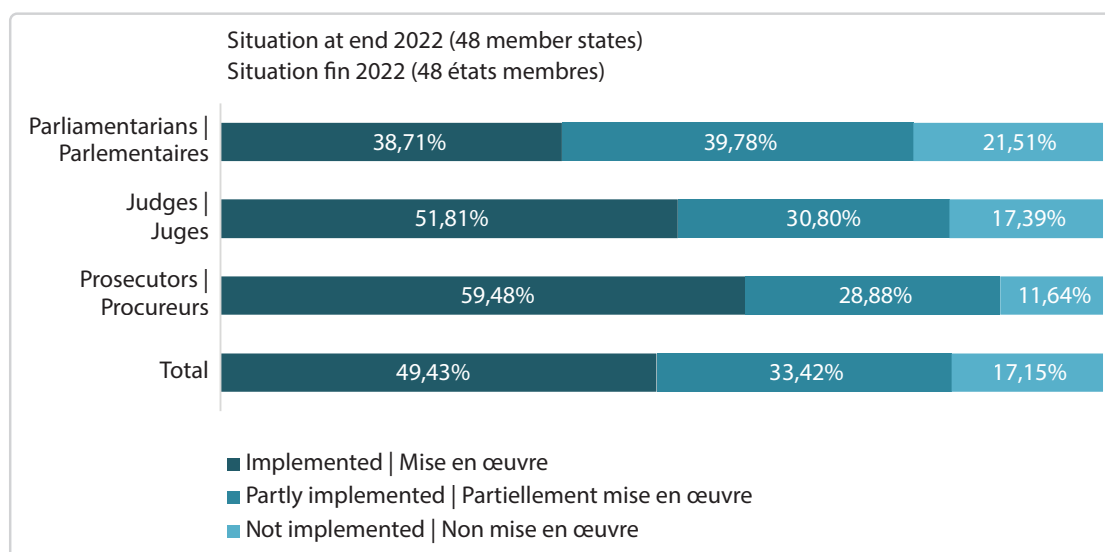
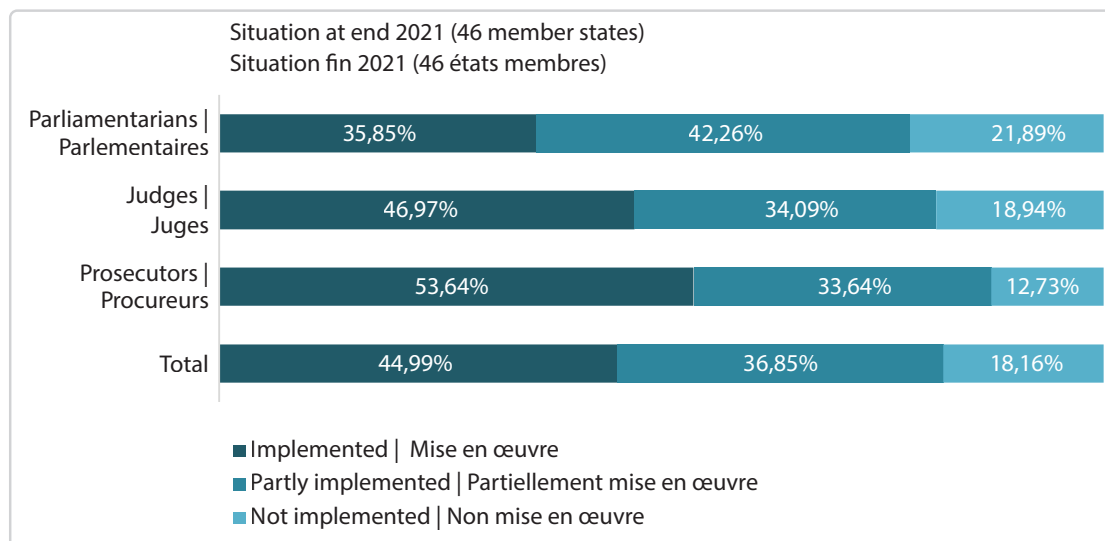
Most member states have made progress in drafting new Codes of Conduct for **Members of Parliament** and in preparing related laws and/or guidance concerning *inter alia* conflicts of interest, gifts, financial and ad hoc disclosure requirements, secondary activities, and contacts with lobbyists and third parties. The challenges lie with supervision, enforcement, guidance and awareness-raising mechanisms. With limited exceptions, GRECO observed that most of the proposed laws have not yet been adopted and that the practical measures necessary for their implementation are still not fully operational. Some member states have indicated that the development of such legislative and institutional changes was hampered by particular circumstances, most notably the COVID-19 pandemic.

Member states have made progress in complying with GRECO's recommendations concerning the **judicial branch**. New Codes of Ethics have been adopted, together with practical reforms regarding guidance and training. Financial disclosures, conflicts of interest and gifts are some of the issues dealt with in new regulations. Mechanisms for the appointment and evaluation of judges have also evolved as far as transparency and accountability are concerned. When constituted and empowered in line with the Council of Europe's standards and the recommendations of GRECO, judicial councils help bolster judicial independence and reduce the scope for discretionary or biased decision-making in respect of judges. In line with GRECO's inputs, some member states have taken steps to strengthen the role of these councils. GRECO observed that progress is still expected, and a more systematic approach necessary, when it comes to confidential counselling for judges on integrity matters.

Similarly to the initiatives concerning judges, member states have promoted **prosecutors'** integrity by drafting dedicated Codes of Ethics and, in some cases, by integrating them in adequate ways into regular training on conflicts of interest and related issues, e.g. acceptance of gifts and other advantages, incompatibilities and outside activities. While GRECO has welcomed such important initiatives, it has also underlined once more the need to complement them with effective supervision and enforcement. Similarly, in certain countries additional efforts must follow to develop adequate arrangements to shield the prosecution service from undue influence and interference in the investigation of criminal cases. This is particularly important for the prosecution of high-profile corruption cases.

**Figure 1 – Implementation of 4<sup>th</sup> Round recommendations by GRECO member states 2021-2022**

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 2021 or 2022, respectively.<sup>1</sup>



1. At end 2022, the following countries were in the non-compliance procedure under the 4<sup>th</sup> Round (application of Rule 32): Armenia, Bosnia and Herzegovina, Denmark, Hungary, Liechtenstein, Republic of Moldova, Poland (including Rule 34 follow-up), Portugal, Türkiye and Ukraine.

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

GRECO's 5<sup>th</sup> Evaluation Round deals with two categories: persons with top executive functions (PTEFs), and law enforcement. 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.

Setting the proper tone should start with those with **top executive functions** who should lead by example when it comes to integrity. 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

PTEFs should be included in existing integrity policies. GRECO has recommended analysing and mitigating the risks this group of officials is exposed to, and to build monitoring and compliance measures to help them achieve and *be seen to* achieve better progress in preventing corruption and instilling integrity. Most of the countries evaluated so far were asked to adopt codes of conduct for PTEFs or to revise them. Many of them were advised to adopt or consolidate in a single document policies or standards, providing clear guidance on conflicts of interest and other integrity related matters.

Particular emphasis was put on the enforcement of such codes, with effective mechanisms of supervision (with possible sanctions), coupled with confidential counselling and regular and compulsory training.

GRECO has paid particular attention to political advisors, a category of persons that generally falls within a grey area when it comes to the applicable integrity regimes. Because of their political role and possible influence in decision-making processes, GRECO has underlined that it is essential that the transparency and integrity requirements for political advisors be adapted to the nature of their mandate and their specific responsibilities, equivalent to those applied to other political appointees with top executive functions.

### Transparency and oversight of executive activities of central government

GRECO issued recommendations to many countries about the absence of rules or guidance on how PTEFs should engage with lobbyists or third parties seeking to influence the public decision-making process. Many countries were advised to ensure transparency in this area and asked to require disclosure of such contacts and sufficient details of the subject matters discussed. Moreover, reference must be made to informal contacts that happen outside the workplace whenever a PTEF is asked, because of his/her official role, for a favour, or special access to information, meetings, etc. The European standard in this area is the [Recommendation CM/Rec \(2014\)2 on the legal regulation of lobbying activities in the context of public decision making](#).

Access to information and transparency of the law-making process are areas that have required GRECO's vigilance, despite the recommendations that countries received in the past. GRECO has recalled the overall principle of transparency of public documents and that this should be guaranteed in practice. It has been reiterated that any exceptions to the rule of public disclosure should be limited to a minimum and that outcomes of public participation procedures should be public information. Public scrutiny is also key when it comes to public procurement, in particular concerning large public contracts.

Building on the recommendations it issued in its 1<sup>st</sup> and 2<sup>nd</sup> Evaluation Rounds, GRECO returned to the issues of access to information and transparency of the law-making process in its 5<sup>th</sup> Evaluation Round. It would appear that there is still a broad margin of discretion for determining what is in the public domain and whether to exclude a certain document from free access. GRECO was concerned that some members were being restrictive in the application of Freedom of Information Acts (FoIA) requirements. Some agencies showed a certain

reluctance to disclose information, preferring rather to apply exceptions in order to withhold all or parts of information. The application of FoIA is, more often than is desirable, not consistent across government entities, which suggests the need to develop targeted training to create a more common understanding and application of the laws. In this context, GRECO has reminded countries of the standard set by [Committee of Ministers recommendation Rec\(2002\)2 on access to official documents](#), which provides *inter alia* that limitations to the right of access to official documents must be necessary in a democratic society, proportionate, and only applied if there is not an overriding interest in disclosure. Similar provisions are included in the [Council of Europe Convention on Access to Official Documents \(CETS No. 205\)](#).

GRECO has underlined the importance of facilitating early and relevant stakeholder engagement in policy/regulatory development. GRECO has also stressed the need to establish a proper legislative footprint mechanism to allow for public transparency of the evolution of texts. Implementation flaws are recurrent with regard to public consultation procedures. Legislation and practice are at variance in this domain, particularly regarding the observance of consultation timeframes and feedback processes. Timelines are frequently not respected and shortened. A repeated criticism also refers to the fact that once the draft law is made available for public consultation, it is too late in the process to make meaningful contributions to it and that it is very rare that contents are modified on the basis of public comments.

## Conflicts of interest

Managing real, potential and perceived conflicts of interest effectively is key to preventing corruption. For a majority of the countries evaluated so far, GRECO has recommended improving the management of conflicts of interest, including those arising on an ad hoc basis, in particular by clearly defining the rules and procedures that apply. It has recommended that a requirement of ad hoc disclosure be introduced in respect of persons exercising top executive functions when situations of conflict occur between their private interests and official functions. Rules about conflicts of interest should also cover political advisors.

Emphasis has been placed by GRECO on advisory, monitoring and compliance mechanisms. The system for managing conflicts of interest should be supplemented with clear provisions and guidance regarding (i) a requirement for PTEFs to disclose conflicts ad hoc, and (ii) clear procedures, responsibilities and deadlines for solving situations of conflict of interest, including following complaints by the public or by other institutions.

### Prohibition or restriction of certain activities

GRECO has assessed incompatibilities, gifts, misuse of confidential information and restriction of post-employment activities. With regard to secondary activities, many countries have been asked to review their existing rules and spell out in greater detail the activities that can be exercised by PTEFs and those which should be excluded, as well as to regulate the process for notification or requesting permission. In relation to gifts and other benefits, GRECO has reiterated the importance of strict limitations, highlighting the risk of “favours” being exchanged in situations where relations between politicians and the business community become too ‘cosy’.

Many of the countries evaluated have also been advised to improve the situation with regard to the mobility of PTEFs from the public to the private sector (the so-called “revolving-doors”), and vice-versa. For instance, GRECO has recommended developing general guidelines to address the conflicts of interest that may arise from former private activities when an individual enters government service as a top executive official, and when a person entrusted with top executive functions is negotiating a new position outside of government service if such negotiations take place before leaving public office. Attention has also been paid to cooling-off periods and their adequacy. The most common timeframe for such periods in respect of the GRECO members evaluated to date is two years. GRECO has noted that the length of the cooling-off period is less important than whether the limits are effective in preventing and managing conflicts of interest.

### Declarations of assets, income, liabilities and interests

Despite multiple attempts to introduce financial disclosure obligations as a tool of transparency, a number of deficiencies remain with regard to the scope of persons covered by this requirement, the timely publication of declarations and, most importantly, with regard to their scope and independent and systematic monitoring. All PTEFs should be subject to equivalent disclosure requirements. GRECO has recommended to almost all the countries evaluated to consider widening the scope of declarations of interests to include information on spouses and dependent family members; it being understood that such information would not necessarily need to be made public.

A formal system for review of the content of declarations of ministers and disclosures by other PTEFs should be established or enhanced and enforceable sanctions should be applied for failing to file, or knowingly making

false statements in, the disclosure reports. Furthermore, the reports filed have an additional corruption prevention value as they can be used for counselling purposes.

## Accountability and enforcement mechanisms

PTEFs should lead by example in matters of integrity. Some countries refer to political responsibility in the form of “naming and shaming” as the most effective sanction. However, GRECO does not consider that this is enough in itself and has called for the development of additional controls and sanctions in order to ensure that ethical misconduct is detected and addressed, even without media scrutiny and public or political pressure. GRECO has issued a series of recommendations relating to accountability and the enforcement of anti-corruption measures, for example to strengthen public integrity bodies and equip law enforcement with the proper means of conducting inquiries and investigations. As already mentioned, GRECO has indicated that codes of conduct for PTEFs would benefit from a robust mechanism of supervision and enforcement. It has also pointed out that the outcome of procedures undertaken in respect of persons entrusted with top executive functions should be made known to the public. In some instances, GRECO has encouraged law enforcement to be more proactive in dealing with suspected offences by PTEFs and start investigations on the basis of reasonable suspicion rather than irrefutable evidence. GRECO has reiterated recommendations given during the 1<sup>st</sup> Evaluation Round with regard to making it possible for law enforcement, subject to judicial authorisation, to use special investigative techniques.

Immunity should not result in impunity. Long after immunities were dealt with in GRECO’s 1<sup>st</sup> Evaluation Round, GRECO has issued recommendations to some countries about the standard laid down in the [Twenty Guiding Principles for the Fight against Corruption](#) stipulating that *immunities should be limited to the extent necessary in a democratic society so as not to hamper the investigation, prosecution or adjudication of corruption offences*. It goes without saying that this rule also applies to criminal investigations against PTEFs. GRECO has recommended limiting the privileges enjoyed by PTEFs with respect to prosecution for acts performed outside their official capacity and has stressed the importance of objective and fair criteria for lifting immunities.

**Law enforcement agencies** 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

Although bound by the hierarchical structure, law enforcement agencies should ensure that their investigations are independent and free from any undue political or other pressure.

Decisions affecting the career of officials can lie in the hands of superiors (e.g. regarding appointments, promotions, bonuses, medals or awards, assignments and training opportunities, authorisation of secondary activities, and also transfers and discipline). GRECO recommends streamlining procedures, placing the gathering of data at central level, and strengthening accountability, including by providing for adequate internal and external appeal channels. GRECO has also emphasised that it is imperative that superiors are able to fully understand the areas of vulnerability and set the right benchmarks for reacting to ethical challenges.

Visible leadership which consistently displays appropriate behaviour is key. Leading by example can influence in decisive ways the behaviour of subordinates, their professionalism and the organisational culture. Specific on-going training must be in place for managers so as to better equip them to provide the lead on ethics and preventing conflicts of interest and other integrity and anticorruption matters within their teams. Such training will serve both to raise awareness and to reinforce ethical practice.

## Anti-corruption and integrity policy

In a number of countries evaluated, GRECO has recommended adopting a coordinated corruption prevention and integrity policy for the police, based on the systematic and comprehensive review of risk prone areas, and to couple this with a regular assessment mechanism. In countries which were found to have well-developed

national anti-corruption strategies, codes of conduct and overall policy guidelines, several were asked to complement their codes of conduct with provisions on gifts, ad hoc conflicts of interests and relations with third parties. GRECO has also stressed that adherence to such codes should be supervised and enforced, in some cases asking for the introduction of the possibility of applying sanctions.

No enforcement of a code of conduct is possible without that code being well understood and internalised. With that in mind, for almost all countries assessed, GRECO has recommended the establishment of a mechanism for providing confidential counselling on ethical dilemmas and regular training on corruption prevention, integrity and conflicts of interests, conducted by qualified trainers, for all police staff, and notably including their superiors. GRECO has also pointed out that all preventive tools should be explained to the public so that it is aware of the integrity standards that apply to the police, and as a means of gaining trust and support.

## Organisation and accountability

To be able to perform effectively, adequate resources for law enforcement are necessary. In some instances, GRECO has had to stress to the authorities that they need to ensure appropriate and adequate remuneration for their police officers. GRECO has also been concerned in some instances that the necessary resources and expertise were not always allocated to allow for effective reforms of the police and of their internal control structures.

GRECO has stressed that the police should have sufficient operational independence in practice from the political level, i.e. the ministry in charge of police matters, and that pertinent measures should be taken to ensure that individual police officers comply in practice with the duty to implement the existing rules on integrity and impartiality in order to carry out their functions in a politically neutral manner.

## Recruitment, career and conditions of service

GRECO has recommended that the management of law enforcement careers be driven by the principles of transparent and merit-based recruitment, promotion and dismissal, offering an objective appeal procedure, having clear criteria for motivating staff and striving for gender balance. In a few instances, GRECO has recommended building on or enhancing these principles, stressing that vacancies in the police should be advertised rather than candidates being “hand-picked” by means of transfers from the civil service. GRECO has also pointed out that selection should be based on clear and objective criteria rather than subjective preferences, that no-one should unduly influence the process and that those aspiring to the highest offices should not be above this rule. Moreover, GRECO has underlined the importance of security checks at regular intervals throughout the careers of law enforcement staff as their personal circumstances are likely to change over time and, on occasion, might make them more vulnerable to corruption risks (financial problems arising for example as a result of a mortgage or consumer loan, divorce, the illness of a relative, the bankruptcy of a spouse, radicalisation, etc.). GRECO has finally recommended designing additional measures to improve gender balance at all levels and in all sectors.

## Conflicts of interest

Fairness and impartiality are paramount for all those exercising a public function; they are particularly important for law enforcement given their extensive powers. Law enforcement personnel should be proactive in dealing with their own conflicts of interest. For some countries, GRECO has recommended having a more streamlined approach in this area, with clear rules and oversight of their implementation.

## Prohibition or restriction of certain activities

The rules are stricter in some countries than others when it comes to prohibiting law enforcement staff from performing any activity other than their work functions. A few explicitly prohibit law enforcement officials from performing activities which could be to the detriment of their service in the police. In most countries evaluated, GRECO has issued a recommendation in relation to secondary employment or other activities for law enforcement.

In some cases, GRECO has recommended a streamlined system for the authorisation of secondary employment or activities, with effective follow-up. In other instances, GRECO has advised studying the issue carefully so as to be better placed to decide if additional measures are needed to limit such activity, and if so to establish clear criteria for granting permission.

GRECO has recommended considering introducing, or tightening, specific mechanisms for preventing and managing conflicts of interests after law enforcement officers leave their force, including examining the practice more thoroughly in order to limit unrestricted permissions with regard to post-employment. The lack of rules on “revolving doors” in the public sector in some countries was noted by GRECO already in the 2<sup>nd</sup> Evaluation Round. In the case of law enforcement, GRECO underlined the risks this poses to their integrity. GRECO referred to [Recommendation No. R\(2000\)10 of the Committee of Ministers to member States on Codes of Conduct for Public Officials](#), Article 26, stating that “*the public official should not take improper advantage of his or her public office to obtain the opportunity of employment outside the public service*”.

## Declaration of assets, income, liabilities and interests

Only certain countries require senior law enforcement officers to declare their assets, income, liabilities and interests. For the countries that do not use such declarations for their law enforcement officers, GRECO took the view that the need for a robust, effective and regular system of declaration for top management and/or certain at-risk positions should be analysed. Where such systems exist, GRECO has addressed recommendations targeting the system’s flaws, in particular as regards effective oversight.

## Oversight and enforcement

This topic has attracted GRECO’s close attention and recommendations have covered the development of stronger risk management systems, making sure that risks are addressed, and that oversight is in place and is effective. Preventing the risk of unauthorised access to registers and the leaking of information have been flagged. GRECO has looked at how solutions for preventing corruption risks in the police found in some countries could be useful to others. These include “multiple-eyes” procedures, greater gender mainstreaming, as well as rotation of staff in areas exposed to risks of corruption.

GRECO has been particularly concerned about the issue of the so-called “blue code” (or “wall of silence”), i.e. the informal code among law enforcement officers not to report colleagues’ misconduct or offences. GRECO believes that transparency is an essential tool for upholding public trust in the functioning of the police authority and that it is a guarantee against any public perception of self-interest or self-protection within the profession. With that in mind, a few countries have been reminded of the obligation for their police to report not just corruption but also integrity-related misconduct.

The system of investigation of public complaints should enjoy sufficient independence to guarantee its objectivity and effectiveness. GRECO has underlined the need to strengthen safeguards to ensure that follow-up of misconduct is fully and truly impartial and seen as such by the public, and sufficiently transparent.

The majority of the countries evaluated have received a recommendation regarding the protection of whistle-blowers in law enforcement, with special focus on the need to strengthen it and to provide dedicated guidance and training for all levels of the hierarchy. Whistle-blower protection is particularly important because of the above-mentioned “wall of silence” which may exist in law enforcement agencies. Most countries are in the process of upgrading their legislative frameworks for whistle-blower protection. Countries that are members of the EU are required to duly transpose the 2019 EU Directive on whistle-blower protection. Implementation in this area also remains pressing. It is important that procedures and organisational arrangements are put in place and their implementation able to effectively support whistle-blowers, in line with [Recommendation CM/Rec\(2014\)7 of the Committee of Ministers to member States on the protection of whistleblowers](#).

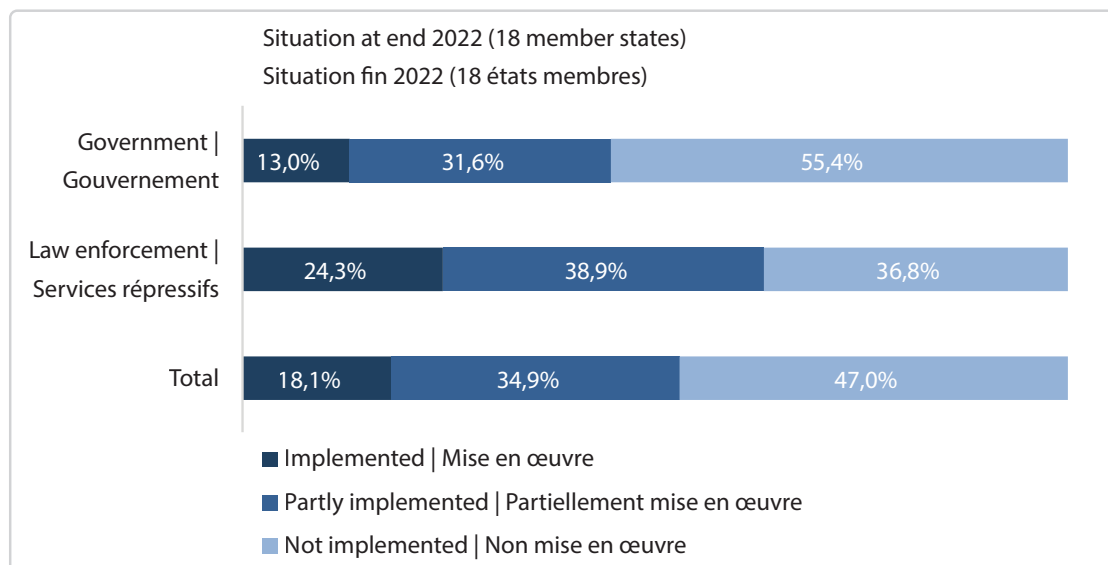
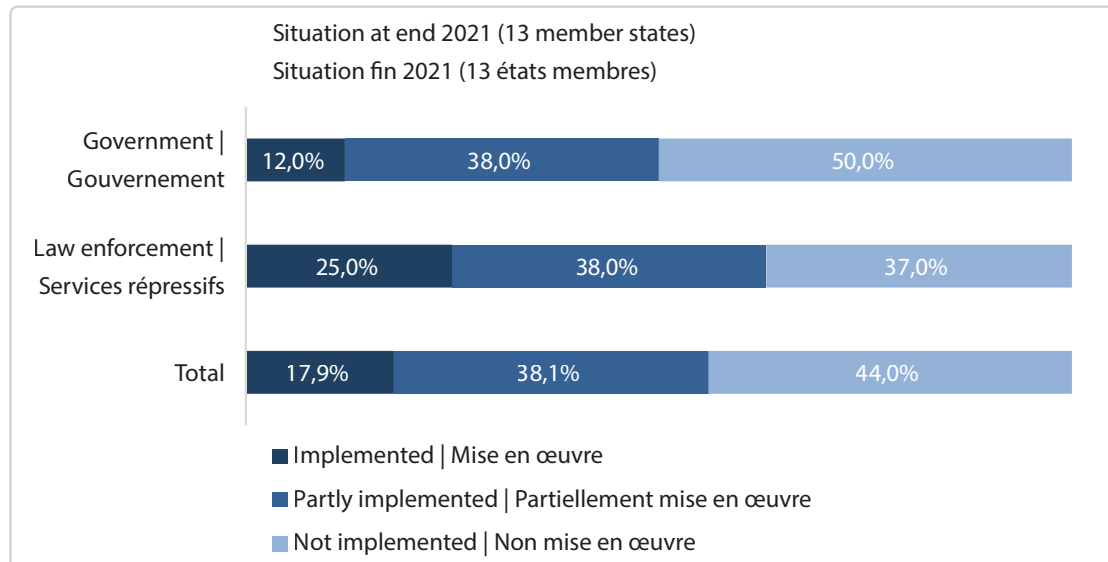
For the system to work in practice, it is crucial that whistle-blowers trust the mechanisms available for their protection; the risk arising from reporting would otherwise be too high. A legislative ban on retaliation should be coupled with workable remedies and relief for whistle-blowers. It should also provide for adequate sanctions for those who seek to retaliate. GRECO has found that more can be done to promote awareness in this area, including with a view to changing perceptions and attitudes towards protected disclosures and whistle-blowers within law enforcement agencies. To this end, training opportunities in law enforcement agencies on these matters should be intensified.

The **compliance process in the 5<sup>th</sup> Evaluation Round** continued in 2022 (see Figure 2). Through the adoption of its 5<sup>th</sup> Round compliance reports, GRECO was able to push for the implementation of a solid body of recommendations to strengthen the prevention of corruption and promote integrity in central government and law enforcement.



Figure 2 – Implementation of 5<sup>th</sup> Round recommendations by GRECO member states 2021-2022

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 2021 or 2022, respectively<sup>2</sup>.



**Gender diversity** is key in the prevention of groupthink and in turn of corruption. About a third of the questions contained in GRECO's 5<sup>th</sup> 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 by gender. One of the aims is to identify gender 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 issued a number of gender-related recommendations during its 5<sup>th</sup> Evaluation Round,

2. At end 2022, Finland, Iceland and Slovenia were considered not in sufficient compliance with GRECO's 5<sup>th</sup> Round recommendations (application of Rule 32 revised).

aiming notably at increasing the representation of women at higher levels of law enforcement agencies and ensuring their integration at all levels of those agencies.

**Communication** through traditional and social media is embedded in GRECO's work and allows information about GRECO's recommendations in every country to be widely disseminated and debated. GRECO's monitoring receives considerable media attention<sup>3</sup>. Its reports are published with the consent of the country concerned and all GRECO members adopt a practice of authorising publication. GRECO also issues a Newsletter, and its website is widely consulted.

## Selected good practice – examples from various evaluation rounds

### Reinforced internal control – Greece

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The upgraded system for internal control serves in the prevention of corruption for high officials at central level. The National Transparency Authority – established in 2019 to streamline anti-corruption policy and strengthen the national integrity and accountability framework - is involved in establishing Internal Audit Units (IAUs) in each ministry to advise ministers on improving the effectiveness of management processes and internal control procedures. The IAUs monitor systems of governance and their practical operation, ensure proper and efficient risk management processes, assure sound financial management and identify and investigate cases of misconduct.

### Business integrity - Kazakhstan

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In the context of wider reforms to improve the business climate and reduce bureaucracy for entrepreneurs, the Office of the Business Ombudsman was set up to represent businesses and entrepreneurs in relation to legitimate claims against state or sub-state entities. An Entrepreneurial Code and an Anti-Corruption Charter of Entrepreneurs have been developed to promote anti-corruption compliance in the business sector.

### Integrity requirements for persons with top executive functions - Iceland

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The guidance and monitoring role played by the Prime Minister vis-a-vis other persons with top executive functions (PTEFs), following the recent adoption of the Act on Conflicts of interest in the Government offices, has made it possible to foster a greater adherence by PTEFs to the integrity rules and to strengthen the credibility of the registration system for declarations of financial interests in respect of PTEFs. As a result of the concrete and direct action by the Prime Minister, all ministers, permanent secretaries and ministerial advisers have today de facto fulfilled their registration obligations, though there are no direct sanctions for PTEFs not fulfilling their obligations as regards the registration of assets and liabilities.

### Recruitment to the judiciary - Monaco

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In Monaco, the majority of judges and prosecutors are appointed from among French judges and prosecutors according to a specific agreement between Monaco and France. GRECO recommended ensuring greater transparency in the appointment process. In 2020, for the first time in 10 years, an appointment procedure was launched for a post within the judiciary to be filled by a Monegasque national. This procedure was organised again in 2022-2023, following the model of the one carried out in 2020. However, this second procedure could not be completed due to a lack of candidates.

### Ethics and compliance team within the National Police Department - Norway

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An ethics and compliance team set up within the National Police Department meets every month to collect and analyse information from various sources to provide guidance and assistance on ethics and corruption prevention to local police units. A blueprint has been implemented to ensure learning from experience derived from the work of the Norwegian Bureau for the Investigation of Police Affairs. All cases reviewed by the Bureau are sent to the ethics and compliance team, and cases of national interest for the police are forwarded to contact persons in the local units for follow-up. Three new questions related to ethics and anticorruption have been included in the survey of all police force employees which is carried out every two years.

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3. See <http://www.coe.int/en/web/greco/greco-in-the-media>

### **Multi-faceted judicial reform – San Marino**

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Greater guarantees for the independence of the Judicial Council have been provided, notably by excluding political membership. Measures are in place to better regulate the recruitment of magistrates (including through internal career advancement processes) and to clarify the terms for the appointment, mandate, renewal, revocation and responsibility of the head of the court. Legislative and practical initiatives are in place to improve and streamline the operation of the judicial system and to enhance the transparency of its work. A Code of Ethics for magistrates has been adopted and the objectivity and proportionality of the disciplinary system has been strengthened.

### **Disciplinary procedure for prosecutors – Spain**

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The disciplinary regime has been enhanced, establishing a procedure to determine the disciplinary responsibility and sanctions that members of the prosecution may incur for various degrees of misconduct. In cases of sexual harassment and discrimination or violence-based harassment, disciplinary action must particularly safeguard objectivity, confidentiality, swiftness and security requirements. The newly instituted Prosecutor for Disciplinary Action is tasked with initiating and conducting disciplinary proceedings. The right of the prosecutor concerned to be heard in adversarial proceedings is preserved at all times and appeal channels have been provided for, internally before the Prosecutorial Council and externally before the administrative court.

# FEATURED ARTICLE

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## The state of lobbying and influence today – recent findings and observations by the OECD

Julio BACIO TERRACINO

Head of the OECD Public Sector Integrity Division

**W**hat is the state of lobbying and influence today? When we think about lobbying, our minds may conjure up images of powerful special interest groups benefitting from privileged access to policymakers behind closed doors. And indeed, when lobbying practices are abused – such as by special interests' groups monopolising influence or using deceptive evidence to advance their own interests or unduly manipulate public opinion – public policies suffer. Similarly, when political leaders and public decision-makers use their position to take decisions favouring private interests, to the detriment of sustainable economic growth, the efficient use of economic resources and the increase of general well-being, this can foster the perception of politics as unfair and unduly influenced, perpetuate or exacerbate economic and social inequalities, and undermine citizens' trust in democratic processes. An analysis of 300 academic studies carried out by the OECD showed that such abuses have led, for example, to negative health outcomes, inaction on climate policies, excessive regulation to protect incumbents, or insufficient regulation to correct market failures or distortions.

Yet, while lobbying practices can be abused, when carried out and managed transparently and with integrity, lobbying is vital to our democracies. By sharing expertise, legitimate needs and evidence, interest groups can provide governments with valuable insights and data on which to base public policies. This can help policy makers understand options and trade-offs, and can lead, ultimately, to better policies. Lobbying to strengthen environmental standards, improve road safety or increase childcare services, for example, can benefit society as a whole.

The [OECD's 2010 Recommendation on Principles for Transparency and Integrity in Lobbying](#) was the first international standard that provided countries with guidance on fostering transparency and integrity in lobbying. We monitor how countries are implementing the Recommendation regularly, and in 2021, we shared our latest findings in the [OECD Lobbying in the 21st Century report](#). This report took stock of the progress made in implementing the lobbying principles and reflects on the increasing complexity of lobbying activities that involve new actors and new tools for influencing government.

For instance, we found that **with the rise of digital technologies and social media, lobbying has become more complex**. The traditional understanding of lobbying – as oral or written communication between a lobbyist and a public official to influence legislation, policy or administrative decisions – is no longer sufficient. Mechanisms and channels of influence have become more diverse, which can lead to abuse. Increasingly, government policies can be influenced by and through the use of social media strategies to inform, misinform or change public perceptions. This can damage trust in both governments and those influencing the policy-making process, particularly companies. To address these challenges, regulations need to redefine lobbying and influence.

The OECD also analysed how countries are advancing in terms of transparency and found that **only a minority of countries globally have addressed lobbying risks in their governance arrangements through transparency frameworks**. For example, in 2020, 23 of the 41 countries analysed provided some level of transparency over lobbying activities, either through a public registry with information on lobbying activities, and/or by requiring certain public officials to disclose information on their meetings with lobbyists through open agendas, and/or by mandating a legislative footprint to show how lobbyists' contributions were taken into account in public decision-making processes. At the same time, we also saw that improving the transparency and integrity of the public decision-making process remains high on many governments' agendas. Many countries are currently designing or considering new lobbying regulations or revising existing ones.

The report also showed that **levels of transparency vary across countries, and some of the measures in place provide only limited transparency on the influence process**. In the majority of countries, transparency is limited on both who is conducting lobbying activities and who is targeted. Certain actors that are de facto lobbyists, such as some NGOs and think tanks, are not always covered by transparency requirements. Moreover, despite the growing risks attributed to non-transparent foreign influence, only three OECD

members (Australia, Canada, the United States) and the EU (for activities targeting the European Commission, the European Parliament and the Council of the EU) provide some level of transparency on the influence of foreign governments through lobbying activities, even though gaps remain to be bridged in these legislative and institutional frameworks in order to effectively address foreign interference risks. Over the past year, we have seen more take-up on this issue, with countries like the United Kingdom exploring legislation to enhance transparency around foreign influence, and many others discussing the risks such influence can pose to democratic processes. Finally, we found that few countries provide some transparency on lobbying activities in all branches of government, and transparency remains the exception at subnational levels.

**Beyond a need for more transparency on the “who”, the OECD report also found that more transparency is needed on the “how”, such as who funds research, think tanks and grassroots organisations, as well as on the use of social media as a lobbying tool.** Currently, only one country and the EU provide a level of transparency beyond traditional lobbying activities: Canada in its Canadian Register of Lobbyists and the European Union through the EU Transparency Register. Both registers require lobbyists to disclose information on the use of social media and other public relations campaigns as a lobbying tool. Political finance can also be used as a mechanism of influence. While transparency of political finance is high, some grey areas remain, such as the funding of digital advertisements for political parties and candidates, and the political activities of third parties.

**Beyond transparency, the strength and effectiveness of the policy-making process also depends on the integrity of both public officials and those who try to influence them.** Addressing lobbying-related risks is not only a legal issue: the moral compass of elected and appointed public officials may fail, even when a strong legal framework is in place and even if they want to behave ethically. Our report found that while rules on gifts, invitations and hospitality are robust, few countries have standards, guidance and training that specifically address lobbying activities and other influence practices. The “revolving door” between private and public office also remains a major concern, despite strict standards for managing conflict of interests. For example, only a few countries provide cooling-off periods for members of the legislative branch.

**Lobbyists and companies are also under increasing scrutiny and need a clearer integrity framework for engaging with the policy-making process.** While codes of conduct remain the main tool for supporting integrity for lobbyists, they can lack coherence or leave too much room for interpretation. It is essential to improve standards and guidance across the range of measures that are available to influence public policy, to help lobbyists and companies engage in a way that does not raise concerns over integrity and inclusiveness. In particular, it may be necessary to specify the due diligence companies should undertake to ensure that their lobbying activities are aligned with their sustainability commitments.

## Spotlight: the effects of the COVID-19 crisis on lobbying and influence

The COVID-19 crisis highlighted governments’ vulnerability to undue influence around the world. Reports show that lobbying activities related to the pandemic increased significantly in the early months of the crisis. Increased involvement in government regulation by businesses and stakeholders most affected by the crisis was to be expected, however not all affected stakeholders had the opportunity to effectively influence the actions of their governments. For instance, in the first months of the pandemic, with most face-to-face meetings postponed, stakeholders with previous connections to decision makers in government had an advantage over lobbyists with fewer connections, and more established lobbyists were able to influence early policy decisions.

Concerns also arose over the influence of powerful interest groups on other COVID-19-related policies, such as vaccine purchases,<sup>4</sup> and a lack of transparency in response to access to information requests that could have shed light on the influence of powerful interest groups in key decision-making processes. These findings echo what we saw in previous crises, where the imbalance in influence by affected businesses and stakeholders had an impact on effective policy responses.

Moreover, in response to the many areas of governance affected by the pandemic, many governments established ad hoc procedures to provide scientific and technical expertise in guiding policy responses and recovery plans.<sup>5</sup> While these appointed experts can provide credible information and legitimacy to the crisis

4. EU Court of Auditors (2022), Special report 19/2022: EU COVID-19 vaccine procurement – Sufficient doses secured after initial challenges, but performance of the process not sufficiently assessed, <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=61899>

5. OECD (2020), “Building resilience from the centre: The role of the centres of government in managing the Coronavirus (COVID-19) crises and preparing for the aftermath”, OECD Policy Responses to Coronavirus (COVID-19), <https://www.oecd.org/coronavirus/policy-responses/building-resilience-to-the-covid-19-pandemic-the-role-of-centres-of-government-883d2961/>

response processes, they also pose an integrity risk. These risks include unmanaged conflicts of interest, as well as an uneven distribution of interests in the expert groups. We learned from the crisis that while rapid responses were vital, core governance principles of integrity, transparency and inclusivity were also essential to safeguard decision-making.

In short, the crisis revealed weaknesses in lobbying frameworks, including the inequity of influence and undue influence, but also highlighted that countries with stronger regulatory frameworks on transparency in lobbying activities and policy-making enjoyed greater transparency in their policy responses to the crisis.

### **Transparency and integrity in lobbying and influence: the way forward**

The perspective from the OECD is that lobbying and influence should not be restricted, but rather enabled in the context of a legal framework where lobbying is clearly defined and enables transparency and integrity. To remain fit-for-purpose for the coming decades, this framework needs to recognise that the methods of influence have evolved as more actors are stepping into the sphere of lobbying and influence. To support countries in adapting to this changing landscape, the OECD is updating its 2010 Recommendation on Principles for Transparency and Integrity in Lobbying to more closely reflect these changes and guide efforts by governments, business and civil society to reinforce transparency and integrity in policy-making.

Through this process, we continue to count on GRECO as a key counterpart. The findings of the OECD on these issues and the observations and recommendations developed by GRECO on lobbying and transparency in central government and law enforcement under its 5<sup>th</sup> Evaluation Round are clearly mutually reinforcing and provide extensive guidance for States to adapt their laws, policy and practice to meet the international standards they are bound by. We are pleased that GRECO has also consistently engaged in other areas of the OECD's integrity agenda, notably through regular participation in the OECD's Working Party of Senior Public Integrity Officials and core flagships, like our lobbying report, but also the [OECD Public Integrity Indicators](#) and the [OECD Public Integrity Handbook](#). The international integrity and anti-corruption agenda has greatly benefitted from this regular sharing of good practices and lessons learned, and we look forward to continuing the collaboration in the years ahead.

# FRAMEWORK FOR GRECO'S ONGOING WORK

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## 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. 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 – the invitation is valid for 5 years. 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 5 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) and three have not yet ratified the Additional Protocol to the Criminal Law Convention on Corruption (ETS No. 191).

It is regrettable that at end 2022, 14 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 (eight) 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>

The treaties are complemented by the following legal instruments:

- ▶ **Twenty Guiding Principles** for the fight against Corruption (Committee of Ministers Resolution (97) 24)
- ▶ Recommendation on **Codes of Conduct for Public Officials** (including a model code) (Committee of Ministers recommendation to member States No. R(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)
- ▶ 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)
- ▶ 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

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.

### Methodology – 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 5<sup>th</sup> 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 (4<sup>th</sup> Round) or who have been found not to be in sufficient compliance with GRECO's recommendations (5<sup>th</sup> 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.

### Evaluation Rounds<sup>6</sup>

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.

**5<sup>th</sup> Evaluation Round** (launched on 1 January 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

6. See <https://www.coe.int/en/web/greco/evaluations>



- ▶ 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

#### **4<sup>th</sup> 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)

#### **3<sup>rd</sup> 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

#### **2<sup>nd</sup> 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

### **1<sup>st</sup> 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 1<sup>st</sup> and 2<sup>nd</sup> Round Evaluations*.

In December 2022 at its 92<sup>nd</sup> Plenary Meeting, GRECO held a first open discussion on the possible thematic focus of its 6<sup>th</sup> Evaluation Round. This constitutes the first stage of GRECO's in-depth preparation for its future work.

### **Publication of reports**

The long-standing practice whereby GRECO member states lift the confidentiality of reports shortly after their adoption and translate them into the national languages is extremely important. Raising awareness of GRECO's findings across society in this way prompts national debate and support for the implementation of its recommendations. The release of a report for publication is co-ordinated with the member state concerned and the Directorate of Communication of the Council of Europe to maximise media attention; this helps raise awareness in society and the institutions concerned about the expected reforms, which can in turn contribute to increasing support for their adoption and implementation.

# 5<sup>TH</sup> EVALUATION ROUND - PARAMETERS

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The ongoing 5<sup>th</sup> 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 4<sup>th</sup> 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 5<sup>th</sup> 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,<sup>7</sup> 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 5<sup>th</sup> 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.<sup>8</sup> 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 4<sup>th</sup> 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.

# GOVERNING STRUCTURES AND MANAGEMENT

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**T**he 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. The position of President and Vice-President for the 5<sup>th</sup> Evaluation Round were taken up, in January 2017, by Marin MRČELA, Justice of the Supreme Court of Croatia and, in December 2019, by Monika OLSSON, Director of the Division for Criminal Law of the Ministry of Justice of Sweden, respectively. In 2022, the Bureau was composed of the President, Vice-President, and Panagiota VATIKALOU, Presiding Judge, Head of the First Instance Court of Chania (Greece); António DELICADO, Ministry of Justice (Portugal); Vita HABJAN BARBORIČ, Commission for the Prevention of Corruption (Slovenia); Olivier GONIN, Federal Office of Justice (Switzerland) and David MEYER, Ministry of Justice (United Kingdom).<sup>9</sup>

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 2022: Belarus,<sup>10</sup> 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. In 2022, the Statutory Committee, presided by Nina NORDSTRÖM, Ambassador Extraordinary and Plenipotentiary, Permanent Representative of Finland to the Council of Europe, adopted GRECO's Budget for 2023.

## Secretariat

The Secretariat, headed in 2022 by Hanne JUNCHER, Executive Secretary, 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).

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9. Aslan YUSUFOV, Prosecutor General's Office (Russian Federation) was a member of the Bureau until the Russian Federation's participation in the work of GRECO was limited by the [decision of the Committee of Ministers of the Council of Europe of 23 March 2022](#).

10. Belarus's representation was limited as per the [decision of the Committee of Ministers of the Council of Europe of 17 March 2022](#).



On-site visit – Türkiye



On-site visit – Austria



Exchange of Views with the World Justice Project (WJP – Rule of Law Index)

Exchange of views with the International Partnership against Corruption in Sport (IPACS)

# APPENDICES

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## Appendix 1 – GRECO’s Mission

**T**he 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

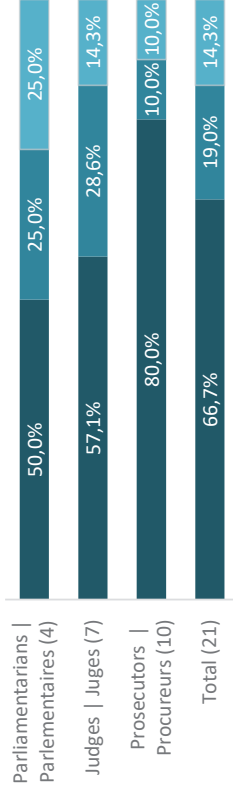
The tables presented here offer a visual representation of the state of implementation of GRECO's recommendations in respect of its member states individually. The statistics are not intended to be the basis of any ranking or direct comparison between countries when it comes to compliance with GRECO's 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 2022 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.

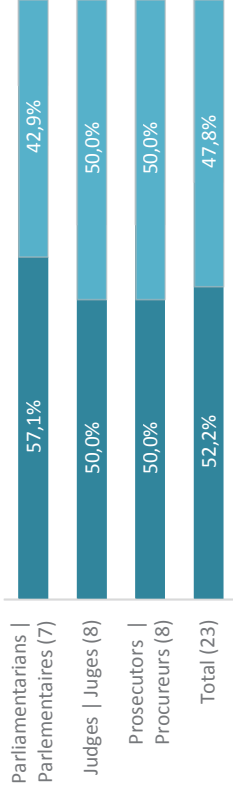
### 4<sup>th</sup> Evaluation Round – Prevention of corruption in respect of members of parliament, judges and prosecutors



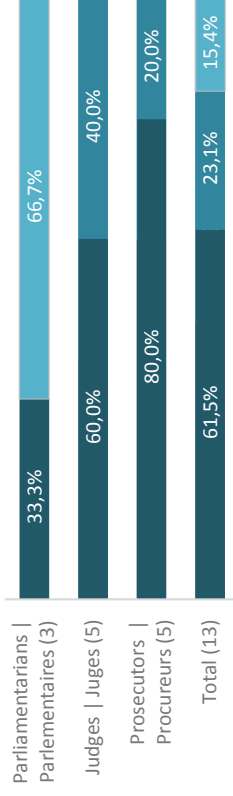
Azerbaijan | Azerbaïdjan (2020)\*



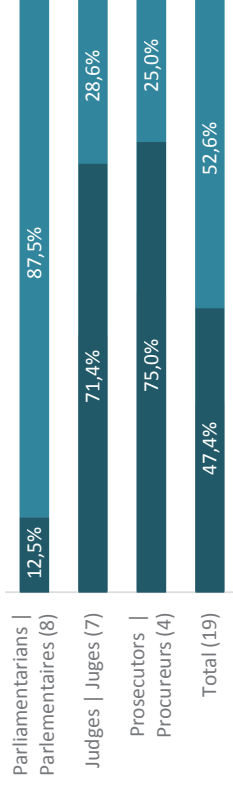
Bosnia and Herzegovina | Bosnie-Herzégovine (2021)



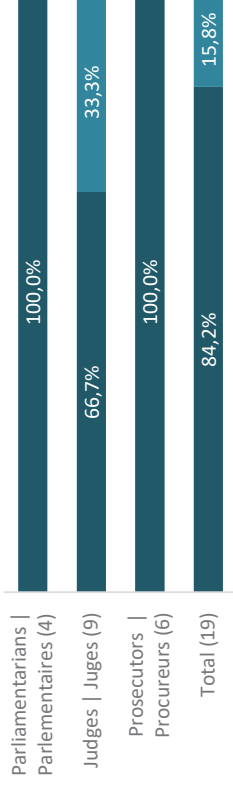
Croatia | Croatie (2022)\*



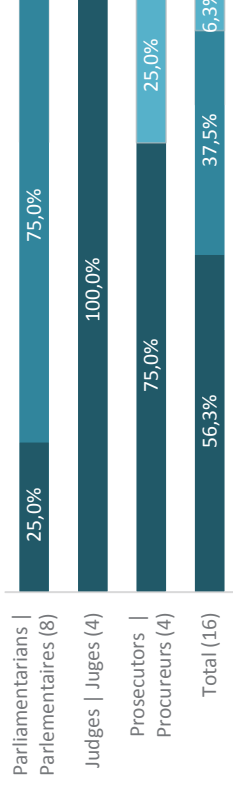
Belgium | Belgique (2022)



Bulgaria | Bulgarie (2020)\*

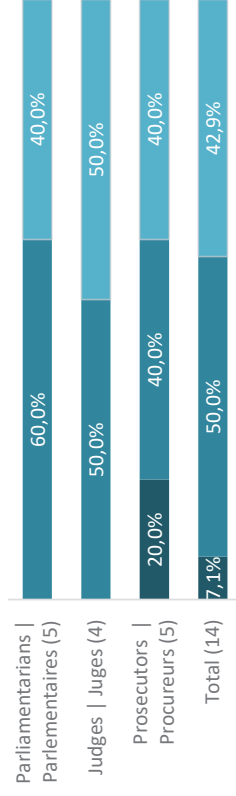


Cyprus | Chypre (2022)





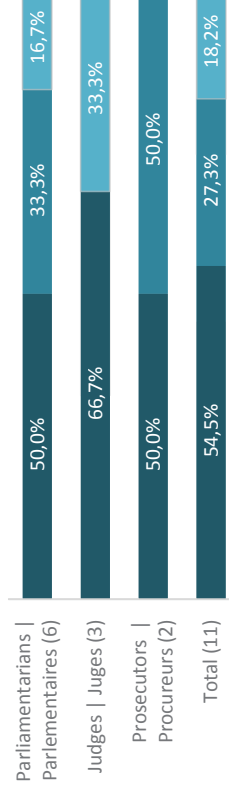
Czech Republic | République tchèque (2019)



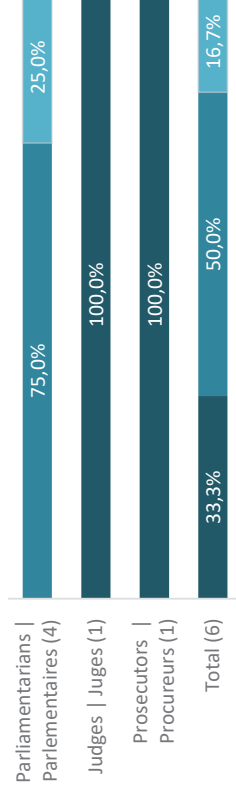
Estonia | Estonie (2017)\*



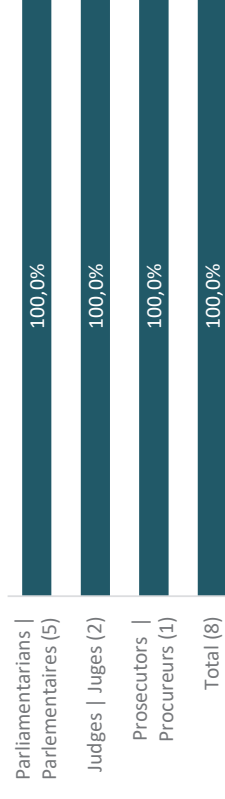
France (2022)



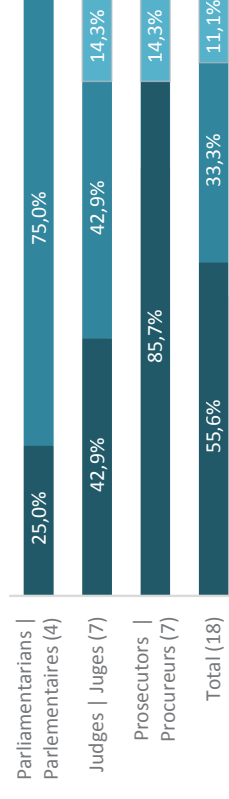
Denmark | Danemark (2021)



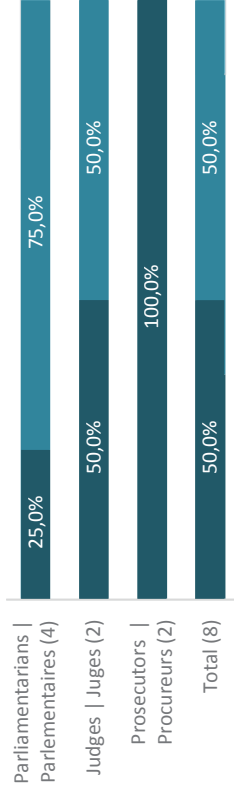
Finland | Finlande (2017)\*



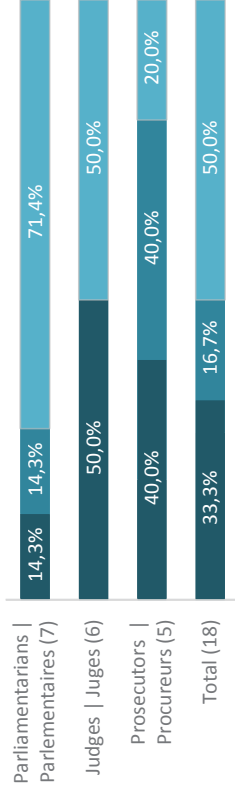
Georgia | Géorgie (2022)



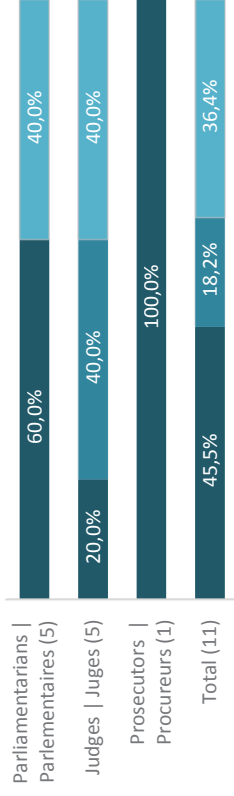
Germany | Allemagne (2022)



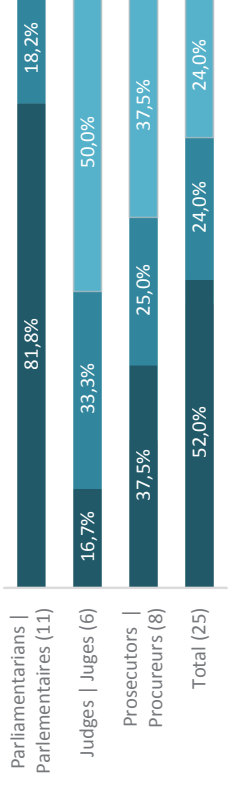
Hungary | Hongrie (2021)



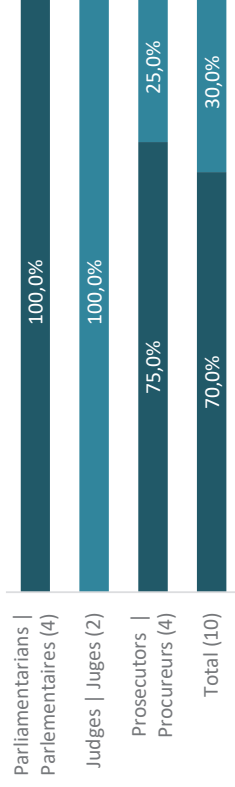
Ireland | Irlande (2022)



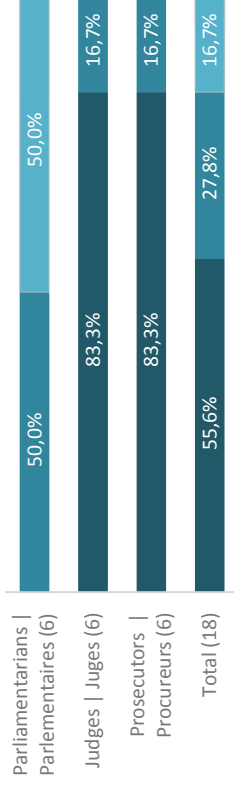
Greece | Grèce (2022)



Iceland | Islande (2021)\*

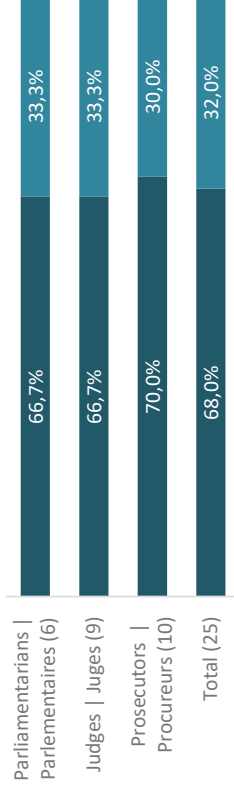


Italy | Italie (2022)

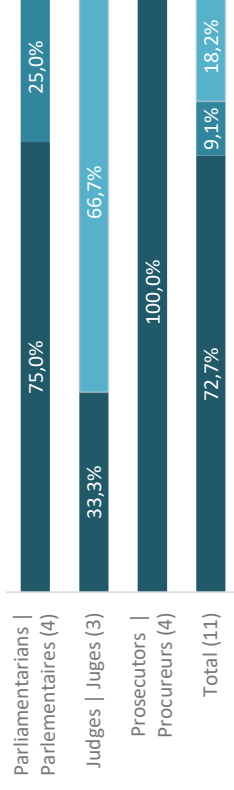




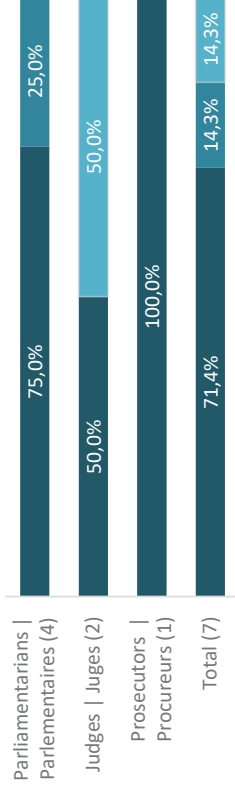
### Monaco (2021)



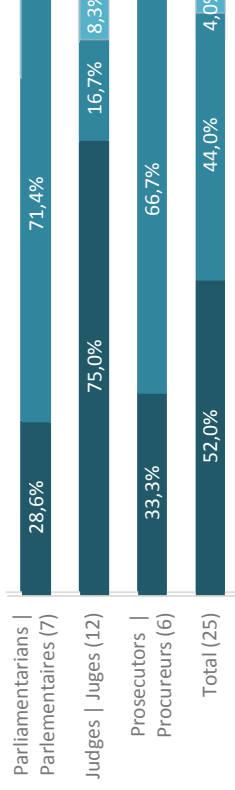
### Montenegro | Monténégro (2019)\*



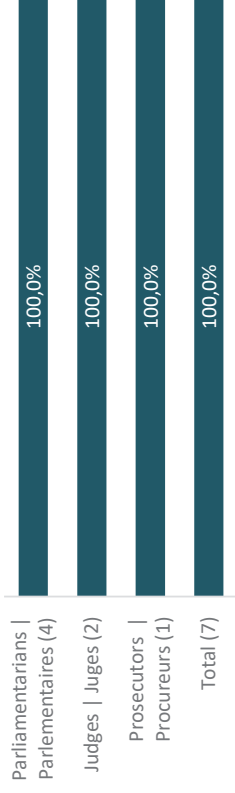
### Netherlands | Pays-Bas (2021)\*



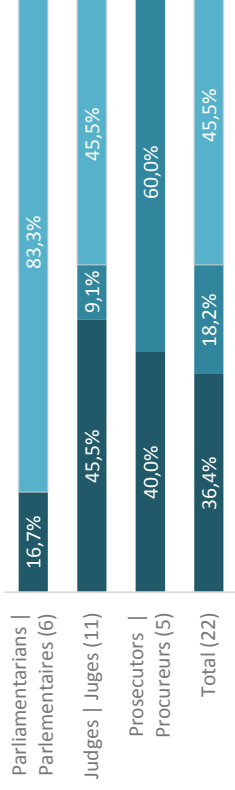
### North Macedonia | Macédoine du Nord (2022)



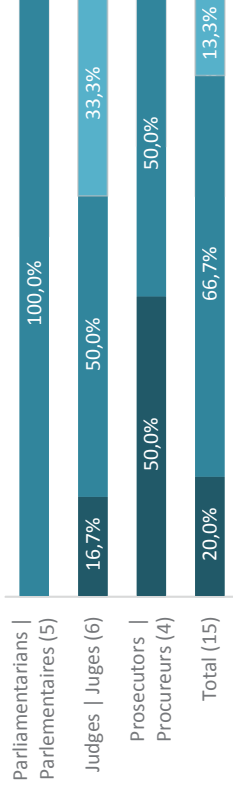
### Norway | Norvège (2019)\*



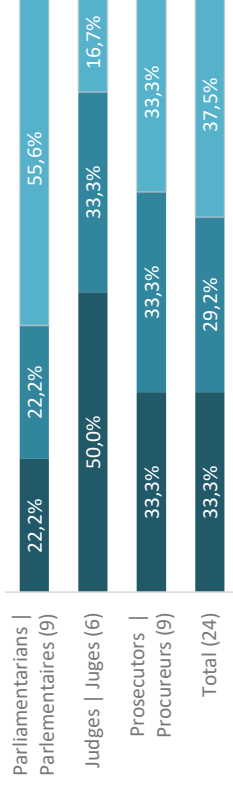
### Poland | Pologne (2021)



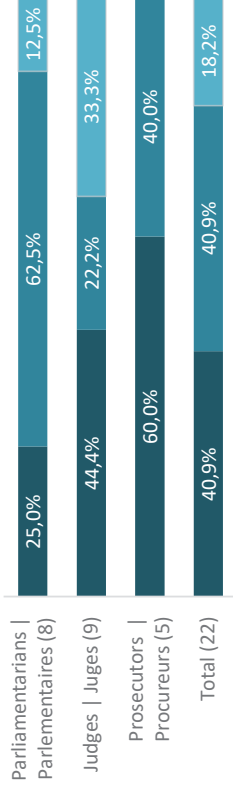
Portugal (2022)



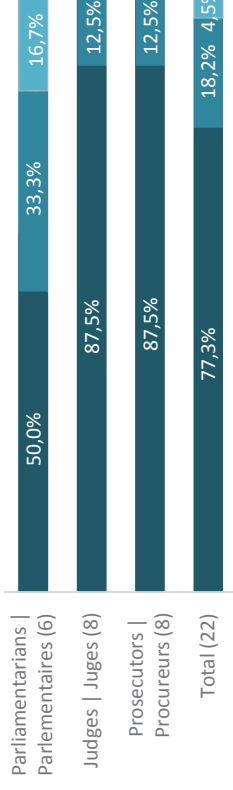
Romania | Roumanie (2021)



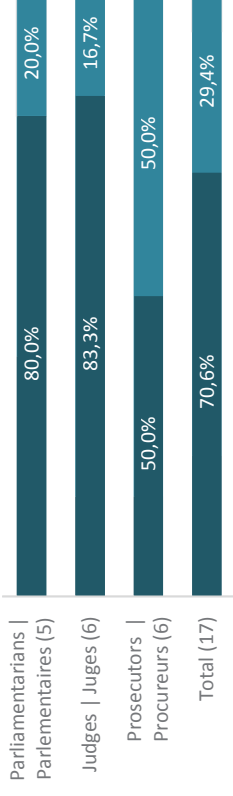
Russian Federation | Fédération de Russie (2019)



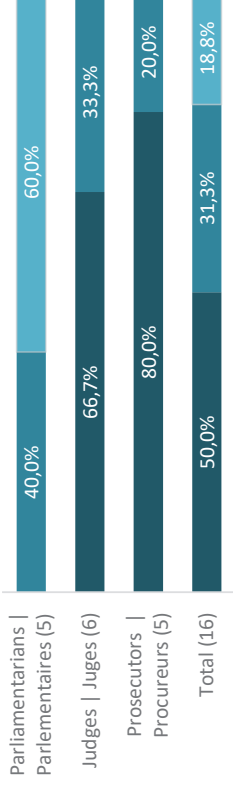
San Marino | Saint-Marin (2022)



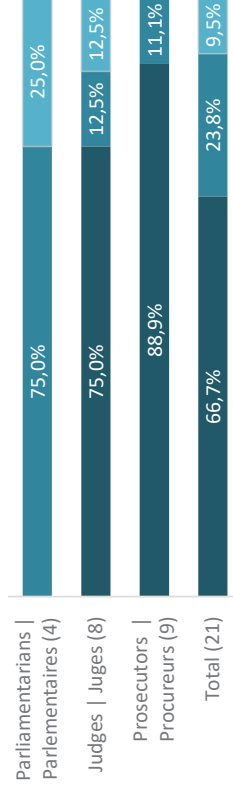
Serbia | Serbie (2022)



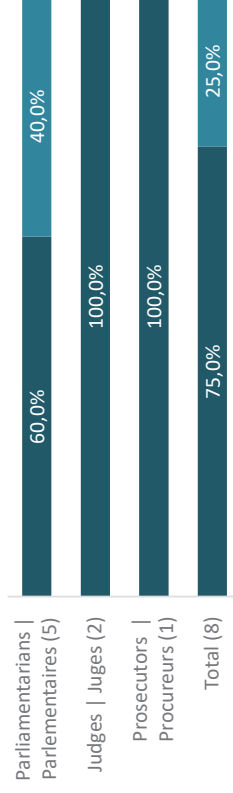
Slovak Republic | République slovaque (2020)\*



Slovenia | Slovénie (2018)\*



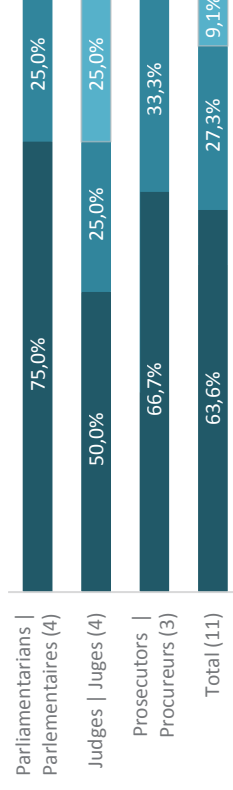
Sweden | Suède (2017)\*



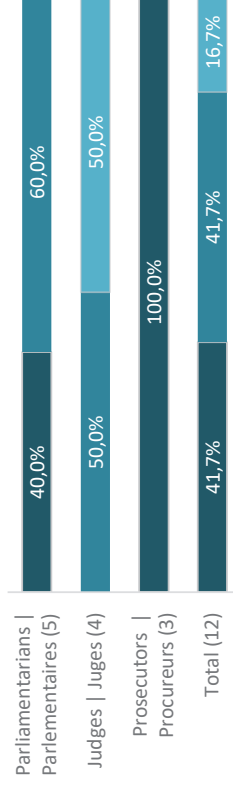
Türkiye (2022)



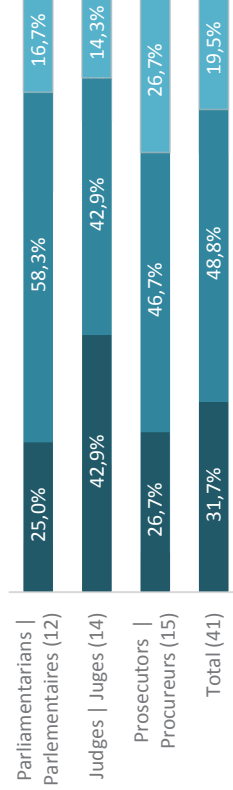
Spain | Espagne (2022)

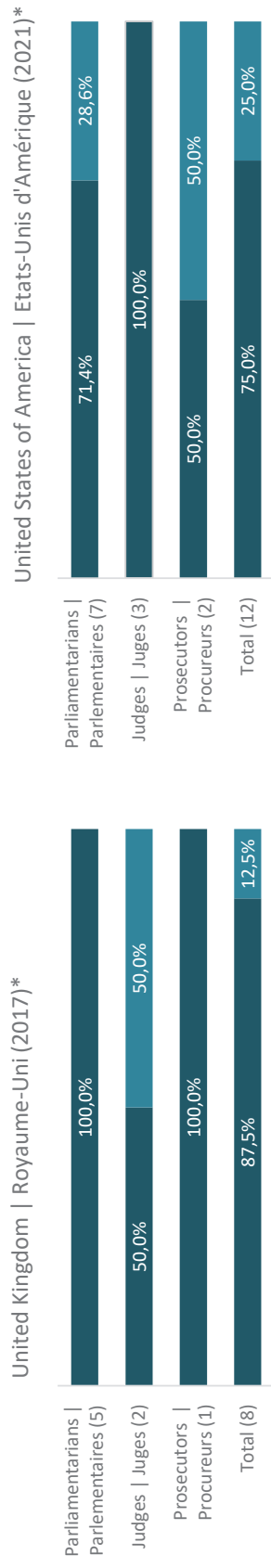


Switzerland | Suisse (2021)

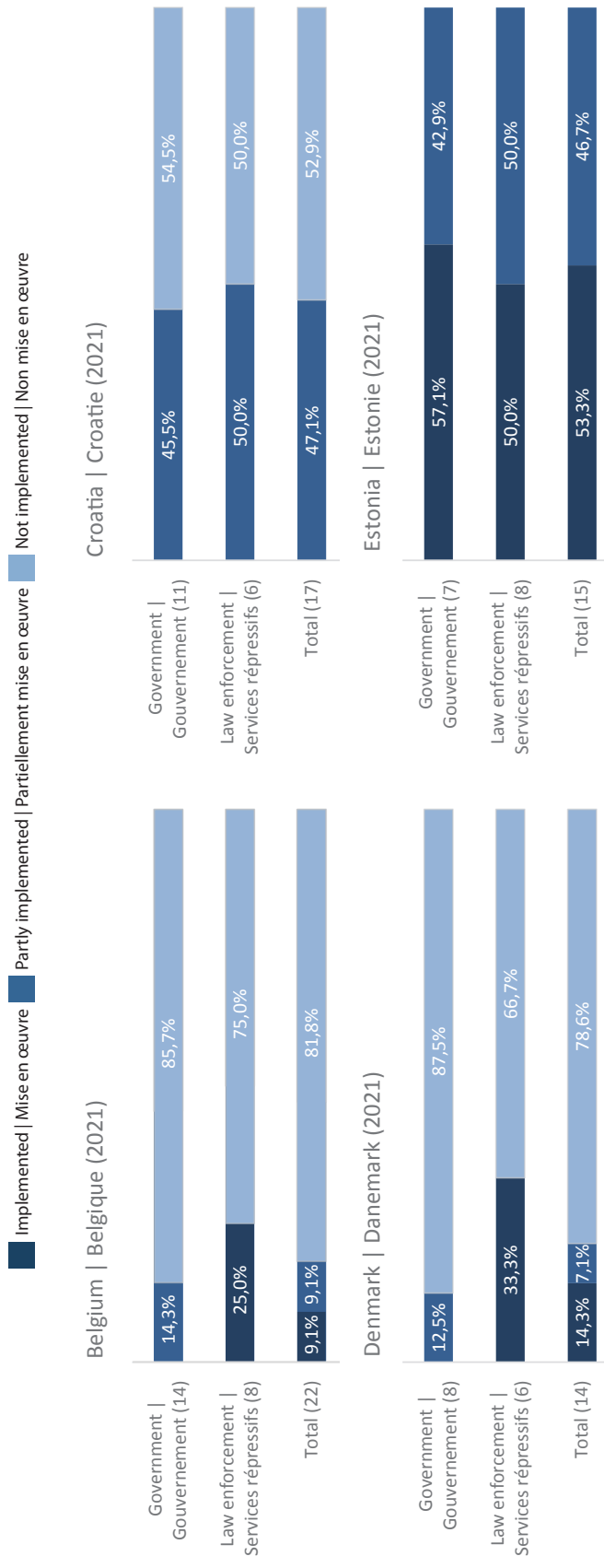


Ukraine (2021)

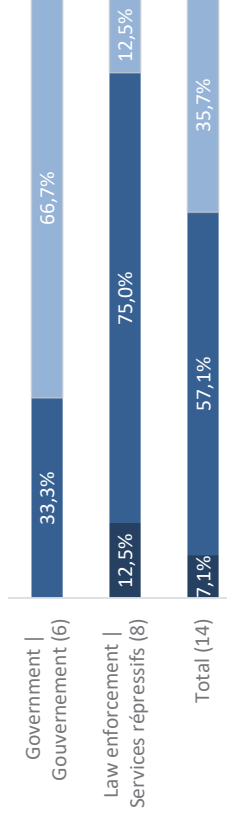




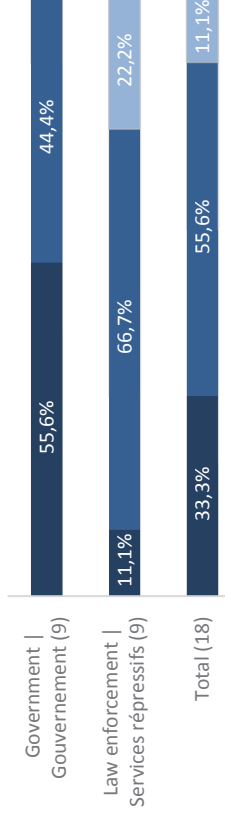
### 5th Evaluation Round – Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies



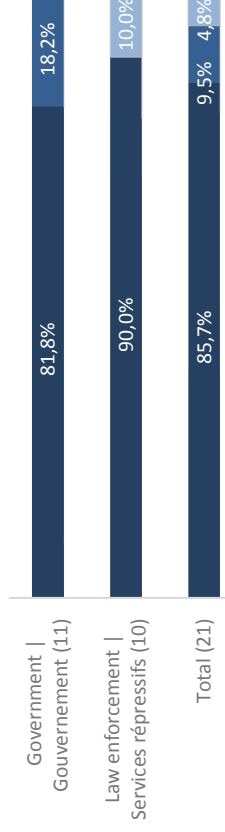
Finland | Finlande (2020)



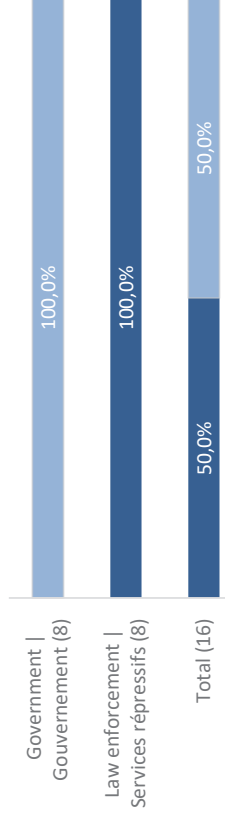
Iceland | Islande (2022)



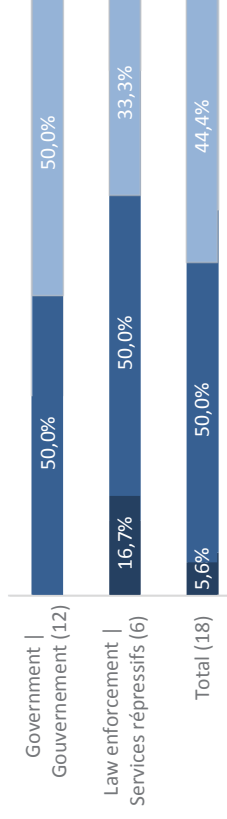
Luxembourg (2022)\*



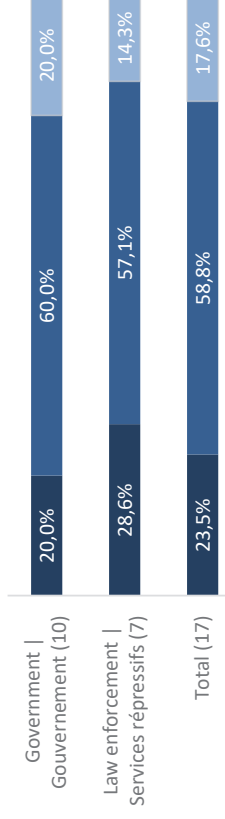
Netherlands | Pays-Bas (2021)



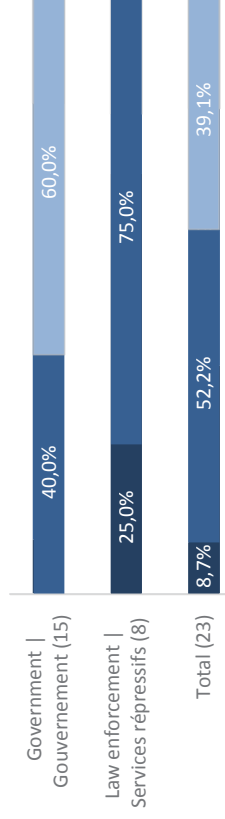
France (2021)



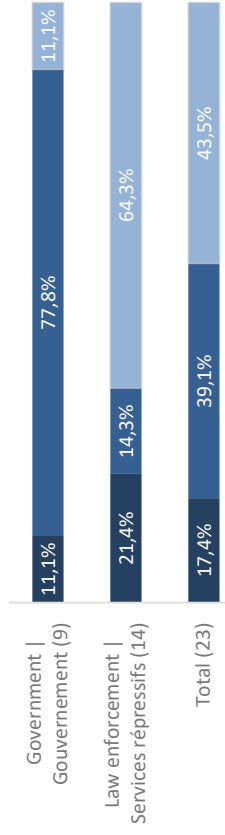
Latvia | Lettonie (2020)



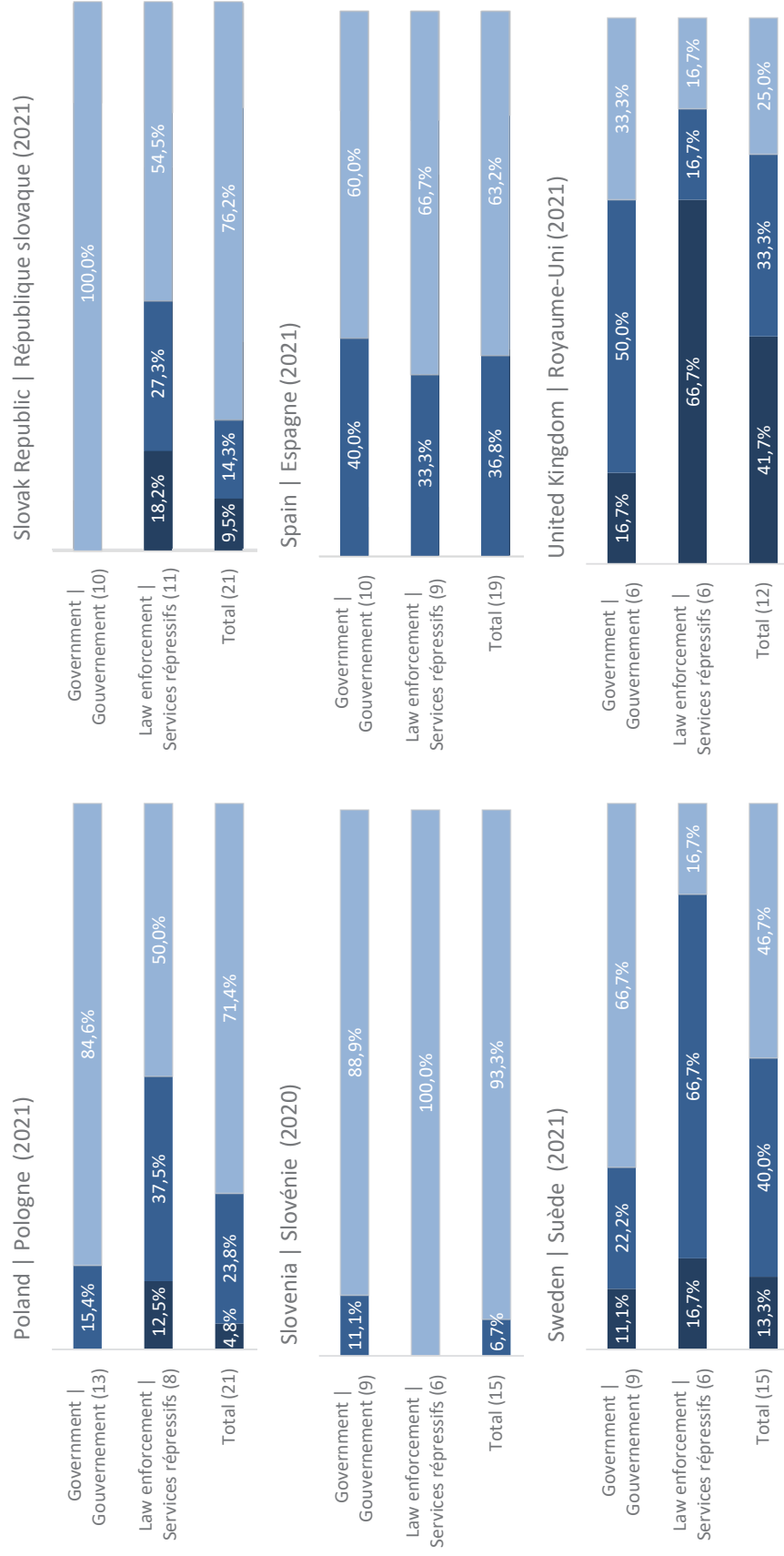
Malta | Malte (2021)



North Macedonia | Macédoine du Nord (2021)







## Appendix 3 – Core programme (2022)

### On-site evaluation visits in 2022

#### 5<sup>th</sup> Evaluation Round

- ▶ Bulgaria (30 May - 3 June)
- ▶ Austria (20-24 June)
- ▶ Bosnia and Herzegovina (20-24 June)
- ▶ Portugal (27 June - 1 July)
- ▶ Azerbaijan (26-30 September)
- ▶ Türkiye (3-7 October)
- ▶ Romania (31 October – 4 November)
- ▶ Czech Republic (21-25 November)
- ▶ Cyprus (12-16 December)

### Meetings in 2022

#### GRECO Plenary

- ▶ GRECO 90 (21-25 March)
- ▶ GRECO 91 (13-17 June)
  - Exchange of views with the International Partnership against Corruption in Sport (IPACS), represented by Pâquerette GIRARD ZAPPELLI, IPACS Vice-President (International Olympic Committee -IOC), Giuseppe DELEONARDIS, Head of Compliance, Risk and Internal Controls (IOC), and Konstantina OROLOGOPOULOU, IPACS and Governance Coordinator (IOC)
- ▶ GRECO 92 (28 November - 2 December)
  - Exchange of views on corruption perception measuring Indices, bringing together: the World Justice Project - Rule of Law Index - represented by Elizabeth ANDERSEN, Executive Director, and Transparency International - Corruption Perceptions Index - represented by Roberto Martinez B KUKUTSCHKA, Research Expert - Corruption Measurement

#### GRECO Bureau

- ▶ Bureau 98 (1 March)
- ▶ Bureau 99 (23 May)
- ▶ Bureau 100 (3 November)

#### GRECO Statutory Committee

- ▶ 31<sup>st</sup> Meeting – Adoption Budget 2023 (5 October)

### Evaluation reports adopted in 2022

#### 5<sup>th</sup> Evaluation Round

- ▶ Austria
- ▶ Bosnia and Herzegovina
- ▶ Bulgaria
- ▶ Hungary
- ▶ Ireland
- ▶ Montenegro
- ▶ Serbia

#### Joint 1<sup>st</sup> and 2<sup>nd</sup> Evaluation Rounds

- ▶ Kazakhstan

## Compliance reports adopted in 2022

### 5<sup>th</sup> Evaluation Round compliance procedure

- ▶ Albania, Germany, Norway – procedures on-going
- ▶ Latvia, Luxembourg – procedures closed

#### *Rule 32 revised procedures – insufficient compliance*

- ▶ Finland, Iceland, Slovenia – procedures opened

### 4<sup>th</sup> Evaluation Round compliance procedure

- ▶ Cyprus, France, Georgia, Greece, Ireland, Italy, North Macedonia, San Marino, Spain, Switzerland – procedures on-going
- ▶ Croatia, Malta – procedures closed

#### *Rule 32 procedures – globally unsatisfactory compliance*

- ▶ Liechtenstein, Portugal – procedures opened
- ▶ Türkiye – procedures maintained
- ▶ Belgium, Germany, Luxembourg, Romania (incorporating Rule 34 follow-up), Serbia – procedures closed

### 3<sup>rd</sup> Evaluation Round compliance procedure

- ▶ Switzerland – procedures on-going
- ▶ Bosnia and Herzegovina, Denmark – procedures closed

## Appendix 4 – GRECO delegations (2022)

### GRECO MEMBER STATES/ÉTATS MEMBRES DU GRECO (at/au 22/12/2022)

#### ALBANIA/ALBANIE

Ms Adea PIRDENI (Head of delegation)  
Deputy Minister  
Ministry of Justice

*Substitut/e*

Mr Ismail SHEHU  
Director General  
General Directorate of Programs and Projects in the  
field of Anticorruption  
Ministry of Justice

*Substitut/e*

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

#### ANDORRA/ANDORRE

Mme Eva GARCIA LLUELLES (Chef de délégation)  
Ministère de la Justice et de l'Intérieur  
Relations et coopération internationales dans le  
domaine juridique

*Substitut/e*

Ms Aida GARNICA BARCO  
Legal adviser  
Ministry of Justice and Interior

#### ARMENIA/ARMÉNIE

Ms Nvard VARDANYAN (Head of delegation)  
Deputy Secretary General  
Ministry of Justice

Ms Kristine GABUZYAN  
Head of the Anti-Corruption Policy Development and  
Monitoring Department  
Ministry of justice

*Substitut/e*

Ms Hasmik TIGRANYAN  
Head of the Monitoring Division  
Anti-Corruption Policy Development and  
Monitoring Department  
Ministry of Justice

#### AUSTRIA/AUTRICHE

Mr Christian MANQUET (Head of delegation)  
Head of Department for Criminal Law  
Federal Ministry of Justice

Ms Caroline BACHER  
Public Prosecutor  
Federal Ministry of Justice

*Substitut/e*

Mr Ernst SCHMID  
Acting Head of Department Resources, Support and  
Legal Affairs  
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/AZERBAÏDJAN

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

Mr Ramin VALIZADA  
Executive Secretary  
Azerbaijan Anti-Corruption Commission

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

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

## **BELARUS**

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Representation limited as per the [decision](#) of the Committee of Ministers of 17 March 2022  
Représentation limitée selon la [décision](#) du Comité des Ministres du 17 mars 2022

## **BELGIUM/BELGIQUE**

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M. Carl PIRON (Chef de délégation)  
Attaché au Service de la Politique Criminelle  
DG Législation, Libertés et Droits Fondamentaux  
Service Public Fédéral Justice (SPF Justice)

M. Jeroen CLARISSE  
Conseiller aux affaires juridiques de la Chambre des  
représentants  
Parlement fédéral  
Palais de la Nation

## **BOSNIA AND HERZEGOVINA/BOSNIE-HERZÉGOVINE**

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

Mr Nenad EŠPEK  
Expert Associate for Combating crime committed  
through information and communication  
technologies and copyright protection  
Section for Combating Organized Crime & Corruption  
Ministry of Security

## **BULGARIA/BULGARIE**

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Mr Georgi RUPCHEV (Head of delegation)  
Counsellor, Justice Unit  
Permanent Representation of Bulgaria to the EU

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

## **CROATIA/CROATIE**

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Mr Marin MRČELA  
**President of GRECO / Président du GRECO**  
Justice of the Supreme Court

Mr Dražen JELENIĆ (Head of delegation)  
Deputy State Attorney General

*Substitut/e*  
Ms Tamara ŠURINA  
Head of Sector  
Sector for Prevention of Corruption  
Directorate for European Affairs,  
International and Judicial Cooperation and Preven-  
tion of Corruption  
Ministry of Justice and Administration

*Substitut/e*  
Mr Krësimir SIKAVICA  
Head of Sector  
Criminal Intelligence Sector  
Criminal Police Directorate  
General Police Directorate  
Ministry of the Interior

## **CYPRUS/CHYPRE**

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

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

*Substitut/e*

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**CZECH REPUBLIC/REPUBLIQUE TCHÈQUE**

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**DENMARK/DANEMARK**

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**ESTONIA/ESTONIE**

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**FINLAND/FINLANDE**

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## FRANCE

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## GEORGIA/GÉORGIE

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## KAZAKHSTAN

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## LIECHTENSTEIN

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## LUXEMBOURG

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## MONACO

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*Substitut/e*

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## MONTENEGRO/MONTÉNÉGR

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## NORTH MACEDONIA/MACÉDOINE DU NORD

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## NORWAY/NORVÈGE

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## PORTUGAL

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*Substitut/e*

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Superior Council of Magistracy

## RUSSIAN FEDERATION/FÉDÉRATION DE RUSSIE

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Participation limited as per the [decision](#) of the Committee of Ministers of 23 March 2022  
Participation limitée selon la [décision](#) du Comité des Ministres du 23 mars 2022

## SAN MARINO/SAINT-MARIN

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## SERBIA/SERBIE

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## SPAIN/ESPAGNE

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## SWEDEN/SUÈDE

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## TÜRKİYE

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## UKRAINE

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## UNITED KINGDOM/ROYAUME-UNI

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## UNITED STATES OF AMERICA/ÉTATS-UNIS D'AMÉRIQUE

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## COUNCIL OF EUROPE/CONSEIL DE L'EUROPE

### GRECO'S STATUTORY COMMITTEE/COMITÉ STATUTAIRE DU GRECO

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**President of GRECO's Statutory Committee**

**PARLIAMENTARY ASSEMBLY OF THE COUNCIL OF EUROPE (PACE)/  
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Mr Kamal JAFAROV  
(Azerbaijan – Committee on Legal Affairs and Human Rights)

**EUROPEAN COMMITTEE ON LEGAL COOPERATION/COMITÉ EUROPEEN DE COOPERATION JURIDIQUE (CDCJ)**

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*No nomination*

*Pas de nomination*

**EUROPEAN COMMITTEE ON CRIME PROBLEMS/COMITÉ EUROPÉEN POUR LES PROBLÈMES CRIMINELS (CDPC)**

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*No nomination*

*Pas de nomination*

**COUNCIL OF EUROPE DEVELOPMENT BANK/BANQUE DE DÉVELOPPEMENT DU CONSEIL DE L'EUROPE (CEB)**

---

Ms Katherine DELIKOURA  
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**OBSERVERS/OBSERVATEURS**

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Ms Tanya KHAVANSKA  
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**UNITED NATIONS, REPRESENTED BY THE UN OFFICE ON DRUGS AND CRIME (UNODC)/  
NATIONS UNIES, REPRÉSENTÉES PAR L'OFFICE DES NATIONS UNIES CONTRE LA DROGUE ET LE CRIME (ONUDC)**

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Corruption and Economic Crime Branch

**INTERNATIONAL ANTI-CORRUPTION ACADEMY/  
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Dean and Executive Secretary

Mr Jaroslaw PIETRUSIEWICZ  
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**EUROPEAN UNION/UNION EUROPÉENNE**

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*Substitut/e*  
Mr Per IBOLD  
Deputy, Minister Counsellor  
European Union Delegation to the Council of Europe

## Appendix 5 – Contacts and outreach (2022)

### GRECO Plenary

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- ▶ Exchange of views with the International Partnership against Corruption in Sport (IPACS), represented by Pâquerette GIRARD ZAPPELLI, IPACS Vice-President (International Olympic Committee - IOC), Giuseppe DELEONARDIS, Head of Compliance, Risk and Internal Controls (IOC), and Konstantina OROLOGOPOULOU, IPACS and Governance Coordinator (IOC) (91<sup>st</sup> GRECO Plenary Meeting, 14 June)
- ▶ Exchange of views on corruption perception measuring Indices, bringing together: the World Justice Project - Rule of Law Index - represented by Elizabeth ANDERSEN, Executive Director, and Transparency International - Corruption Perceptions Index - represented by Roberto Martinez B KUKUTSCHKA, Research Expert - Corruption Measurement (92<sup>nd</sup> GRECO Plenary Meeting, 29 November)

### European Union (EU)

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- ▶ Meeting with MEP Katalin CSEH, Member of the Committee on Budgetary Control (CONT), rapporteur of the report on the Protection of the EU's Financial Interests, and David KARDOS, legal adviser in the European Parliament (online, 20 January) - Secretariat
- ▶ Bilateral discussions at the request of the European Commission, DG Just (online, 4 February) - Secretariat
- ▶ Exchange of views with the LIBE Democracy, Rule of Law and Fundamental Rights Monitoring Group (DRFMG) of the European Parliament (online, 31 March) - Secretariat
- ▶ Meeting with the EU Council of Ministers Western Balkans Working Party (Strasbourg, 30 September) - Secretariat
- ▶ European Parliament Committee on Petitions (PETI) workshop on transparency and how citizens are/ can be engaged in the fight against corruption (online, 10 October) - Secretariat
- ▶ Technical Assistance and Information Exchange Instrument of the European Commission (TAIEX) workshop with the High Judicial and Prosecutorial Council of Bosnia and Herzegovina - *Enhancing the appointment procedure of judges and prosecutors with a special focus on the appointment criteria* (Sarajevo, 23-24 November) - President
- ▶ 15<sup>th</sup> EU experience sharing programme workshop *The future of the fight against corruption in the EU* (Brussels, 14 December) - Secretariat

### Organisation for Economic Co-operation and Development (OECD)

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- ▶ Working Group on Bribery in International Business Transactions (online, 11-14 October, Paris, 6-9 December) - Secretariat
- ▶ OECD | International Olympic Committee webinars on the effective delivery of infrastructure and services for Olympic Games, webinar 1 *A robust governance structure to deliver the Games while ensuring inclusiveness*, webinar 2 *Promoting sustainability and ensuring legacy through strategic programme management* (online, 25 and 27 October) - Secretariat

### Organization of American States (OAS)

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- ▶ Thirty-Seventh Meeting of the Mechanism for the Implementation of the Inter-American Convention against Corruption (MESICIC) Committee of Experts, panel discussion on international anticorruption mechanisms and whistle blower protection (online, 16 March) - Secretariat

### Organisation for Security and Co-operation in Europe/Office for Democratic Institutions and Human Rights (OSCE/ODIHR)

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- ▶ OSCE Parliamentary Assembly Conference *Combating corruption, Defending Democracy: The Role of National Parliaments* (Nicosia, 27-28 May) - Secretariat
- ▶ Meeting with First Deputy Director of ODIHR, Kateryna RYABIKO (Strasbourg, 8 November) - Secretariat



## United Nations

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- ▶ First resumed 13<sup>th</sup> Session of the Implementation Review Group of the United Nations Convention against Corruption (Vienna, 8-9 September) – Secretariat
- ▶ Intersessional meeting of the Conference of the States Parties to the United Nations Convention against Corruption on the achievements of the political declaration adopted by the special session of the General Assembly against corruption (online, 5-8 September) - Secretariat
- ▶ International Labour Organization Technical meeting on the protection of whistle blowers in the public service sector (Geneva, 26-27 September) - Secretariat

## Sport Organisations: International Partnership against Corruption in Sport (IPACS) | FIFA

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- ▶ IPACS Bureau meetings (online, 31 January, 9 May, 6 July, 26 September) - Secretariat
- ▶ Working visit to FIFA Headquarters on cooperation with GRECO (Zurich, 10 March) - President, Secretariat
- ▶ Meeting of IPACS Task Force 2 – ensuring integrity in the selection of major sporting events (online, 9 June) - Secretariat
- ▶ IPACS Steering Committee at IOC headquarters (Lausanne, 8 November) - Secretariat

## Other contacts

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- ▶ Panel organised by the Bretton Woods Committee *Corruption: Global solutions for a global problem* (online, 25 January) - Secretariat
- ▶ DCAF Geneva Centre for Security Sector Governance training workshop on the protection of whistle blowers to support the Internal Control Department of the Ministry of the Interior of North Macedonia (online, 22 February) - Secretariat
- ▶ Federation for EDucation in Europe (FEDE) General Assembly ([video statement](#), 23 March) – President
- ▶ Business & Legal Forum annual Global Anticorruption & Compliance Summit (Paris, 8 April) - Vincent FILHOL, Head of delegation (France)
- ▶ Cooperation and synergy meetings with GRECO Secretariat counterparts in the UNODC, the OECD Working Group, and the OAS (online, 12 April and 3 October) - Secretariat
- ▶ Transparency International Estonia, Anti-Corruption Select Committee of the Parliament of Estonia | United States Embassy in Tallinn event *Transparency in policy making – way forward*, round table on lobbying (online, 13 April) - Secretariat
- ▶ Ministry of Justice and Public Administration of Croatia | Global Initiative Against Transnational Organized Crime regional high-level conference *Culture of Integrity: Enhancing Anti-Corruption Measures* (Šibenik, 22-24 May) - Vita HABJAN BARBORIČ, GRECO Bureau member (Slovenia)
- ▶ Meeting with a delegation from Kazakhstan: Ms Aigul BAZARBAYEVA, Head of the Department of Law and International Cooperation, Anti-Corruption Agency and Ms Aliya YEKHLASSOVA, Director of the Department of International Law and Cooperation, Ministry of Justice (Strasbourg, 25 May) - Secretariat
- ▶ Meeting with representatives of the Union of Turkish Bar Associations (UTBA) and various bar associations from Türkiye (Strasbourg, 2 June) - Secretariat
- ▶ Preparatory meeting for a High-level roundtable on Anti-corruption to be organised by the governments of Canada, Ecuador and the Netherlands as follow-up to the Summit for Democracy 2021 and to prepare for the 2<sup>nd</sup> Summit for Democracy in 2023 (Vienna, 20 June) - Secretariat
- ▶ Seminar *Integrity in the federal public administration - draft Royal Decree on Integrity in the Public Administration* hosted by the Deputy Prime Minister and Minister of Public Administration, Petra DE SUTTER (Brussels, 21 June) - Secretariat
- ▶ Meetings with the Deputy Prime Minister, Minister of Justice and Chair of the Corruption Prevention Commission of Armenia (Yerevan, 4 July) - Secretariat
- ▶ Meeting with the Spanish Public Affairs Association (Asociación de Profesionales de las Relaciones Institucionales) (Strasbourg, 16 September) - Secretariat
- ▶ Lecture given at the National Public Service Institute of France (Institut national du Service Public – INSP) on ethics in international organisations (Strasbourg, 27 September) - Secretariat

- ▶ Meeting with Ingrid SCHULERUD, Special representative, Democracy and Rule of law, Department for European Affairs and International Trade, Norwegian Ministry of Foreign Affairs on findings from monitoring and advisory bodies related to the main challenges for EEA and Norway Grants beneficiary countries (Strasbourg, 3 October) - Secretariat.
- ▶ Meeting with Andrii KOSTIN, Prosecutor General of Ukraine on strengthening safeguards for the independence and integrity of prosecutors, taking into account GRECO recommendations (Strasbourg, 14 October) - Secretariat
- ▶ Financial Action Task Force (FATF) plenary meeting (Paris, 18 October) - Secretariat
- ▶ European Network for Public Ethics conference *Revolving doors and cooling-off periods* with the President of the Commission for Conflict of Interest of Croatia (Zagreb, 9 November) - Vice-President
- ▶ European Partners Against Corruption | European Contact Point Network against Corruption (EPAC/EACN) Annual Conference (Chisinau, 23-24 November) - Secretariat
- ▶ [Statement](#) by GRECO's President on transparency and appropriate consultation in legislative processes issued on the occasion of International Anti-corruption Day (9 December) - President
- ▶ IACC 2022 - International Anti-Corruption Conference in Washington DC – *Uprooting Corruption, Defending Democratic Values* - global forum bringing together senior government representatives, civil society and the private sector to tackle corruption, organised every two years by Transparency International and a national government (online, 6-10 December) - Secretariat

## Council of Europe

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- ▶ European Union | Council of Europe Partnership for Good Governance II, high-level conference on *Integrity and Corruption Prevention in Armenia* (online, 23 February) – Secretariat
- ▶ European Union | Council of Europe Horizontal Facility for the Western Balkans and Türkiye high-level round table *New mechanism in the fight against corruption – the electronic system of declaration of assets and conflict of interests in Albania* (online, 28 February) - Secretariat
- ▶ Council of Europe Presidency of Italy | Venice Commission international round table *Shaping judicial councils to meet contemporary challenges* (online, 21-22 March) - Alastair BROWN, GRECO Evaluator (United Kingdom)
- ▶ Launch of the e-course *Introduction to Corruption Prevention* developed by the Economic Crime and Cooperation Division and hosted on the Human Rights Education for Legal Professional (HELP) platform (online, 27 April) - Secretariat
- ▶ Parliamentary Assembly of the Council of Europe (PACE), Committee on Rules of Procedure, Immunities and Institutional Affairs hearing on the report *Respect for the rule of law and fight against corruption within the Council of Europe* (Strasbourg, 29 April) - President
- ▶ European Union | Council of Europe Project against Economic Crime in Kosovo<sup>11</sup> Third Project Steering Committee and meeting with the Deputy Minister of Justice, the Director of the Anti-corruption Agency, the Deputy Director of the Financial Intelligence Unit (FIU) and other representatives of Kosovo\* (Strasbourg, 17 May) - Secretariat
- ▶ Exchange of views and presentation of GRECO's General Activity Report 2021 to the Committee of Ministers (1435<sup>th</sup> meeting of the Ministers' Deputies, 1 June) - President
- ▶ Press launch of GRECO's General Activity Report 2021 (Brussels, 2 June) - Secretariat
- ▶ European Union | Council of Europe Partnership for Good Governance II High-level conference *The Judiciary as Guardian of Democracy: Vice or Virtue?* hosted by the Constitutional Court of Armenia (online, 8-9 June) - Secretariat
- ▶ Meeting with the President of the Venice Commission, Claire BAZY-MALAUURIE (Strasbourg, 13 June) - President and Secretariat
- ▶ European Union | Council of Europe Partnership for Good Governance II High-level Conference on the Model Code of Conduct for Public Servants in Armenia (Yerevan, 4 July) - Secretariat

11. \*All reference to Kosovo, whether to the territory, institutions or population, in this text shall be understood in full compliance with United Nations Security Council Resolution 1244 and without prejudice to the status of Kosovo.

- ▶ Council of Europe Network of Corruption Prevention Authorities webinar *Tackling Corruption in Sports in the 21st Century* (online, 15 September) - Secretariat
- ▶ European Committee on Legal Co-operation (CDCJ), meeting of the Committee of Experts on the Protection of Lawyers (CJ-AV) (Strasbourg, 10 November) - Secretariat
- ▶ Meeting with representatives of the French anti-corruption network of researchers to be established under the umbrella of the Open Council of Europe Academic Networks (OCEAN) in partnership with the Law Faculty of the University of Strasbourg (Strasbourg, 26 November) - Secretariat
- ▶ Gender Equality Rapporteur training (Strasbourg, 29-30 November) - Vita HABJAN BARBORIČ, GRECO's General Equality Rapporteur and Bureau member (Slovenia)

## **Appendix 6 – GRECO secretariat (2022)**

Directorate General Human Rights and Rule of Law  
Information Society – Action against Crime Directorate

Hanne JUNCHER, **Executive Secretary of GRECO, Head of the Action against Economic Crime Department**  
Björn JANSON, **Deputy Executive Secretary of GRECO**

### **Senior legal advisors**

David DOLIDZE  
Gerald DUNN  
Tanja GERWIEN  
Stéphane LEYENBERGER  
Sophie MEUDAL-LEENDERS  
Ylli PECO  
Liubov SAMOKHINA  
Laura SANZ-LEVIA  
Anne WEBER

Bianca VALENTE, Assistant Administrator

Heather ROSCOW SCHMITT, Personal assistant to the Executive Secretary and Head of Department

Interns: Vera DE BOER, Xcaret ESTARAGUES

### **Central office and assistance**

Penelope PREBENSEN, Head of Central Office  
Diana FRECHOSO  
Carla RIQUELME

## Appendix 7 - Membership (2022)

### 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), Czech Republic (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), Russian Federation (1 February 2007; will cease to be a member as from 1 July 2023), Italy (30 June 2007), Monaco (1 July 2007), Liechtenstein (1 January 2010), San Marino (13 August 2010), Belarus (1 July 2006 - effective participation as of 13 January 2011; suspended as from 17 March 2022), Kazakhstan (1 January 2020).

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The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.



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

COUNCIL OF EUROPE



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