

Strasbourg, 27 March 2026

Greco(2026)9

102<sup>nd</sup> GRECO Plenary Meeting  
Strasbourg, 23-27 March 2026

DECISIONS

At its 102nd Plenary Meeting (Strasbourg, 23-27 March 2026) which was chaired by David Meyer (President of GRECO, United Kingdom), the Group of States against Corruption (GRECO):

1. noted the President's welcome message to Heads of delegation and representatives, thanking them for their valuable contribution to GRECO's work, in particular for their active role at national level, and for the expertise they bring to the mutual evaluation process in the plenary for the examination of reports addressed to other member States; and underlining that this plenary marks an important milestone as it is the first to examine evaluation reports of the 6<sup>th</sup> Evaluation Round;
2. noted the President's reminder that delegations are appointed on a permanent basis (Rule 3). Delegation members are the primary interlocutors for all communications. Only designated representatives attend plenary meetings. It is very important that changes to a delegation are promptly communicated by the Head of delegation to the Secretariat in order to keep the List of Representatives and corresponding mailing lists up to date;
3. adopted the agenda of the meeting;

#### Information

4. took note of the items discussed and decisions taken by the Bureau at its 110<sup>th</sup> meeting (Greco(2026)5);
5. took note of information provided as follows:

David Meyer, President of GRECO

- the President had participated in the 24th Annual Professional Conference and General Assembly organised by the European Partners Against Corruption & European contact-point network against corruption (The Hague, 24-25 November 2025), including as a speaker in a session on *Strategic support in the field of corruption and integrity*;
- the President's [statement](#) on the occasion of International Anti-Corruption Day (9 December 2025) emphasising that democracy is at risk without a culture of integrity and strong anti-corruption action and recalling that GRECO's work, anchored in the [New Democratic Pact for Europe](#), supports member States in strengthening in strengthening legal and institutional frameworks, promoting ethical leadership, and reinforcing accountable institutions that uphold citizens' trust and contribute to democratic security;

António Delicado, Vice-President of GRECO

- the Vice-President spoke on GRECO's 6th Evaluation Round at the IV Regional Conference on the Prevention of Corruption and Transparency organised by the Regional Government of the Azores (5 December); and on GRECO's 4th Evaluation Round at the Conference on *Integrity and Transparency in Public Action: the Judicial System*, organised by the Court of Appeal of Porto, the National Anti-Corruption Mechanism (MENAC) and the Portuguese Bar Association (10 December);

Livia Stoica Becht, Executive Secretary of GRECO

- the Secretariat's contributions to, and participation in, several meetings, including: the 11<sup>th</sup> Session of the Conference of the State Parties to the United Nations Convention against Corruption and joint special event organised by secretariats of treaty based monitoring bodies on *Milestones and Future Directions of Global Review Mechanisms* (Doha, 15-19 December); discussions of the Council of Europe's Steering Committee on Democracy (CDDEM) on Draft

parameters to facilitate the application and implementation of the [Reykjavik Principles for Democracy](#) (Strasbourg, 26 November); exchanges of views organised by the European Parliament's Democracy, Rule of Law and Fundamental Rights Monitoring Group (DRFMG) of the Committee on Civil Liberties, Justice and Home Affairs (LIBE) (2 December and 29 January 2026); a *Shadows meeting on the Committee on Civil Liberties, Justice and Home Affairs (LIBE)'s Own-Initiative Report on the Commission's 2025 Rule of Law report* (Strasbourg, 24 November); a *MATRA Training on Democratic institutions* for participants from the Hague Academy for Local Governance (3 December), a study visit for French magistrates (5 December) and bilateral meetings with high-level officials from the Netherlands (March 2026);

- the publication, since the last plenary meeting, of 11 reports and of GRECO's [thematic paper on whistleblower protection in law enforcement](#);
- expressed its appreciation for the secondment by the United Kingdom of Rebecca Ottolenghi to the GRECO Secretariat until 31 January 2026 and welcomed Hugo Damaggio and Alberto Martínez García who recently joined the Secretariat;

### Evaluation procedures

#### *6<sup>th</sup> Round - Preventing corruption and promoting integrity at the sub-national level*

6. approved the composition of the teams responsible for the 6<sup>th</sup> Round evaluations of Denmark, Malta and Spain (GrecoEval6(2026)1));
7. noted that nine on-site visits had been scheduled in 2026 – namely to the United Kingdom (12–16 January), Poland (2–6 March), Latvia (13–17 April), the Netherlands (18–22 May), Finland (21–25 September), Iceland (28 September–2 October), Cyprus (12–16 October), North Macedonia (2–6 November), and Sweden (23–27 November);
8. recalled that member States are provided with a predetermined advance schedule for the 6<sup>th</sup> Round in order to facilitate the identification of the appropriate sub-national authorities to be evaluated, and underlined that it is essential for members to meet the deadline set for communicating to the Secretariat both the proposed sub-national authorities for evaluation and the comprehensive responses to the questionnaire from all relevant authorities;
9. adopted the 6<sup>th</sup> Round Evaluation Reports on:
  - Estonia (GrecoEval6Rep(2025)1)
  - the Slovak Republic (GrecoEval6Rep(2025)2)

and set the deadline of 30 September 2027 for the submission of situation reports on the measures taken to implement GRECO's recommendations;

10. invited the authorities of Estonia and the Slovak Republic to disseminate the good practices identified in their respective reports among sub-national authorities and, where relevant, to bring the recommendations contained therein to their attention, including, where appropriate, through their associations, in order to address similar gaps in regulations and practices;
11. noted with satisfaction that the authorities of Estonia authorise the publication of the report mentioned in decision 9 above;
12. invited the authorities of the Slovak Republic to authorise, as soon as possible, the publication of the report mentioned in decision 9 above;

### Compliance procedures

13. noted the President's call on all Heads of delegation to strictly respect the submission deadlines fixed by GRECO in each adopted report, which was essential to ensure the proper conduct of compliance procedures;
14. took note of the information provided concerning the [high-level mission](#) to Poland (Warsaw, 28 November 2025) carried out pursuant to Rule 32 revised, paragraph 2 (iii) and led by GRECO's President, and the sincere thanks of the delegation to the Polish authorities and the Head of Poland's delegation to GRECO for the organisation of the mission;

### *Joint 1st and 2nd Rounds*

15. adopted the 2<sup>nd</sup> Joint 1<sup>st</sup> and 2<sup>nd</sup> Rounds Compliance Report on:
  - Kazakhstan (Greco RC-I/II (2026)1)and within the meaning of Rule 31 revised bis, paragraph 10, concluded that the country is not in sufficient compliance with the 1<sup>st</sup> and 2<sup>nd</sup> rounds recommendations;
16. pursuant to Rule 32 revised, paragraph 2 (i) asked the Head of delegation to provide a report on progress in implementing the outstanding recommendations by 31 March 2027 at the latest;
17. in accordance with Rule 32 revised, paragraph 2 (ii) b), invited the President of the Statutory Committee to send a letter to the Consul General of the Republic of Kazakhstan - with a copy to the Head of delegation – on the need for determined action to be taken with a view to achieving tangible progress as soon as possible;
18. invited the authorities of Kazakhstan to authorise, as soon as possible, the publication of the report mentioned in decision 15 above;

### *Fourth Round – Corruption prevention in respect of members of parliament, judges and prosecutors*

19. adopted the Addenda to the 2<sup>nd</sup> Fourth Round Compliance Reports on:
  - Czechia (GrecoRC4(2026)2)
  - Hungary (GrecoRC4(2026)3)and pursuant to Rule 31 revised, paragraph 9 of the Rules of Procedure, asked the Heads of delegation to provide a report on progress in implementing certain recommendations by 31 March 2027 at the latest;
20. adopted the 2<sup>nd</sup> Addendum to the 2<sup>nd</sup> Fourth Round Compliance Report on:
  - Ukraine (GrecoRC4(2026)5)and closed the 4<sup>th</sup> Round compliance procedure in respect of this member;
21. adopted the 6<sup>th</sup> *interim* Fourth Round Compliance Report on:
  - Türkiye (GrecoRC4(2026)4)

concluded that the level of compliance with the recommendations is no longer “globally unsatisfactory” in the meaning of Rule 31, paragraph 8.3 of the Rules of Procedure and decided to cease the application of Rule 32 of the Rules of Procedure in respect of this member;

22. pursuant to Rule 31 revised, paragraph 8.3 of the Rules of Procedure, asked the Head of delegation of Türkiye to provide a report on progress in implementing the outstanding recommendations by 31 March 2027 at the latest;

23. adopted the 5<sup>th</sup> *interim* Fourth Round Compliance Report on:

- Denmark (GrecoRC4(2026)1)

and closed the 4<sup>th</sup> Round compliance procedure in respect of this member;

24. having had recourse to the measures provided for in Rule 32, paragraph 2 (i), (ii) and (iii), notes with deep regret that Denmark still remains not in sufficient compliance with the recommendations issued under the 4<sup>th</sup> Evaluation Round, in particular those addressed to members of parliament, and expresses its dissatisfaction that, given the protracted state of non-compliance, it has been deemed necessary to close the compliance procedure without achieving an adequate level of implementation;

25. invited the authorities of Czechia, Denmark, Hungary, Ukraine and Türkiye to authorise, as soon as possible, the publication of the reports mentioned in decisions 19, 20, 21 and 23 above;

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

26. adopted, in the framework of Rule 31 revised bis, the Fifth Round Compliance Reports on:

- Republic of Moldova (GrecoRC5(2026)4)
- Türkiye (GrecoRC5(2026)2)

and noted that further progress was necessary to achieve an adequate level of compliance within the next 18 months, and set the deadline of 30 September 2027 for the submission by the respective Heads of delegation of a situation report on additional measures taken to implement the Fifth Round recommendations;

27. adopted the 2<sup>nd</sup> Fifth Round Compliance Report on:

- Greece (GrecoRC5(2026)1)

and within the meaning of Rule 31 revised bis, paragraph 10, concluded that the country is not in sufficient compliance with the 5<sup>th</sup> Round recommendations;

28. pursuant to Rule 32 revised, paragraph 2 (i), asked the Head of delegation to provide a report on progress in implementing the outstanding recommendations by 31 March 2027 at the latest;

29. in accordance with Rule 32 revised, paragraph 2, sub-paragraph (ii) b), invited the President of the Statutory Committee to send a letter to the Permanent Representative of Greece to the Council of Europe - with a copy to the Head of delegation – on the need for determined action to be taken with a view to achieving tangible progress as soon as possible;

30. adopted the 2<sup>nd</sup> Fifth Round Compliance Report on:

- Lithuania (GrecoRC5(2026)3)

and closed the 5<sup>th</sup> Round compliance procedure in respect of this member;

31. noted with satisfaction that the authorities of the Republic of Moldova authorise the publication of the report mentioned in decision 26 above;
32. invited the authorities of Greece, Lithuania and Türkiye to authorise, as soon as possible, the publication of the reports mentioned in decisions 26, 27, and 30 above;

#### General Activity Report 2025

33. adopted its General Activity Report 2025 (Greco(2026)4-fin);
34. instructed the Secretariat to forward the report to GRECO's Statutory Committee and to the Committee of Ministers of the Council of Europe, in accordance with Article 8, paragraph 1 of the Statute and noted that the report will be published immediately after it has been presented by GRECO's President to the 1562<sup>nd</sup> Meeting of the Ministers' Deputies (Strasbourg, 3 June 2026);<sup>1</sup>

#### Topical anti-corruption developments/events in member States (Item 4)

35. took note of information provided at the request of the Bureau by the Delegations of Bulgaria<sup>2</sup>, Georgia<sup>3</sup>, Romania<sup>4</sup>, and the United States<sup>5</sup>, as well as information shared by Albania, Azerbaijan, Cyprus, Malta, the Netherlands, Portugal and Slovenia;
36. invited Delegations that wished their presentations to be distributed to all GRECO members to send them to the Secretariat by the end of the week;

#### Thematic paper on Codes of Conduct

37. took note of and welcomed the thematic paper on Codes of Conduct prepared by the Secretariat;

#### Information from observer organisations and Council of Europe bodies

38. took note of the information provided by the representative of the European Union on topical developments in the anti-corruption area;

#### Transparency and Publication of Reports<sup>6</sup>

<sup>1</sup> GRECO was informed, after the adoption of the list of decisions, of the postponement of the exchange of views to a later date.

<sup>2</sup> On the vote by the Bulgarian Parliament to abolish the Anti-Corruption Commission, with its functions split and transferred to the General Directorate for Combating Organised Crime (GDCOC) of the Ministry of Interior and to the National Audit Office (NAO).

<sup>3</sup> On the new role of the central anti-corruption body in overseeing compliance with legislation on foreign influence and the resulting implications for its existing financial and human resources.

<sup>4</sup> On new developments regarding judicial and prosecutorial independence around allegations of political control and systemic interference in major corruption cases raised by 'whistleblower' judges and prosecutors in the Recorder investigative documentary, and the ensuing public demonstrations and institutional reactions.

<sup>5</sup> An update on developments in respect of the prosecution of corruption offences, and integrity frameworks within the federal government, since January 2025.

<sup>6</sup> *Action to be taken when publishing adopted reports* (decision 26, GRECO 58):

- agree a same-day publication date with the Secretariat
- clearly mark both the date of adoption and date of publication on the cover page
- make the national language version available and easily accessible on a domestic website
- notify the Secretariat of the location of the report by communicating the internet link to it
- include a link on the domestic website to the official language versions on GRECO's website.

39. examined and adopted the Bureau's proposal regarding increased transparency (GRECO(2026)6) setting out a standardised approach to the publication of summaries in application of Rule 35, paragraph 2, of the Rules of Procedure, as well as templates for public summaries of evaluation and compliance reports;
40. decided that a summary of an evaluation or compliance report shall be published on GRECO's website within six months of the report's adoption, unless the member State concerned authorises publication of the full report before that date; agreed that, for reports currently falling under this arrangement, publication of summaries shall take place on 1 June 2026;
41. called on the authorities of the member States concerned to authorise, without further delay and in line with GRECO's long-standing practice, the publication of previously adopted reports by GRECO;<sup>7</sup> noting in this context that the President urged the following delegations: Azerbaijan and Türkiye (reports from 2023); Czechia, Hungary and Türkiye (reports from 2024); Azerbaijan (report from 2025);
42. recalls that enhanced transparency contributes to public trust, accountability and the effectiveness of GRECO's monitoring process, and reaffirms that the publication of a summary does not substitute for the publication of the full report, which remains the objective pursued;

#### Future meetings

43. took note of the following dates:
  - 111<sup>th</sup> Bureau meeting: 27 April 2026
  - 103<sup>rd</sup> Plenary Meeting: Strasbourg, 8-12 June 2026 – in person only
  - 104<sup>th</sup> Plenary Meeting: Strasbourg, 16-20 November 2026– in person only.

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<sup>7</sup> Adopted in March 2023: Fifth Round Evaluation Report on Azerbaijan; adopted in December 2023: Fifth Round Evaluation Report on Türkiye; adopted in June 2024: Fifth Round Compliance Report on Hungary; adopted in November 2024: Fourth Round 2<sup>nd</sup> Compliance Report on Hungary, Fourth Round 5<sup>th</sup> *Interim* Compliance Report on Türkiye and Fourth Round 3<sup>rd</sup> *Interim* Compliance Report on Czechia; adopted in March 2025: Fifth Round Compliance Report on Azerbaijan; adopted in June 2025: Fifth Round Compliance Report on Czechia; adopted in November 2025: Fifth Round 2<sup>nd</sup> Addendum to the Second Compliance Report on Slovenia.