

Adoption: 6 June 2025  
Publication: 16 September 2025

Public  
GrecoRC5(2025)13

# FIFTH EVALUATION ROUND

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

## COMPLIANCE REPORT

# CYPRUS



Adopted by GRECO  
at its 100<sup>th</sup> Plenary meeting (Strasbourg, 3-6 June 2025)



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



## **I. INTRODUCTION**

1. The Fifth GRECO evaluation round concerns “Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies”.
2. This Compliance Report assesses the measures taken by the authorities of Cyprus to implement the recommendations made in the [Fifth Round Evaluation Report](#) on Cyprus which was adopted by GRECO at its 94<sup>th</sup> plenary meeting (5-9 June 2023) and made public on 2 October 2023.
3. As required by GRECO’s Rules of Procedure,<sup>1</sup> the authorities of Cyprus submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 23 December 2024. Additional information was submitted on 31 March 2025. These contributions served as a basis for this Compliance Report.
4. GRECO selected Ireland (in respect of top executive functions in central governments) and Liechtenstein (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Emma Caprani, on behalf of Ireland, and Fabian Ritter, on behalf of Liechtenstein. They were assisted by GRECO’s Secretariat in drawing up this report.
5. The Compliance Report assesses the implementation of each individual recommendation contained in the Evaluation Report and gives an overall appraisal of the level of the member’s compliance with these recommendations. The implementation of any outstanding recommendations (partly or not implemented) will be assessed on the basis of a further Situation Report to be submitted by the authorities 18 months after this Compliance Report is adopted.

## **II. ANALYSIS**

6. GRECO addressed 22 recommendations to Cyprus in its Evaluation Report. Compliance with these recommendations is dealt with below.

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

### **Recommendation i**

7. *GRECO recommended that (i) the integrity requirements of persons hired at the discretion of central government to give advice to persons entrusted with top executive functions or to perform similar functions be thoroughly regulated, including as regards rules of conduct, conflicts of interest and financial disclosure obligations; and (ii) that the names, functions and contractual benefits (salaries etc.) of those hired for these positions*

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<sup>1</sup> The compliance procedure for the Fifth Evaluation Round is governed by GRECO’s Rules of Procedure as amended. See Rule 31 revised bis and Rule 32 revised bis.

*are made easily accessible online and, when part-time recruitment/ad hoc engagement is the case, that information on their main job/activities is included.*

8. As regards the first part of the recommendation, the authorities of Cyprus report the following measures. In the first place, Law no. 20(I)/2024 “On Consultants-Associates of Members of the Government”<sup>2</sup> was adopted on 29 February 2024. This Law regulates the employment and legal status of this category of persons with top executive functions (PTEFs). In particular, Article 8 § 3 establishes the binding nature of the specific code of conduct, the violation of which is considered a breach of the employment contract and may lead to its termination. Article 11<sup>3</sup> requires consultants-associates to avoid conflicts of interest and to declare any such conflict. Secondly, by a decision of 13 March 2024, the Council of Ministers approved a model contract of employment for consultants-associates. By signing this contract, a consultant-associate undertakes to comply with the dedicated Code of Conduct and the member of the Government concerned has the right to terminate the consultant's employment in the event of a conflict of interest or a breach of the Code of Conduct (see Articles 2.3.5, 6.5 and 6.6 of the contract template). Thirdly, the Code of Conduct for Consultants-Associates of Members of the Government<sup>4</sup> was adopted in May 2024. It contains provisions on, *inter alia*, the duty of confidentiality, conflicts of interest, gifts and the acceptance of hospitality. Finally, Law no. 137(I)/2024 “On Certain Officials and Certain Publicly Exposed Persons of the Republic of Cyprus (Submission and Control of Declaration of Assets and Personal and

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<sup>2</sup> [Ο περί Συμβούλων-Συνεργατών των Μελών της Κυβέρνησης Νόμος του 2024 - 20\(I\)/2024](#)

<sup>3</sup> Article 11 “**Conflict of interest of a consultant-partner**”: (1) The consultant-associate shall avoid conflict of interest in the performance of his/her duties under the employment contract. It is understood that there is no conflict of interest where the consultant-associate derives a benefit only as a member of the general public or a broader category of persons.

(2) The consultant- associate shall refrain from interference which may be construed as favouritism or preferential treatment towards any person.

(3) The consultant-associate declares a conflict of interest which may relate to a matter discussed in the course of performing his or her duties with the member of the government with whom he or she has signed an employment contract or in another discussion in which he or she participates in which a decision is being made and abstains from participating.

(4) The consultant- associate shall: (a) declare in writing to the member of the government with whom he or she intends to enter into an employment contract before taking office any existing conflict of interest that is settled before taking office, and inform in writing the member of the government of the manner of such settlement;(b) report in writing to the member of the government with whom he or she has entered into an employment contract any conflict of interest as soon as he or she becomes aware of it; and (c) declare in writing to the member of the government with whom he or she has an employment contract whether or not he or she has a conflict of interest, whenever requested to do so.

(5) The consultant-associate shall, before signing the employment contract, inform in writing the member of the Government with whom he intends to enter into the employment contract of any participation of him and his spouse or partner or children in the capital or management of an enterprise which is directly or indirectly engaged in the fields related to the scope and duties of the position in the employment contract, the manner of participation and whether they exercise effective control over it or hold executive or senior managerial position. It is understood that the consultant-associate shall report, in writing, immediately to the member of the Government with whom he has concluded an employment contract any subsequent changes in the information in question.

<sup>4</sup>[https://www.presidentcy.gov.cy/cypresidency/cypresidency.nsf/All/576E51B79A078057C2258B2C003E7F18/\\$file/%CE%9A%CE%A9%CE%94%CE%99%CE%9A%CE%91%CE%A3%20%CE%94%CE%95%CE%9F%CE%9D%CE%A4%CE%9F%CE%9B%CE%9F%CE%93%CE%99%CE%91%CE%A3%20%CE%A3%CE%A5%CE%9C%CE%92%CE%9F%CE%A5%CE%9B%CE%A9%CE%9D%20%CE%A3%CE%A5%CE%9D%CE%95%CE%A1%CE%93%CE%91%CE%A4%CE%A9%CE%9D.pdf?OpenElement](https://www.presidentcy.gov.cy/cypresidency/cypresidency.nsf/All/576E51B79A078057C2258B2C003E7F18/$file/%CE%9A%CE%A9%CE%94%CE%99%CE%9A%CE%91%CE%A3%20%CE%94%CE%95%CE%9F%CE%9D%CE%A4%CE%9F%CE%9B%CE%9F%CE%93%CE%99%CE%91%CE%A3%20%CE%A3%CE%A5%CE%9C%CE%92%CE%9F%CE%A5%CE%9B%CE%A9%CE%9D%20%CE%A3%CE%A5%CE%9D%CE%95%CE%A1%CE%93%CE%91%CE%A4%CE%A9%CE%9D.pdf?OpenElement)

Professional Property Statements)”<sup>5</sup> was adopted on 11 July 2024. This law regulates financial disclosure obligations of different categories of public officials and is applicable to consultants-associates hired at the discretion of the Government to give advice (hereinafter – consultants-associates) (Annex I, paragraph 44).

9. As regards the second part of the recommendation, the authorities indicate that the register of employed consultants-associates is published on the website of the Presidency<sup>6</sup>. In accordance with Article 16 paragraph 4 of Law 20(I)/2024, the register includes the name of the consultant-associate, the member of the Government with whom he/she has been contracted, his/her remuneration and academic or professional title, as well as the duration of the employment (start and end dates). This information remains on the website of the Presidency for the entire duration of the relevant employment contract and for a period of up to two years after its expiry or termination. The information on the specific functions of each consultant-associate is also made public<sup>7</sup>. As regards secondary activities, Article 8(5) of the above Law stipulates that the consultant-associate is not permitted to undertake any other employment besides that defined in their employment contract.
10. GRECO takes note of this information and acknowledges that Cyprus has come a long way in meeting this recommendation. Regarding the first part of the recommendation, GRECO welcomes the adoption of the regulatory framework governing the legal status and employment of consultants-associates of members of the government, as well as the Code of Conduct of a binding nature applicable to this category of PTEFs. It is also a very positive step that the requirement to disclose conflicts of interest for this category is thoroughly spelled out and covers pre-appointment disclosure, ad-hoc disclosure and disclosure at the request of the member of the government. GRECO is also pleased that financial disclosure obligations are extended to those consultants-associates who are hired at the discretion of the Government to give advice and are considered as “publicly exposed persons” within the meaning of Law no. 137(I)/2024 (see also paragraph 61 below). This part of the recommendation has therefore been implemented satisfactorily.
11. As regards the second part of the recommendation, GRECO appreciates that the register of consultants-associates, as well as the list their functions, are now published on the

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<sup>5</sup>Ο περί Ορισμένων Αξιωματούχων και Ορισμένων Δημόσια Εκτεθειμένων Προσώπων της Κυπριακής Δημοκρατίας (Υποβολή και Έλεγχος Δήλωσης Περιουσιακών Στοιχείων και Καταστάσεων Προσωπικής και Επαγγελματικής Περιουσίας) Νόμος του 2024 - 137(I)/2024

<sup>6</sup>[https://www.presidency.gov.cy/cypresidency/cypresidency.nsf/All/92EE0D2BDECA36A6C2258B2C003CCBD4/\\$file/%CE%9C%CE%97%CE%A4%CE%A1%CE%A9%CE%9F%20%CE%A3%CE%A5%CE%9C%CE%92%CE%91%CE%A3%CE%95%CE%A9%CE%9D%20%CE%A3%CE%A5%CE%9C%CE%92%CE%9F%CE%A5%CE%9B%CE%A9%CE%9D%20%CE%A3%CE%A5%CE%9D%CE%95%CE%A1%CE%93%CE%91%CE%A4%CE%A9%CE%9D\\_20250224.pdf?OpenElement](https://www.presidency.gov.cy/cypresidency/cypresidency.nsf/All/92EE0D2BDECA36A6C2258B2C003CCBD4/$file/%CE%9C%CE%97%CE%A4%CE%A1%CE%A9%CE%9F%20%CE%A3%CE%A5%CE%9C%CE%92%CE%91%CE%A3%CE%95%CE%A9%CE%9D%20%CE%A3%CE%A5%CE%9C%CE%92%CE%9F%CE%A5%CE%9B%CE%A9%CE%9D%20%CE%A3%CE%A5%CE%9D%CE%95%CE%A1%CE%93%CE%91%CE%A4%CE%A9%CE%9D_20250224.pdf?OpenElement)

<sup>7</sup>[https://www.presidency.gov.cy/cypresidency/cypresidency.nsf/All/1931807869A03D85C2258C8B00222580/\\$file/%CE%9A%CE%91%CE%98%CE%97%CE%9A%CE%9F%CE%9D%CE%A4%CE%91%20%CE%A3%CE%A5%CE%9C%CE%92%CE%9F%CE%A5%CE%9B%CE%A9%CE%9D%20%CE%A3%CE%A5%CE%9D%CE%95%CE%A1%CE%93%CE%91%CE%A4%CE%A9%CE%9D%20%CE%9C%CE%95%20%CE%9C%CE%95%CE%9B%CE%97%20%CE%A4%CE%97%CE%A3%20%CE%9A%CE%A5%CE%92%CE%95%CE%A1%CE%9D%CE%97%CE%A3%CE%97%CE%A3\\_20250515.pdf?OpenElement](https://www.presidency.gov.cy/cypresidency/cypresidency.nsf/All/1931807869A03D85C2258C8B00222580/$file/%CE%9A%CE%91%CE%98%CE%97%CE%9A%CE%9F%CE%9D%CE%A4%CE%91%20%CE%A3%CE%A5%CE%9C%CE%92%CE%9F%CE%A5%CE%9B%CE%A9%CE%9D%20%CE%A3%CE%A5%CE%9D%CE%95%CE%A1%CE%93%CE%91%CE%A4%CE%A9%CE%9D%20%CE%9C%CE%95%20%CE%9C%CE%95%CE%9B%CE%97%20%CE%A4%CE%97%CE%A3%20%CE%9A%CE%A5%CE%92%CE%95%CE%A1%CE%9D%CE%97%CE%A3%CE%97%CE%A3_20250515.pdf?OpenElement)

website of the Presidency. This part of the recommendation should also be considered fully implemented.

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

#### **Recommendation ii**

13. *GRECO recommended that persons entrusted with top executive functions undergo an integrity check ahead of or right upon their appointment in order to identify and manage possible conflicts of interest.*
14. Regarding members of the Government, the authorities of Cyprus refer to Articles 7 and 16 of the new dedicated Code of Conduct<sup>8</sup>, which was adopted in October 2023. Article 7 requires a member of the Government to resolve an existing conflict of interest before taking up his duties, to avoid such a conflict or to deal promptly with any emerging one, and to declare conflicts of interest. In addition, this provision requires a member of the Government to inform the President of the Republic, either before or within reasonable time after taking office, of all professional activities exercised during the three years preceding his or her appointment, of the professional activities of his or her spouse, partner and children, and of any outstanding tax and other related obligations to the State. Secondary activities are not allowed (Article 3 (γ) of the Code of Conduct). Article 16 of the Code of Conduct sets out the duties of the Ethics Adviser, which include providing general guidance and confidential advice, monitoring the implementation of the Code and investigating any alleged breach of the Code. This provision requires that all necessary information be provided to the Ethics Adviser to enable them to carry out their functions effectively. The authorities refer to the statutory requirement to submit a declaration of assets and related documents within four months of assuming office, as well as to the verification mechanism established by Laws Nos. 112(I)/2024 and 137(I)/2024 (for more details, see Recommendations X and XI below). The authorities argue that the combination of these measures constitutes an adequate integrity check.
15. With regard to consultants-associates, the authorities raise the same argument. In particular, they refer to Articles 6 and 7 of the new Law “On Consultants-Associates of Members of the Government”. Article 6 sets out the eligibility requirements, which include, *inter alia*, a clean criminal record, no record of dismissal or termination of public service for disciplinary misconduct or commission of a crime, and no blood or marriage ties to members of the Government. Articles 7 and 16 require a member of the Government to verify that the selected consultant meets the eligibility requirements before signing the contract and to collect and process all necessary personal information and data. The Presidency Administration is responsible for overseeing employment

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<sup>8</sup>[https://www.presidency.gov.cy/cypresidency/cypresidency.nsf/All/441037CAC5CF4165C2258B2C003E8AF5/\\$file/%CE%9A%CE%A9%CE%94%CE%99%CE%9A%CE%91%CE%A3%20%CE%94%CE%95%CE%9F%CE%9D%CE%A4%CE%9F%CE%9B%CE%9F%CE%93%CE%99%CE%91%CE%A3%20%CE%9C%CE%95%CE%9B%CE%A9%CE%9D%20%CE%A4%CE%97%CE%A3%20%CE%9A%CE%A5%CE%92%CE%95%CE%A1%CE%9D%CE%97%CE%A3%CE%97%CE%A3%20-%CE%91%CE%9E%CE%99%CE%A9%CE%9C%CE%91%CE%A4%CE%9F%CE%A5%CE%A7%CE%A9%CE%9D.pdf?OpenElement](https://www.presidency.gov.cy/cypresidency/cypresidency.nsf/All/441037CAC5CF4165C2258B2C003E8AF5/$file/%CE%9A%CE%A9%CE%94%CE%99%CE%9A%CE%91%CE%A3%20%CE%94%CE%95%CE%9F%CE%9D%CE%A4%CE%9F%CE%9B%CE%9F%CE%93%CE%99%CE%91%CE%A3%20%CE%9C%CE%95%CE%9B%CE%A9%CE%9D%20%CE%A4%CE%97%CE%A3%20%CE%9A%CE%A5%CE%92%CE%95%CE%A1%CE%9D%CE%97%CE%A3%CE%97%CE%A3%20-%CE%91%CE%9E%CE%99%CE%A9%CE%9C%CE%91%CE%A4%CE%9F%CE%A5%CE%A7%CE%A9%CE%9D.pdf?OpenElement)

contracts and maintaining a register of them. These arrangements ensure that the relevant information is checked. The authorities further recall that secondary activities are prohibited (Article 8 (5)). The authorities also refer to the applicable provisions governing the conflicts of interest<sup>9</sup> and to Article 11 of the Code of Conduct for Consultants-Associates, which sets out the functions of the Internal Audit Unit of the Presidency of the Republic. These functions include providing general guidance and confidential advice, monitoring the implementation of the Code and investigating any alleged breach of the Code. Consultants-associates are required to provide the Audit Unit with all the necessary information to enable it to carry out its monitoring and investigative functions. The authorities also refer to the investigative powers of the Anti-Corruption Authority and indicate that consultants-associates submit declarations of assets within four months of assuming office, and these declarations are verified in accordance with the provisions of Law no. 137(I)/2024 (see Recommendations X and XI below). The limited duration of their employment contract (five years) provides an additional safeguard.

16. GRECO takes note of these submissions and observes that the combination of various area-specific mechanisms (verification of eligibility requirements and financial declarations, the declaration and management of the conflicts of interest and the monitoring of the implementation of the rules of conduct etc) covers all the relevant areas and constitutes a sufficient integrity check. Moreover, integrity checks extend to all categories of PTEFs. As the current arrangements would benefit from a systemic approach and inter-institutional synergies, GRECO encourages the authorities to consider how they can be developed and consolidated further.
17. GRECO concludes that recommendation ii has been implemented satisfactorily.

### **Recommendation iii**

18. *GRECO recommended developing a coordinated strategy for the integrity of persons entrusted with top executive functions, based on systematic and comprehensive risk assessment, aiming at preventing and managing conflicts of interest, including through responsive and efficient advisory, monitoring and compliance measures.*
19. The authorities of Cyprus refer to the newly adopted Codes of Conduct for Members of the Government and consultants-associates and the recent appointment of the Ethics Advisor. Moreover, on 8 May 2025, the Independent Anti-Corruption Authority amended its Action Plan for 2025-2026 to include action aimed at safeguarding the integrity of PTEFs (including consultants-associates)<sup>10</sup>. The Action Plan enumerates the following key risk areas: bribery, extortion, over expenditure, nepotism, abuse of position for personal gain, conflict of interests, abuse of power, lack of transparency, revolving doors phenomenon and violation of ethical standards. The Action Plan envisages the following measures: a study by independent experts to identify risk areas,

<sup>9</sup> See paragraph 8 above, footnote 3. Article 11 of Law no. 20(I)/2024 and Article 6 the Code of Conduct for Consultants-Associates have almost identical wording.

<sup>10</sup><https://www.iaac.org.cy/iaac/iaac.nsf/All/967A0F6A9BBC4225C2258C6700233D52?OpenDocument>

requisite action and monitoring methodology; discussion of the findings of the study by the authorities concerned; training of PTEFs on the basis of the findings of the study and other measures. The Action Plan also requires each department or organisation within the public and wider public sectors to develop a sector-specific anti-corruption plan. It also envisages the revision of the Code of Conduct for Civil Servants (employees and officials of the public and wider public sector).

20. GRECO emphasises that the key elements of this recommendation are the comprehensive assessment of the specific corruption risks to which PTEFs are exposed (e.g. risks of nepotism, favouritism or those arising from the interface between business and political actors; risks related to lobbying, asset ownership or post-governmental employment), and the development, on the basis of the assessment, of a dedicated strategy document, with a long-term vision, setting out concrete steps to mitigate the identified risks. GRECO notes that the amended Action Plan of the Anti-Corruption Authority outlines some risk areas and includes specific measures in this respect, starting with a study by independent experts. This is a positive development and GRECO looks forward to receiving the strategy document to be developed in due course. As for the Codes of Conduct and the counselling mechanism, GRECO will consider them under recommendations iv and v below.
21. GRECO concludes that recommendation iii has been partly implemented.

#### **Recommendation iv**

22. *GRECO recommended (i) that a code of conduct for persons entrusted with top executive functions be adopted, published and complemented with dedicated guidance regarding conflicts of interest and other integrity related matters (on issues such as the prevention of conflicts of interest, gifts, hospitality and other advantages, third party contacts, accessory activities and post-employment situations, disclosure requirements, the handling of confidential information), and (ii) that it be coupled with a credible and effective mechanism of supervision and sanctions.*
23. The authorities of Cyprus report that the new Code of Conduct for Members of the Government has already been signed by each Government Member. The Secretary of the Council of Ministers specifically informed all the addressees of the Code about the actions to be taken when accepting gifts. The new Code of Conduct for Consultants-Associates has become part of their employment contract. Both Codes are published on the website of the Presidency (see footnotes 4 and 8 above). The Ethics Adviser and Internal Audit Unit of the Presidency may periodically issue guidelines for the interpretation and application of the relevant Codes of Conduct. Regarding the sanctions mechanism, the authorities explain that the scale of sanctions is not specified in order to avoid restricting the President's or a Government member's discretion to dismiss PTEFs in the event of misconduct. The authorities also indicate that the lobbying and financial disclosure laws provide distinct mechanisms of sanctions.
24. GRECO welcomes the adoption and publication of the two Codes of Conduct, which now cover all the PTEFs identified in the Evaluation Report, except for the President of the Republic. The new Code of Conduct for Members of the Government contains the



provisions on the good management of public resources, conflicts of interest<sup>11</sup>, the treatment of confidential information and the acceptance of gifts and hospitality. Regarding the incompatibilities and post-employment, the Code specifically refers to the relevant legislation (see paragraphs 110 and 122 of the Evaluation Report). Moreover, the Code provides a list of relevant laws and regulations in an annex. The new Code of Conduct for Consultants-Associates also contains the provisions on conflicts of interest, gifts and hospitality, as well as the handling of confidential information. The provision on conflicts of interest follows the wording of the relevant statutory provision (see footnote 3 above). In GRECO's view, the provisions on conflicts of interest in both Codes address its concerns expressed in the Evaluation Report (see paragraph 116).

25. It is very positive that both Codes contain a general prohibition on the acceptance of gifts, with the exception of purely complimentary and/or minor items of a commemorative nature, which are offered either within or outside the Republic, in the context of the customary practice and/or official visits or missions, the value of which does not exceed 150 EUR. A member of Government may, however, accept a gift with a value exceeding this threshold in exceptional circumstances. Unlike the Code of Conduct for Consultants-Associates, the Code of Conduct for Members of the Government also provides for a requirement to report and register such a gift, as well as a possibility to consult the General Accounting Office in case of doubt about the value of a gift. In this context, GRECO recalls that it has emphasised the importance of robust provisions on gifts (paragraph 116 of the Evaluation Report), which should normally cover the necessary transparency safeguards, such as reporting and registration. These safeguards are important for *all* gifts. As GRECO has previously pointed out, even a gift below the established threshold may compromise the impartiality and integrity of the recipient. The Code of Conduct for Consultants-Associates would therefore benefit from being aligned or harmonised with that for Members of the Government.
26. GRECO regrets that neither Code is accompanied by practical guidance, which is particularly important given that several key integrity issues are addressed in separate documents: for example, a law and a separate guide are dedicated to the issue of lobbying; financial disclosure obligations are regulated by Law no. 137(I)/2024. Post-employment is regulated by Law no. 114(I)/2007, which, however, does not extend to all political appointees (see paragraph 124 and footnote 57 of the Evaluation Report). In this context, GRECO reiterates its long-standing position regarding the importance of consolidating all integrity rules in a single document. GRECO therefore invites the authorities to develop the requisite practical guidance for both Codes with real-life examples and explanatory material, providing references to all the relevant legislation and guidelines. When information is scattered, the likelihood of it being ignored is high, creating a possible knowledge gap. The periodic issuance of guidelines by monitoring bodies cannot replace a comprehensive, practice-oriented guide or manual to accompany the codes of conduct.
27. In summary, while the authorities must be given credit for the important work they have done on the above Codes of Conduct, further efforts are needed, and GRECO looks

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<sup>11</sup> See paragraph 14 above.



forward to receiving an update in this respect in due course. The first part of this recommendation should be considered partly implemented.

28. As regards the second part of the recommendation, GRECO notes that there are separate mechanisms of supervision for members of the Government and Consultants-Associates.
29. In accordance with Article 16 of the Code of Conduct for Members of the Government, an Ethics Adviser carries out monitoring duties and investigates an alleged breach of the Code by a member of the Government. Such an investigation is carried out either on the instructions of the President or on the Ethics Adviser's own initiative with the President's approval. On the basis of this investigation, the President shall decide on the existence of a violation of the Code and on the appropriate measures which, depending on the seriousness of the violation, may take the form of correction and/or assumption of political responsibility or termination of the duties of the member concerned. Any decision by the President of the Republic shall not exempt the member of the Government from the provisions of other laws of the Republic.
30. In accordance with Article 11 of the Code of Conduct for Consultants-Associates, the Internal Audit Unit of the Presidency of the Republic performs monitoring tasks in cooperation with and on the basis of the instructions of the member of the Government concerned. This Unit investigates an alleged breach of the Code by a consultant and informs the member of the Government of its findings. The member of the Government shall decide on any necessary and/or appropriate measures which may take the form of corrective action and/or termination and/or cancellation of the employment contract. In the event of a serious violation involving criminal liability, the member of the Government may apply to the Attorney General of the Republic.
31. GRECO welcomes that the supervision body and mechanism are specified in each Code of Conduct. At the same time, there is a lack of clarity with regard to sanctions. While the termination of duties or employment appears to be the most severe one, the Codes do not specify what a corrective measure may amount to. It would be useful to indicate, either in the Codes or in related practical guidance, what kind of misconduct amounts to a serious breach, as well as the consequences for less serious breaches. GRECO notes the authorities' argument regarding the President's or a Government member's discretion in such matters, however, clarity and transparency are key for effective implementation of the rules of conduct. GRECO considers the second part of the recommendation partly implemented. The sanctions mechanism concerning financial disclosure will be analysed under recommendation xi below.
32. GRECO therefore concludes that recommendation iv has been partly implemented.

#### **Recommendation v**

33. *GRECO recommended (i) developing mechanisms to promote and raise awareness on integrity matters among persons exercising top executive functions, including through integrity training at regular intervals; and (ii) establishing dedicated confidential*

*counselling to provide persons exercising top executive functions with advice on integrity, conflicts of interest and corruption prevention.*

34. As regards training and awareness raising, the authorities refer to the ongoing training programme of the Independent Anti-Corruption Authority. A total of 51 training and awareness sessions have been conducted since June 2023. Around 1,300 individuals have attended the above sessions. Approximately 60 PTEFs participated, including 20 ministers and deputy ministers, and 10 commissioners. The following subjects were covered: lobbying; awareness; conflict of interests; complaint investigation procedures; revolving doors; and whistleblowing. The authorities also point to the Guide and circulars on lobbying issued by this Authority (see recommendation viii below).
35. As regards confidential counselling, the authorities indicate that in accordance with the relevant provisions of the applicable Codes of Conduct<sup>12</sup>, members of the Government receive such counselling from the Ethics Adviser and consultants-associates – from the Internal Audit Unit of the Presidency.
36. GRECO notes that training sessions have been organised by the Independent Anti-Corruption Authority and attended by a number of PTEFs (including ministers and deputy ministers). This is an excellent development and GRECO trusts that the authorities will continue to ensure that *all* categories of PTEFs follow inception and refresher integrity training courses. The first part of the recommendation can be considered fully implemented.
37. As regards confidential counselling, GRECO takes note of the information submitted and reiterates its consistent position that it is not appropriate to attribute counselling function to a body responsible for investigating misconduct and enforcing the rules of conduct, as this may have a chilling effect. Given the supervisory functions of the Ethics Adviser and the Internal Audit Unit, PTEFs may well avoid seeking advice from these bodies when faced with an ethical dilemma, for fear of subsequent action against them. The fact that another official (the President or a government member) makes the final decision regarding the applicable sanction for misconduct does not mitigate this concern. GRECO underlines that the element of trust is crucial for an advisory mechanism. GRECO therefore invites the authorities to provide information on the measures taken to reform and develop the confidential counselling mechanism, taking these considerations into account. The second part of this recommendation is to be considered not implemented.
38. GRECO concludes that recommendation v has been partly implemented.

#### **Recommendation vi**

39. *GRECO recommended that (i) access to information be subject to an independent and thorough analysis, with a particular focus on the scope of Law 184(I)2017, the exceptions to the right to access information and the application of these exceptions in practice, the*

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<sup>12</sup> Article 11 of the Code of Conduct for Consultants-Associates; Article 16 of the Code of Conduct for Members of the Government

*applicable deadlines, the system of fees and the enforcement of the act; and (ii) in light of the findings of this analysis, additional measures be taken to improve public access to information and a culture of openness within the public authorities, where necessary.*

40. As regards the first part of the recommendation, the authorities inform GRECO that an independent study with a special focus on the scope of Law 184(I)/2017 has been commissioned to the University of UCLAN Cyprus. The study was sent to the Ministry of Justice and Public Order on 4 November 2024. On 7 May 2025, the Information Commissioner presented her comments on the findings of the study (some of which were critical), which the Ministry of Justice and Public Order forwarded to the authors.
41. As regards the second part of the recommendation, on 7 February 2025 the Information Commissioner issued the Code of Practice for the better implementation of Law 184(I)/2017. The Code is aimed at public authorities, journalists and members of the public to explain certain provisions of the law, in particular regarding exemptions, time limits and fees, and how these provisions should be applied in practice by public authorities; to assist citizens in making requests for access; and to assist public authorities in dealing with such requests. The Code is a legally binding document and includes practical examples. According to the Information Commissioner, since the entry into force of Law 184(I)/2017, 267 publication plans have been approved, 76 complaints have been examined, 45 written questions have been answered and educational presentations and campaigns have been organised. In addition, in December 2024, the Commissioner organised a press conference for members of the press to explain the scope and application of Law 184(I)/2017. Two media campaigns (social media, newspapers and radio spots) aimed at improving public access to information and promoting a culture of openness were held at the beginning of 2024 and 2025.
42. GRECO takes note of this information and welcomes the fact that the requisite study has been entrusted to representatives of the academic world. The study contains a detailed analysis of the exceptions to the right of access to information, as well as other issues raised in the first part of this recommendation. Therefore, this part can be considered satisfactorily implemented. As regards the second part of the recommendation, GRECO welcomes the publication of the Code of Practice by the Information Commissioner. This document is thorough and has the potential to improve practice in the implementation of the law in question. GRECO also appreciates various awareness-raising activities of the Commissioner. While taking note of these positive developments, GRECO believes that further measures are required to address the existing legislative and practical shortcomings identified in the Evaluation Report (paragraphs 71-73 – for example, fees charged, a 30-day deadline), which go beyond awareness-raising and clarification. GRECO notes that the Information Commissioner disagrees with a number of findings of the UCLAN study and that it is not clear which of the study's recommendations are going to be taken on board by the authorities<sup>13</sup>. GRECO will keep this issue under review and looks forward to an update in due course (see also footnote 13) This part of the recommendation is partly implemented.

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<sup>13</sup> The authorities presented additional information regarding this recommendation in the course of GRECO's 100<sup>th</sup> plenary meeting. The developments reported, and their effective implementation, will be examined in the next reporting exercise.

43. GRECO concludes that recommendation vi has been partly implemented.

#### **Recommendation vii**

44. *GRECO recommended putting in place an institutionalised mechanism to monitor the quality of the consultation process in order to ensure relevant and timely stakeholder involvement in policy/regulatory development.*
45. The authorities submit that the Council of Ministers, by a decision of 4 January 2024, approved the launch of the e-consultation platform<sup>14</sup> as a single point of public consultation and adopted the revised version of the practical guide<sup>15</sup> developed by the Directorate-General Growth (DGG). The guide emphasises the need to identify and inform stakeholders of the forthcoming consultation process in good time (at the early stages of the preparation of a new draft law). According to the guide, the minimum duration of a consultation should be four weeks. This may be extended in the case of complex issues and accelerated in cases of extreme urgency. The competent authority's response to the input received should be published on the platform in a timely manner, within two weeks of the end of the consultation. Competent authorities are also encouraged to evaluate the effectiveness of the consultations carried out each year, taking into account various factors, including the number and responsiveness of the contributions received from stakeholders, the means and tools used in the whole process and the extent to which the consultations helped to clarify the policy pursued by the legislation under consideration. Public consultation coordinators have been appointed in each ministry/service, who should be aware of and have an overview of the consultations taking place, provide technical support to the public consultation officers responsible for organising and conducting the consultations and ensure overall coordination of their work. A special training session for officials from different ministries and departments was organised in October 2024. According to the DGG, 11 public consultations were carried out during the trial period (until 31 December 2023); during the period 1 January - 19 December 2024, the number of consultations increased to 112, involving 77 services/departments; 792 comments were received from 472 registered external users of the e-platform. The DGG is the central agency responsible for updating the public consultation platform and monitoring all consultations held via it. In accordance with the aforementioned Council of Ministers' decision, all ministries and departments are required to conduct an internal assessment of each procedure using a standardised template. The DGG reviews these reports to ensure quality and timeliness, promote good practice, and improve the consultation process (including through further guidance and training).

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<sup>14</sup> [η-Διαβούλευση](#) (the platform was already launched in 2023, however, it was not a single repository of all public consultations – see paragraphs 74-76 of the Evaluation Report).

<sup>15</sup> [https://e-consultation.gov.cy/wp-content/uploads/2024/01/%CE%9F%CE%B4%CE%B7%CE%B3%CF%8C%CF%82-%CE%94%CE%B9%CE%B1%CE%B2%CE%BF%CF%8D%CE%BB%CE%B5%CF%85%CF%83%CE%B7%CF%82\\_%CE%94%CE%B5%CE%BA%CE%AD%CE%BC%CE%B2%CF%81%CE%B9%CE%BF%CF%82-2023.pdf](https://e-consultation.gov.cy/wp-content/uploads/2024/01/%CE%9F%CE%B4%CE%B7%CE%B3%CF%8C%CF%82-%CE%94%CE%B9%CE%B1%CE%B2%CE%BF%CF%8D%CE%BB%CE%B5%CF%85%CF%83%CE%B7%CF%82_%CE%94%CE%B5%CE%BA%CE%AD%CE%BC%CE%B2%CF%81%CE%B9%CE%BF%CF%82-2023.pdf)

46. GRECO takes note of this information and welcomes the launch of the e-platform, which replaces the previous practice of scattering public consultations across the websites of different ministries. This is undoubtedly a positive development, as is the appointment of public consultation coordinators in each ministry or service. GRECO also notes that the authorities are required to assess each procedure, and are also invited to carry out annual evaluations of the consultations carried out in order to identify lessons learned. Centralised monitoring by the DGG is of paramount importance to develop consistent and good practices across the board. GRECO trusts that, taken together, these measures will produce concrete results in terms of the effectiveness and timeliness of the consultation process.
47. GRECO concludes that recommendation vii has been implemented satisfactorily.

### **Recommendation viii**

48. *GRECO recommended that the Anti-Corruption Authority develops practical guidance for the implementation of the rules on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties seeking to influence governmental processes and decisions.*
49. The authorities indicate that in 2024-2025, the Independent Anti-Corruption Authority issued four circulars<sup>16</sup> on the interpretation and implementation of the Law on the Transparency in Public Decision-Making and Related Matters<sup>17</sup>. Three circulars are addressed to civil servants and public officials and provide detailed explanations of their obligations in the context of meetings with representatives of interest groups. One circular deals with the rights and obligations of interest group representatives. In addition, the Anti-Corruption Agency published a practical guide<sup>18</sup> for the implementation of the above-mentioned law in April 2024. The guide contains the relevant definitions and provides explanations on the scope of the law and the obligations of public officials and interest group representatives. With regard to the obligations of public officials, the guide covers the rules to be followed before, during and after a meeting with an interest group representative, including the submission of a written report.
50. GRECO welcomes the publication of the practical guide on lobbying and related explanatory circulars. In GRECO's view, these materials are sufficiently detailed and provide the necessary guidance both to PTEFs and lobbyists.
51. GRECO concludes that recommendation viii has been implemented satisfactorily.

<sup>16</sup> [Ανεξάρτητη Αρχή κατά της Διαφθοράς](#)

<sup>17</sup> Law 20(I)/2022; see paragraph 77 of the Evaluation Report.

<sup>18</sup> [https://www.iaac.org.cy/iaac/iaac.nsf/All/6592AFF7EF59E552C2258BB0002776FD/\\$file/%CE%A0%CE%A1%CE%91%CE%9A%CE%A4%CE%99%CE%9A%CE%9F%CE%A3%20%CE%9F%CE%94%CE%97%CE%93%CE%9F%CE%A3%20%CE%95%CE%A6%CE%91%CE%A1%CE%9C%CE%9F%CE%93%CE%97%CE%A3%20%CE%A4%CE%9F%CE%A5%20%CE%9D%CE%9F%CE%9C%CE%9F%CE%A5%20\(%CE%9A%CE%91%CE%99%20%CE%95%CE%A0%CE%99%CE%A3%CE%A5%CE%9D%CE%97%CE%9C%CE%9C%CE%95%CE%9D%CE%91\).pdf?OpenElement](https://www.iaac.org.cy/iaac/iaac.nsf/All/6592AFF7EF59E552C2258BB0002776FD/$file/%CE%A0%CE%A1%CE%91%CE%9A%CE%A4%CE%99%CE%9A%CE%9F%CE%A3%20%CE%9F%CE%94%CE%97%CE%93%CE%9F%CE%A3%20%CE%95%CE%A6%CE%91%CE%A1%CE%9C%CE%9F%CE%93%CE%97%CE%A3%20%CE%A4%CE%9F%CE%A5%20%CE%9D%CE%9F%CE%9C%CE%9F%CE%A5%20(%CE%9A%CE%91%CE%99%20%CE%95%CE%A0%CE%99%CE%A3%CE%A5%CE%9D%CE%97%CE%9C%CE%9C%CE%95%CE%9D%CE%91).pdf?OpenElement)

### Recommendation ix

52. *GRECO recommended that the post-employment regime be reviewed in order to improve its transparency and effectiveness and that it be broadened in scope to cover all persons with top executive functions.*
53. The authorities submit that in June 2024, the Presidency instructed the Law Commissioner to prepare, in cooperation with the Ministry of Justice and Public Order and the Ministry of Finance, a draft law amending the relevant law (Law 114(I)/2007). This work is in progress.
54. GRECO notes that a draft law has not yet been submitted for its consideration. GRECO appreciates that the work towards implementing this recommendation has started and looks forward to receiving an update in due course.
55. GRECO concludes that recommendation ix has not been implemented.

### Recommendation x

56. *GRECO recommended (i) extending to all persons entrusted with top executive functions (including deputy spokespersons, the director of the Press Office of the President, advisors to the President and CPTAs hired at the discretion of central government to give advice to persons entrusted with top executive functions) the duty to declare their financial interests, and considering including information on spouses, civil partners and dependent family members (it being understood that the latter information would not necessarily be made public); (ii) that asset declarations be redesigned to provide for further itemisation and better comparability; (iii) that they be submitted online in machine readable form to allow for automated processing and verification; and (iv) that the frequency of the disclosure obligation be reviewed with a view to enhancing the usefulness of the information received and the overall effectiveness of the system.*
57. The authorities report the enactment on 11 July 2024 of two laws: Law no. 112(I)/2024 “On the President, Ministers and Members of Parliament of the Republic of Cyprus (Submission and Control of Personal and Professional Property Statements)”<sup>19</sup> and Law no. 137(I)/2024 “On Certain Officials and Certain Publicly Exposed Persons of the Republic of Cyprus (Submission and Control of Declaration of Assets and Personal and Professional Property Statements)”<sup>20</sup>. While the former law covers the President and members of the Government, the latter law applies to all the other PTEFs.
58. As regards the President and members of the Government (20 PTEFs in total), they are required to submit a declaration of assets and liabilities of the personal and professional property both inside and outside the Republic within four months of assuming office. This declaration covers real estate, investments and various receivables, vehicles and other moveable assets, deposits, loans, credit and debit balances with financial institutions. They must resubmit this declaration if five years have elapsed since the

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<sup>19</sup> [Ο περί του Προέδρου, των Υπουργών και των Βουλευτών της Κυπριακής Δημοκρατίας \(Υποβολή και Έλεγχος Καταστάσεων Προσωπικής και Επαγγελματικής Περιουσίας\) Νόμος του 2024 - 112\(I\)/2024](#)

<sup>20</sup> See paragraph 8 above, footnote 5

previous submission. They must also submit this declaration four months after leaving office, together with a declaration of income and expenditure during their term of office<sup>21</sup> and a statement explaining any increase or decrease in the total of their assets and liabilities during that period. These documents must follow the established template and be sent in pdf format to an electronic address of the Special Parliamentary Committee, which has oversight functions and is responsible for keeping the records and publishing the declarations on its website. The Committee is assisted by the civil servants of the House of Representatives, who review and screen the declarations before forwarding them for automated checks.

59. As regards Government Spokesperson, Deputy Spokesperson, Director of the Office of the President, Director of the Press Office of the President and Secretary of the Council of Ministers (Annex II of Law no. 137(I)/2024 – 5 PTEFs), they are required to submit the same declarations and statements, as the previous category of PTEFs, within four months of assuming office, every five years during their term of office and within four months of leaving office. These documents must follow the established template and be sent in pdf format to an electronic address of the Special Council, which is appointed by the Government. The Council has oversight functions and is responsible for keeping the records and publishing the declarations on its website. It is assisted by the Secretariat of the Council of Ministers. The Secretariat reviews the declarations before forwarding them for automated checks.
60. As regards Commissioners and their deputies appointed by the President or the Council of Ministers and consultants-associates employed by the Government (Annex I of Law no. 137(I)/2024), they must submit a declaration of assets within four months of assuming office, every three years during their term of office and within four months of leaving office. This declaration covers movable and immovable property, substantial economic interests in any business, deposits and loans with banks or financial institutions, debts and liabilities, assets of any kind valued in securities, trusts, bonds, debentures, shares and dividends of own economic interest in private and public companies, rental of safe-deposit boxes in banks or other institutions, income or benefits from insurance contracts, investment products and any other income. The declaration also includes any change in assets that has occurred since the immediately preceding declaration, together with sufficient explanation to justify any change. The declarations must be submitted to the above-mentioned Special Council through a computerised system<sup>22</sup>. The authorities indicate that Law 137(I)/2024 came into force on 28 February 2025; the deadline for submission of first declarations expires on 27 June 2025. To date, 18 PTEFs have started the submission process and 7 of them have completed it.
61. All the above-mentioned declarations and statements shall include information concerning a spouse or partner and dependent family members. This information shall not be disclosed to the public.

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<sup>21</sup> A declaration of income and expenditure is a detailed annual statement containing information for each individual year of the official's term of office.

<sup>22</sup> <https://pothenesxes.gov.cy>



62. GRECO welcomes this substantial upgrade of the declaration regime for the PTEFs. As regards the first part of the recommendation, GRECO commends the authorities' decision to require that information on spouses, partners and dependent family members of PTEFs be included in the declarations. This is a very important step towards ensuring greater transparency in this area. GRECO also notes that the declaration requirements have been extended to all PTEFs. This part of the recommendation has therefore been implemented satisfactorily.
63. As regards the second part of the recommendation, GRECO has examined the new declaration forms, which have a clear lay-out and cover different types of assets, interests and liabilities. In particular, they now cover movable property, thus filling the gap identified in the Evaluation Report (paragraph 128). GRECO therefore finds that this part has been implemented satisfactorily.
64. As regards the third part of the recommendation, GRECO notes that commissioners, their deputies and consultants-associates submit declarations through a computerised system, while a small number of PTEFs (25 in total) send their declarations by e-mail to the competent body. The authorities clarify, however, that the latter's declarations undergo automated checks. GRECO therefore considers this part of the recommendation as implemented satisfactorily.
65. As regards the fourth part of the recommendation, GRECO notes that the applicable law does not provide for regular reporting by the President and members of the Government during their term of office, apart from the obligation to resubmit a declaration if five years have elapsed since the previous submission. As regards the other categories of PTEFs, the frequency of reporting is either every three or five years during their term of office. The authorities emphasise that a declaration of income and expenditure covers each individual year of the official's term of office. GRECO notes, however, that only a small number of PTEFs (25 in total – see paragraphs 60-61 above) submit this type of declaration. In any case, the submission of a declaration covering several years and the submission of several annual declarations are not equivalent from the point of view of transparency and the fight against corruption. GRECO recalls that it specifically recommended "more frequent" - annual - reporting: three years is a rather long period, especially if there has been a significant change in assets (see paragraph 128 of the Evaluation Report). Overall, this part of the recommendation should be considered as not implemented.
66. GRECO concludes that recommendation x has been partly implemented.

#### **Recommendation xi**

67. *GRECO recommended (i) ensuring substantive verifications of financial declarations of persons entrusted with top executive functions; (ii) that sufficient authority, expertise, resources, and independence be provided for this purpose; and (iii) that clear consequences and effective, proportionate, and dissuasive sanctions are applied to guarantee the veracity of information declared, as well as the actual timely filing of a declaration.*

68. The authorities refer to Law no. 112(I)/2024 (Articles 8-13) and Law no. 137(I)/2024 (Articles 9-16; see also recommendation x above). These establish two different verification regimes: one for the declarations and statements submitted by the President and members of the Government, Government Spokesperson, Deputy Spokesperson, Director of the Office of the President, Director of the Press Office of the President and Secretary of the Council of Ministers; and another regime – for the declarations submitted by Commissioners and their deputies appointed by the President or the Council of Ministers and consultants-associates employed by the Government.
69. The declarations and statements submitted by the President and members of the Government, Government Spokesperson, Deputy Spokesperson, Director of the Office of the President, Director of the Press Office of the President and Secretary of the Council of Ministers are sent to the Tax Commissioner for audit (verification of the accuracy and truthfulness of the information contained therein). For the purposes of such an audit, the Tax Commissioner may have access to State records and to the services of any Ministry, office or department of the public service in order to obtain the necessary documents and data. A special investigation is carried out by the Tax Commissioner on the decision of the Special Parliamentary Committee or the Special Council (as applicable), if the results of the audit reveal an unjustified difference in assets or the submission of false, falsified or misleading information. The Tax Commissioner is assisted by officers of the Department of Taxation.
70. The declarations submitted by Commissioners and their deputies and consultants-associates are verified by the Special Council in cooperation with the Tax Commissioner. If the results of this verification reveal an unjustified difference in assets or the submission of false, falsified or misleading information, the Special Council shall initiate an investigation. To this end, it will commission statutory auditors to provide an accounting or financial expert opinion and will cooperate with the services of any ministry, office or department of the public service.
71. As regards sanctions, the authorities indicate the following: if a minister or deputy minister fails to submit the required declarations or statements within the statutory time limit, the President of the Republic shall decide on the consequences. The Code of Conduct for members of the Government, which provides for a sanctions mechanism (see paragraph 31 above), requires them to comply with the financial disclosure requirements. Should the President of the Republic, a Minister or a Deputy Minister fail to submit the required declarations or statements, their names will be published online on the website of the Special Committee<sup>23</sup>. If other PTEFs fail to do so, the Special Council shall impose a fine of up to five thousand euros (EUR 5,000) and up to one hundred euros (EUR 100) for each day of continued failure. Providing false information is a criminal offence punishable by a fine of up to EUR 5,000 or imprisonment for up to one year and/or both. Unjustified assets trigger the application of the Prevention and Combating of Money Laundering Act.
72. GRECO takes note of this information and welcomes the strengthening of the verification mechanism through the above-mentioned legislation. As regards the first

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<sup>23</sup> Article 4(4) of Law no. 112(I)/2024.

part of this recommendation, GRECO notes that the declarations and related statements of PTEFs are subject to verification as to the accuracy and truthfulness of the information contained therein. If irregularities are detected, a thorough investigation is carried out. The Tax Commissioner and other officials involved in this process may request information and assistance from other public bodies. This part of the recommendation is therefore implemented satisfactorily.

73. As regards the second part of the recommendation, GRECO appreciates that for most PTEFs the initial verification (audit) of the declarations and subsequent investigations are entrusted to the Tax Commissioner and statutory auditors, who can provide the necessary expertise. Where the Special Council itself carries out such audits, it may also seek the assistance of the Tax Commissioner. The Department of Taxation assists in this process. GRECO considers that this is a significant step forward and that this part of the recommendation should be considered as satisfactorily implemented.
74. As regards the third part of the recommendation, GRECO is pleased to note that the enforcement mechanism has also been strengthened. In particular, there are sanctions for failure to submit or late submission of declarations. Providing false information is a criminal offence. However, GRECO regrets that the sanctions for non-submission or late submission are not clearly defined with regard to ministers or their deputies (this concerns both Law no. 112(I)/2024 and the relevant Code of Conduct – see also GRECO's analysis of the sanctions under this Code in paragraph 33 above). The question of their liability is left to the discretion of the President. Moreover, no provision is made for the liability of the President in such a case. The only clearly specified measure is the publication of the names of the PTEFs concerned on the Special Committee's website. Although naming and shaming can be effective in certain cases and encourage compliance, it does not constitute a proper sanction. GRECO recalls that it has already pointed out these shortcomings in the Evaluation Report (paragraph 130). GRECO invites the authorities to address these issues with determination. In the meantime, this part of the recommendation is to be considered as partly implemented.
75. GRECO concludes that recommendation xi has been partly implemented.

#### **Recommendation xii**

76. *GRECO recommended that the Anti-Corruption Authority be provided with adequate material, financial and personnel resources to perform its tasks proactively and efficiently with respect to persons entrusted with top executive functions.*
77. The authorities indicate that the Authority's budget for 2024 has increased by 72% compared to the previous year, together with an increase in staff through secondments and the purchase of services. Work is underway to revise the current legal framework in order to increase the number of permanent staff at the Authority. As a result of these measures, the Anti-Corruption Authority is now better equipped to carry out its growing tasks. For example, in addition to investigating a number of complaints, the Authority is now able to conduct ex officio investigations (three have already been carried out). It manages the lobbying register (with 133 registrations so far), runs a training programme to promote integrity awareness and regularly issues practical codes, circulars, etc. The

Cypriot authorities are committed to continue to support the Anti-Corruption Authority. The Office of the Law Commissioner has recently prepared legislative amendments to enable the Authority to recruit its own personnel through independent procedures.

78. GRECO takes note of this information and encourages the authorities to take all necessary regulatory and procedural measures to prioritise the effective increase in the permanent staffing of the Anti-Corruption Authority, especially given the various key tasks it is entrusted to perform<sup>24</sup>.
79. GRECO concludes that recommendation xii has been partly implemented.

### **Recommendation xiii**

80. *GRECO recommended that as regards the dedicated bodies for issues related to the prevention of corruption of persons entrusted with top executive functions (i) measures be taken to streamline their work and that effective institutionalised cooperation, information exchange and feedback processes are developed among them; and (ii) that they operate with an appropriate level of transparency and issue regular reports on their activity which are properly communicated to the public.*
81. The authorities indicate that in June 2024, the Presidency instructed the Law Commissioner to prepare, in cooperation with the Ministry of Justice and Public Order and the Ministry of Finance, a draft law amending the relevant legislation<sup>25</sup> to merge and enhance the following control mechanisms: the Committee for the Investigation of Incompatibility and the Independent Special Committee on the Control of Undertaking Work in the Private Sector. The Law Commissioner was also instructed to develop draft legislative amendments to ensure that the authorities concerned by this recommendation publish annual reports and effectively collaborate with other bodies related to corruption prevention, exchanging information etc. The work on these draft amendments is in progress.
82. GRECO takes note of this information and is encouraged that the work is under way to merge the two above-mentioned Committees. GRECO recalls that it has expressed concerns regarding the multitude of oversight bodies in the anti-corruption area (see paragraph 146 of the Evaluation Report). GRECO has not yet been able to examine the draft legislation and looks forward to receiving an update in due course.
83. GRECO concludes that recommendation xiii has not been implemented.

### *Preventing corruption and promoting integrity in law enforcement agencies*

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<sup>24</sup> As of July 2024, in addition to the Chief of the Authority and the 4 members of the Board, its staff comprised 14 individuals (including 7 on a one-year contract), namely: 5 legal officers, 2 administrative officers, 4 clerical officers, 1 temporary economist, as well as 2 ushers. While financial resources attributed to the Authority have considerably increased, a lack of sufficient human resources has had an effect on its effectiveness. See [EC Rule of Law Report \(2024\)](#), p.11, footnote 88, and p. 14.

<sup>25</sup> Law 7(I)/2008 and Law 114(I)/2007; see paragraphs 134-138 of the Evaluation Report.

#### **Recommendation xiv**

84. *GRECO recommended adopting a coordinated corruption prevention and integrity policy for the police, based on systematic and comprehensive review of risk-prone areas, coupled with a mechanism providing for regular assessments.*
85. The authorities report that a framework and mechanism for risk assessment and risk management have been established, along with the identification of vulnerable/sensitive areas and threats related to integrity and corruption. This is accompanied by targeted mitigation and control measures, which are subject to regular monitoring and the preparation of a relevant report/assessment every six months. The new procedures and measures implemented include vetting processes, targeted inspections, undercover audits, simulated incidents, access controls/checks for members of the Police to electronic databases, member awareness programs and continuous training. In conjunction with these changes, a more active and productive role has been assigned to the Disciplinary Officers of the Directorates/ Units/ Services. For the implementation of this framework and other new control and prevention procedures, as well as the adoption of a coordinated internal control and professional standards policy, the Professional Standards and Inspection Directorate (PSAID) has been reorganised through the amended Standing Chief of Police Order no. 1/86, which defines its new structure, responsibilities and duties. This Chief of Police Standing Order was published on September 19, 2024, on the internal website (portal) of the Cyprus Police. The authorities indicate that this Standing Order is confidential and that only a summary of its contents can be communicated to GRECO.
86. GRECO welcomes that a risk assessment has been carried out by the police, including risk mitigation measures and a mechanism for regular assessment, in line with the different components of the recommendation.
87. GRECO concludes that recommendation xiv has been implemented satisfactorily.

#### **Recommendation xv**

88. *GRECO recommended that (i) in-service training programmes and awareness raising measures on anti-corruption, integrity and professional ethics be developed and provided at regular intervals (covering conflicts of interest and other corruption prevention-related matters) for police officers, taking into consideration their specificity, the variety of duties and their vulnerabilities, including by paying particular attention to ethical leadership training ; and (ii) that the mechanism for providing confidential advice to police officers on ethical and integrity matters be strengthened, by ensuring its confidential nature and encouraging the use of the resource.*
89. The authorities report that in addition to the existing training programme, further targeted lectures have been provided to various categories of the police staff (management, senior executives and officers, disciplinary officers, members in sensitive departments, etc.) and in areas sensitive to issues of corruption. These educational activities are incorporated into the training program of the Cyprus Police Academy for every academic year. The authorities provided the list of training sessions for the

academic year 2024-2025, as well as the attendance rates for the sessions already held. Some of the sessions specifically target managers and police leadership (including Chief Superintendent).

90. The authorities also report that a mechanism for providing confidential advice to police members has been established, based on the new structure and operation of the PSAID. The Members of the Inspection and Prevention Branch of PSAID, who provide advice relating to issues of professional conduct, ethics and integrity, receive specific training and are not involved in investigations and other relevant activities of PSAID. The police staff can directly approach specific/competent members of the PSAID, and several officers have done so (the authorities have no record of the exact number of such consultations). Awareness of this mechanism was raised through the Police Code of Ethics, circulated in 2024, as well as through the training courses.
91. GRECO takes note of this information. As regards training, the authorities report a number of additional training activities integrated into the regular training programme of the Police Academy. Some of these are tailored for the police leadership. GRECO considers this part of recommendation to be implemented satisfactorily.
92. As regards confidential counselling, GRECO recalls that the possibility to seek advice from the PSAID was already available at the time of the evaluation visit, although few officers made use of it (see paragraphs 180 and 182 of the Evaluation Report). GRECO notes the awareness-raising measures in this respect. However, on the basis of the information provided by the authorities, it is unclear whether the situation has changed in a tangible manner and GRECO prefers to keep this issue under review. This part of the recommendation should be considered partly implemented.
93. GRECO concludes that recommendation xv has been partly implemented.

#### **Recommendation xvi**

94. *GRECO recommended introducing additional measures, within the parameters of the Constitution, regarding the appointment and termination of the Chief and the Deputy Chief of police that are based on formal, objective, competitive and transparent criteria and procedures.*
95. The authorities report that the President has appointed a new Chief of police and a Deputy Chief of police, after dismissing the previous ones due to operational failure. In order to comply with this recommendation, the President, through the Government Spokesman, issued a statement justifying his action and choice of candidates, in an effort to make his reasons transparent and to show that the choice was made on the basis of an objective assessment of the candidates' capacity for the position and not on the basis of any personal relationship. The authorities reiterate that the appointment and dismissal of the Chief and Deputy Chief of Police is the President's prerogative,

based on a fundamental provision of the Constitution<sup>26</sup>, which cannot be amended or substituted in any way.

96. GRECO takes note of this information and considers that the above-mentioned public statement explaining the President's choice of the appointed Police leadership is a positive step in the right direction. At the same time, GRECO remains convinced that more can be done to make the selection process more objective and transparent without amending the Constitution. For example, the selection criteria and procedure can be set out clearly upon the commencement of the process based on objective criteria, with due account taken of the constitutional system of mixed representation and the President's prerogatives.
97. GRECO concludes that recommendation xvi has been partly implemented.

#### **Recommendation xvii**

98. *GRECO recommended (i) that measures be introduced to enhance the objectivity (through measurable criteria) of decisions regarding the selection of officers for higher ranks, promotions and transfers, and to provide more transparency to such processes; and (ii) that steps be taken to strengthen the representation of women in all ranks in the police as part of recruitment and promotion policies.*
99. As regards the first part of the recommendation, the authorities indicate that work is in progress to revise the Police (Promotions) Regulations and that a committee has been set up to this end, chaired by the Assistant Chief of Police for Administration and Training. It is envisaged that the amendments to the Regulations will be adopted in 2026.
100. As regards the second part of the recommendation, the authorities argue that the relevant regulations recognise the physiological differences between men and women by setting different standards for each sex and providing for gender-specific criteria for physical fitness tests. The lower recruitment of women compared to men is due to the lower number of women applying for recruitment, which is directly related to the number of women promoted. The experts assigned to the project on the reform of the Police Human Resources Directorate examined the issue and reached the same conclusion. In addition, a conference will be held in 2025 to raise awareness and encourage female police officers to express their interest and participate at all levels.

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<sup>26</sup> See Evaluation Report, paragraph 192: "The GET considers that the issue of the appointment and removal of the Chief and the Deputy Chief of the police deserves further reflection and development. At present the Constitution only says that they are appointed by the President without specifying any further detail on the relevant decisional mechanism in place to ensure objectivity or consultation of relevant stakeholders. The authorities stress that this Constitutional provision is unamendable as it touches upon the system of mixed representation". Article 131 of the Constitution of Cyprus: "1. The Heads and Deputy Heads of the army, the police and the gendarmerie of the Republic shall be appointed jointly by the President and the Vice-President of the Republic. 2. One of the Heads of the army, the police and the gendarmerie shall be a Turk and where the Head of the army, the police and the gendarmerie belongs to one Community the Deputy Head shall belong to the other Community."



101. GRECO takes note of this information and observes that the work on the amendments to the Police (Promotions) Regulations is at an early stage; the first part of the recommendation should therefore be considered not implemented. As regards the gender balance situation within the police, GRECO notes that the Human Resources have considered this issue, and awareness-raising activities have been envisaged. While these initial steps are encouraging, more determined and targeted measures are needed to bring about a substantial change in the figures, such as a deliberate recruitment policy giving priority to qualified female candidates, including at the most senior levels. GRECO also underlines the importance of policies promoting work-life balance, harassment prevention, training, counselling and other measures to promote inclusiveness, as well as effective sanctioning of non-compliance with gender equality legislation. As important work remains to be done, GRECO invites the authorities to continue their efforts, drawing on the best practices of member States that have achieved a significant change in the gender structure of police forces. The second part of the recommendation is therefore partly implemented.

102. GRECO concludes that recommendation xvii has been partly implemented.

#### **Recommendation xviii**

103. *GRECO recommended developing an organisation-wide policy of vetting and regular re-vetting within the police service and ensuring adequate processes for the continual monitoring of employee vulnerabilities.*

104. The authorities indicate that the implementation of the vetting procedure has been established through the amended Standing Chief of Police Order no. 1/86 (see Recommendation xiv, paragraph 87 above). Additionally, the focus of the vetting procedure has been set out in detail in the Project on Professional Standards and Internal Audit, as part of the Program of the Cyprus Police Reform, which is applied by the PSAID. In particular, the vetting focuses on the following: review of personal file; check of criminal or disciplinary record and/or pending cases; check of all the police databases; check of dependency relationships that may lead to a conflict of interest or be incompatible with the role of a police officer; monitoring of the social activity of members and of their related conduct; extraction of information from internal records. Vetting is conducted as deemed necessary, either upon receipt of relevant information by PSAID or in response to risk exposure. It is also conducted on an ad hoc basis in response to inappropriate behaviour demonstrated by a police officer or during the transfer process. Vetting criteria are reviewed every two years.

105. GRECO takes note of this information and welcomes the development of the vetting procedure within the police. GRECO considers it a positive step that vetting is not limited to checking criminal or disciplinary records, but also covers family ties and social activity. However, the authorities do not mention financial aspects as being covered by the vetting process. However, GRECO notes that financial records can be very important for detecting a person's vulnerability to possible corruption risks, for example financial problems arising from a mortgage or personal loan, or bankruptcy of a spouse. GRECO therefore invites the authorities to extend the scope of the vetting procedure to cover

all relevant aspects, such as family, associates, links with third parties, financial and driving records, and previous jobs. GRECO also emphasises that vetting should not rely solely on police databases or internal records, but also benefit from inter-institutional cooperation when necessary. GRECO observes that the reported arrangements do not provide for re-vetting at regular intervals. In this regard, GRECO reiterates its consistent stance in favour of introducing regular vetting, the frequency of which should depend on risk exposure and the required level of security. GRECO encourages the authorities to take this into account. GRECO wishes to keep vetting procedures under review and invites the authorities to submit further information on the above aspects (the scope and regularity of vetting, and inter-institutional cooperation) during the next reporting exercise.

106. GRECO concludes that recommendation xviii has been partly implemented.

**Recommendation xix**

107. *GRECO recommended (i) enhancing the current regime for declarations of financial interests within the police by introducing an obligation in respect of higher rank officers and certain at-risk positions, to declare financial interests in accordance with a predefined format, when taking up their duties and at regular intervals throughout their service; and (ii) to provide for suitable oversight which includes verification of the declarations and the assessment of integrity risks.*

108. The authorities indicate that Chief and Deputy Chief of Police, who are covered by Law no. 137(I)/2024 (see Annex I paragraph 8), must submit a declaration of assets within four months of assuming office, every three years during their term of office and within four months of leaving office (for more details regarding the contents of the declaration, see paragraph 61 above). The declarations are submitted to the Special Council appointed by the Government through a computerised system. They are verified by the Special Council in cooperation with the Tax Commissioner. If the results of this verification reveal an unjustified difference in assets or the submission of false, falsified or misleading information, the Special Council shall initiate an investigation (see also paragraph 71 above). For all police officers, the authorities refer to the existing legal framework on conflicts of interest, incompatibilities (including restrictions on share ownership) and secondary activities (see paragraphs 205-208 of the Evaluation Report). As regards oversight, the authorities point to the role of the Police Internal Affairs Service (see paragraphs 220-226 of the Evaluation Report).

109. GRECO takes note of this information and welcomes the strengthening of the financial disclosure regime for the Chief and Deputy Chief of Police through the recent legislation (No. 137(I)/2024). At the same time, GRECO regrets that no such requirements have been introduced for officers in senior positions or positions with a high risk of corruption (e.g. positions related to public procurement). GRECO considers that rules on secondary activities or incompatibilities, however strict they may be, cannot replace a sound financial disclosure regime. GRECO therefore invites the authorities to take the necessary measures in this respect. As regards the second part of this recommendation, GRECO is satisfied with the verification of the declarations submitted by Chief and Deputy Chief of Police (GRECO refers to its reasoning in paragraphs 73-74 above). The

authorities may wish to draw upon this practice, when introducing financial disclosure requirements for other officers, as appropriate.

110. GRECO concludes that recommendation xix has been partly implemented.

**Recommendation xx**

111. *GRECO recommended streamlining the oversight and accountability of the police, by (i) considering centralising the lodging of complaints through one entry point, with clear guidelines as to how referrals will be made; (ii) establishing an effective system of coordination and cooperation through clear protocols, which are also made known to the public; and that (iii) feedback is given as to the course of the case, and statistics are published, in order to provide an appropriate level of transparency as to how matters are dealt with at each stage of the process.*

112. The authorities inform GRECO that, as part of the reform of the Cyprus Police, a project has been launched to establish a single point of contact between the public and the police. All complaints, enquiries or other communications will be submitted to and handled by an operational and administrative centre, which will operate on a national basis at the Cyprus Police Headquarters. The centre is expected to be operational in 2026. Another relevant project concerning the digitalisation of police procedures and services to citizens is also underway. It is also planned to make public the internal communication and complaint handling procedures. The Statistics Office of the Cyprus Police will publish specific indicators in this respect.

113. GRECO takes note of a number of initiatives that are underway to address this recommendation. GRECO looks forward to receiving information on their full implementation.

114. GRECO concludes that recommendation xx has been partly implemented.

**Recommendation xxi**

115. *GRECO recommended strengthening whistleblower protection, including through dedicated reporting and advisory channels, accompanied by training for all police ranks and regular information on available legal remedies.*

116. The authorities report that in 2024, Law no. 6(I)/2022 on the Protection of Persons Reporting Violations of Union and National Law was amended<sup>27</sup>, *inter alia*, to include further safeguards against retaliation. These amendments were also incorporated into the relevant Standing Order 1/86 of the Chief of Police and the training programme of the Cyprus Police Academy. As a result of these amendments, an external reporting channel was launched on the Police website and an internal one on the Police Intranet. Of the 110 reports received, only two fell within the scope of the aforementioned law. The PSAID is the Police Directorate responsible for implementing the provisions of the aforementioned Law. Its members took part in the “Internal Reporting Channels

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<sup>27</sup> Law 13(I)/2024 of 23 February 2024

Training: Whistleblower Protection Programme”, organised by the Cyprus Academy of Public Administration. Furthermore, members of the PSAID, together with members of the Police Internal Affairs Service of the Cyprus Police, gave lectures on Law 6(I)/2022. Further lectures will be given to police staff in the near future. The Cyprus Police Academy's regular training programme for 2024–25 includes a course on whistleblower protection legislation (this also applies to the modules for managers and police leadership). Moreover, relevant materials were published on the Whistleblower subpage of the Police website. A manual on whistleblowing has also been issued.

117. GRECO takes note of this information submitted and welcomes the legislative amendments strengthening the protection of whistleblowers against retaliation. GRECO is also pleased to note that the Police now has both external and internal reporting channels. Information materials and some training sessions on whistleblowing have been provided, including to the police leadership, as recommended.
118. GRECO concludes that recommendation xxi has been implemented satisfactorily.

#### **Recommendation xxii**

119. *GRECO recommended establishing a process that ensures that cases are decided in a timely and consistent manner and that misconduct is effectively punished.*
120. The authorities indicate that draft amendments to the Police Disciplinary Regulations were prepared to simplify and accelerate disciplinary proceedings. The draft text has been submitted to the Ministry of Justice and Public Order. The adoption of the amended regulations is envisaged in 2026.
121. GRECO takes note of this information. The draft amendments, aimed at simplifying and accelerating disciplinary proceedings, have not been sent to GRECO and are still in the early stages. GRECO looks forward to receiving an update on the amended regulations in due course.
122. GRECO concludes that recommendation xxii has not been implemented.

### **III. CONCLUSIONS**

123. **In the light of the foregoing, GRECO concludes that Cyprus has implemented satisfactorily 6 of the 22 recommendations set out in the Fifth Round Evaluation Report.** Of the outstanding 16 recommendations, 13 recommendations have been partly implemented and 3 have not been implemented.
124. More specifically, recommendations i, ii, vii-viii, xiv and xxi have been implemented satisfactorily, recommendations iii-vi, x-xii, xv-xx have been partly implemented and recommendations ix, xiii and xxii have not been implemented.

125. With regard to top executive functions, significant progress has been made in a number of key areas. The new regulatory framework governing the legal status and employment of consultants-associates of members of the Government has been adopted, as have the Codes of Conduct for members of the Government and consultants-associates, which now cover all PTEFs with the exception of the President of the Republic. Training sessions for PTEFs have been organised by the Independent Anti-Corruption Authority. However, work remains to consolidate all integrity standards and provide the necessary practical guidance. The Code of Practice for better implementation of the Law on the Right of Access to Public Sector Information has been published, but further measures are needed to improve public access to information in the light of the conclusions of the independent study currently being carried out. The launch of the e-platform for public consultation on draft legislation is an important development. The publication of the practical guide on lobbying and related explanatory circulars is another welcome development. The financial disclosure regime of PTEFs and the related enforcement mechanism have been strengthened, but reporting needs to be made more regular.
126. More needs to be done to develop a coordinated strategy for PTEF integrity based on risk assessment. The confidential advice mechanism needs to be reformed to remove disincentives. The post-employment regime needs to be reviewed. The staffing of the Anti-Corruption Agency would benefit from further reinforcement. Finally, the work of the anti-corruption oversight bodies needs to be streamlined.
127. With regard to the law enforcement agencies, GRECO welcomes the strengthening of the financial disclosure regime for the Chief and Deputy Chief of Police and the legislative amendments enhancing the protection of whistleblowers against retaliation. The external and internal reporting channels of the police have been established. GRECO encourages the authorities to pursue a number of reform projects underway. In particular, oversight and accountability of the police need to be streamlined. Targeted action is yet to be developed to address the gender balance in the police and to make the confidential counselling mechanism fully operational. Greater transparency is needed in the selection process for the Chief and Deputy Chief of Police and in all promotion and transfer procedures. Improvements still need to be made to the disciplinary system.
128. In the light of the foregoing, GRECO notes that further progress will need to be made within the next 18 months to achieve an adequate level of compliance with the recommendations. In accordance with Rule 31 revised bis, paragraph 8.2, of its Rules of Procedure, GRECO calls on the head of the delegation of Cyprus to submit additional information with regard to the implementation of outstanding recommendations, namely recommendations iii-vi, ix-xiii, xv-xx and xxii, by 31 December 2026.
129. GRECO invites the authorities of Cyprus to authorise, at their earliest convenience, the publication of this report, and to make a translation of it into the national language available to the public.