

**CONTRIBUTION OF THE MINISTRY FOR THE PROTECTION OF CITIZENS/  
HELLENIC POLICE**

**QUESTION 1.**

Can you provide updates on the adoption, compliance and enforcement of the Guidelines on the Code of Ethics for the Police and the circular dated 10 November 2024 from the Chief of the Hellenic Police?

**ANSWER:**

- A.** The Disciplinary Regulation of the Uniformed personnel of the Hellenic Police is Presidential Decree 120/2008 “Disciplinary law of Police Personnel”, which was published on 02-09-2008 and entered into force on 02-12-2008. The above mentioned Presidential Decree has already been modified with Presidential Decree 111/2019 (A’ 216) “Regulation of matters relating to police personnel and organisation of the Services of the Hellenic Police”, after taking into account the recommendations of the Ombudsman in its annual report (as the national mechanism for investigating incidents of arbitrariness in security forces and detention facility staff) for the year 2018. Despite this, a further modification has been decided. In fact, the need for further important changes emerged due to: a) the new crimes foreseen in the new Penal Code (which entered into force in July of 2019), b) the restructuring of the Hellenic Police per the provisions of Law 4249/2014 as amended with Article 231 of Law 4281/2014, c) the relevant decisions of the European Court of Human Rights, which affect the relationship between criminal and disciplinary proceedings and d) the need to reduce unnecessary administrative investigations, such as those related to injuries sustained outside of assigned duty, which increases unnecessary bureaucracy, etc. The changes were intended to achieve three main objectives: i) improve the service and the broader public interest, particularly by reducing bureaucratic procedures with no substantive content, ii) expedite the delivery of disciplinary justice and iii) ensure fair disciplinary procedures for police officers under investigation, as well as protect the interests of the Service through the proper administration of disciplinary justice and the maintenance of high levels of discipline within the police force.
- B.** Following this, **Presidential Decree 61/2024 was published (GG A’174, 05-11-2024) and entered into force upon its publication.** Presidential Decree 120/2008 on the "Disciplinary Law of Police Personnel," aiming at its modernisation and complete reform. The main pillars being the removal of uniformed personnel who have committed serious criminal and disciplinary offences, the more effective handling of corruption cases, the reduction of bureaucratic procedures and the acceleration in the administration of disciplinary justice. Indicatively, the new regulations:
- i) update the prescribed disciplinary penalties so that they align with the offences outlined in the new penal code,
  - ii) mandate the suspension of personnel against whom criminal and disciplinary proceedings are initiated for particularly serious criminal offences,
  - iii) provide for the mandatory dismissal of personnel convicted by a final decision of a criminal court for felonies and certain particularly serious misdemeanors, regardless of the outcome of the disciplinary case,
  - iv) avoid unnecessary administrative investigation of minor matters such as the loss of a (service) identity card, driver’s license or injury sustained outside the assigned duty and
  - v) prolong the time limits for the possibility of repeating disciplinary trial in the event of a different substantive judgment from the corresponding criminal trial to ensure that the appropriate disciplinary penalty is imposed.

- vi) achieve the general compliance of our country with the decisions of the European Court of Human Rights (ECHR), particularly regarding the relationship between disciplinary and criminal proceedings. Specifically, the binding judgment produced in a disciplinary trial by a final judicial criminal conviction or an acquittal ruling is updated, taking into account relevant decisions of the European Court of Human Rights [Stavropoulos v. Greece (Application No. 35522/04) of 27-09-2007, Kapetanios and Others v. Greece of 30-04-2015 (Applications Nos. 3453/12, 42941/12, 9028/13), etc.], as well as the relevant case law of the Council of State (Council of State 2430/2022, 538/2020, 2096/2019, notably plenary 4662/2012, paragraph 20, etc.).
- C. Subsequently, **on November 10, 2024, a detailed circular order was issued by the Chief of the Hellenic Police**, providing directions and instructions for the effective implementation of the amendments to Presidential Decree 120/2008, introduced by Presidential Decree 61/2024, as well as the overall set of related provisions. Furthermore, on November 28, 2024, a videoconference was held between the relevant officers from the Police Headquarters who handle disciplinary cases and officers from all regional police services of our country dealing with disciplinary matters. The aim was to discuss and resolve practical implementation issues concerning the existing provisions or the new ones arising from the amendment of the Police Personnel Disciplinary Law.
- D. As mentioned in the questionnaire for the Rule of Law Report 2024, within the framework of the 5<sup>th</sup> evaluation round of our country by GRECO, a recommendation was made, among others, to amend the Code of Ethics to enhance the integrity of police personnel. After studying the recommendation to amend the Code of Ethics for police officers, the Ministry of Citizen Protection, under which the Hellenic Police operates, decided to issue a relevant guide (**Guide for police officers' conduct in handling corruption incidents and integrity issues in the Hellenic Police**). This guide will outline the procedures for handling corruption incidents and will be incorporated into the syllabus of the police ethics course which is included in various trainings/seminars.
- E. For the time being, the basic draft of the guide has already been prepared, and any potential additions or changes, as well as its possible approval, are under review. Furthermore, it was decided (by decision No. 38 dated 30-07-2024 of the council of Ministers - action 2.3.21 – GG A' 132/12-08-2024), and the appropriate adaptation to an updated Code of Ethics for Police Officers is currently under review.

## **QUESTION 2.**

Were there any breaches of the Police Code of Ethics in the past year? What disciplinary or other sanctions were imposed? Were any high-ranking police officials involved?

### **ANSWER:**

During 2024 there were violations of the Code of Ethics specifically:

- A. Across all Services of the Corps, appropriate disciplinary action was taken in a total of five thousand seven hundred sixty-two (5762) cases (372 Sworn Administrative Examination under Article 26, 1526 Sworn Administrative Examination under Article 27, 2321 P.D.E of under Article 24, and 1543 direct calls for defense (explanations). In total, one thousand three hundred sixty-seven (1367) police officers were punished [one thousand three hundred five (1305) with final decisions, while for the remaining sixty-two (62), the final decision is still pending].

- B.** A total of eighty-six (86) police officers, Special Guards, Border Guards and fixed term Body Guards, were placed on administrative suspension for reasons of overriding public interest. In addition, twelve (12) police officers and Special Guards were dismissed/discharged, by decision of the competent Disciplinary Council.
- C.** The Disciplinary Councils of the Police Force handled two hundred and twelve (212) cases and issued decisions concerning three hundred and fifty-five (355) police officers, as follows:
- ☐ Sixty [60] police officers received the penalty of dismissal/ discharge
  - ☐ Eighty-six [86] police officers were given other severe disciplinary penalties
  - ☐ Thirty-three [33] police officers received minor disciplinary penalties
  - ☐ Sixty-two [62] police officers were not penalized
  - ☐ Three [3] police officers' requests for reopening disciplinary cases were deemed unacceptable
  - ☐ Two [2] police officers' appeals were found to be procedurally inadmissible
  - ☐ One hundred and thirteen [113] police officers' cases were postponed or suspended
  - ☐ Two [2] police officers case files were returned due to lack of jurisdiction
  - ☐ One [1] police officer's disciplinary prosecution was dropped
  - ☐ One [1] police officer's appeal was deemed unsubstantiated
- It should be noted that the aforementioned numbers are not final, in the sense that the imposed disciplinary penalties may not yet be definite, or the disciplinary trial may be repeated due to an irrevocable acquittal or conviction decision that binds the disciplinary judge.
- D.** There are cases usually involving police station Commanders or Directors of Police Directorates who, although they are officers, are not classified as high-ranking officials. It is noteworthy that in 2024 a presidential decree was published, resulting in the dismissal of a Director of a Police Directorate with the ranking of a Police Director who was involved in a big corruption case (criminal organization etc.), following a final decision by the disciplinary council. Additionally, it should be mentioned that in late 2023 strict disciplinary penalties were imposed on high-ranking officers, concerning operational omissions and shortcomings in the management of incidents involving sports teams fans.
- E.** For 2024, eighty (80) cases were recorded with allegations of abuse - ill-treatment - extreme behaviour of police officers against citizens or racially motivated behaviour against foreigners and other persons who identify themselves or belong to different racial, religious and social groups from them. Of these:
- ☐ Seventy-four (74) cases are pending at the stage of conducting or formulating an opinion or review for adjudication by the competent Police official.
  - ☐ Five (5) cases were passed and sent, before a decision was made, to the Independent Administrative Authority "Ombudsman", as the National Mechanism for Investigation of Arbitrariness Cases, for review and opinion and are pending.
  - ☐ One (1) case was filed.

### **QUESTION 3.**

Can you provide more information on the objective and state of play of the new bill currently under public consultation proposing the establishment of a Directorate of Police Ethics and Internal Control (referred to in Greece's written input p. 63)?

## **ANSWER:**

- A. By the Article 13 of Law 5187/2025** (Government Gazette A 48 - 21.03.2025) "Reorganization of the structure of the Greek Police and upgrading the training of its uniformed personnel - Modernization of the institution of electronic surveillance of suspects, convicts and prisoners on leave - Regulation of issues of prisoners in correctional facilities and other provisions", **the Police Ethics and Internal Control Division was established.**

The aim of the establishment of the Directorate of Ethics and Internal Control at the Hellenic Police Headquarters is to create a structure that will be responsible for the exercise of effective internal control, while at the same time, it is charged with the conduct and control of disciplinary cases, as well as support the operation of the disciplinary councils. It will also provide guidance to all the Services of the Corps and enhance the integrity and professionalism of those serving in the Hellenic Police.

- B.** This Directorate reports directly to the Chief of the Hellenic Police and is responsible for:
- i. the central planning and coordination of all necessary actions for the development and implementation of internal control standards for uniformed personnel for any intentional and attributable violation of the service duty,
  - ii. the conduct of administrative examinations and accountability,
  - iii. the allocation, supervision and control of the personnel who serves with the operational regional services and is responsible for conducting administrative examinations in an objective and professionally diligent manner, and
  - iv. strengthening the integrity of the Corps and promoting high standards of professionalism and accountability in policing.

The Division will be structured into the Police Ethics, Administrative Examinations, Administrative Examinations Control and Disciplinary Council Support Sections.

- C.** The Police Ethics and Internal Control Subdivision of Northern Greece, which will be administratively subordinate to the Police Ethics and Internal Control Division, will operate in Thessaloniki. Its local competence will extend to Northern Greece and will be structured into the Administrative Examinations and Disciplinary Council Support Sections.

Moreover, the Administrative Examination Departments of the General Regional Police Directorates Staff Offices (with the exception of the General Regional Police Directorate of Macedonia), as well as the Administrative Examination Offices of the Police Directorates Staff Offices to the General Regional Police Directorates are subordinate to the Police Ethics and Internal Control Division.

- D.** The Police Ethics and Internal Control Division is subject to supervision by the National Transparency Authority, in accordance with Articles 82 to 103 of Law 4622/2019 (GG A'133), and the Ombudsman, in its capacity as the national mechanism for the investigation of cases of arbitrariness, in accordance with Law 3094/2003 (A' 10).

## **QUESTION 4.**

Are there any other developments in relation to integrity rules or conflicts of interest that you wish to highlight?

## **ANSWER:**

- A.** As stated in the questionnaire for the 2024 Rule of Law Report, within the framework of the 5th round of evaluation of our country by GRECO, a recommendation was made, among others, to amend the Police Code of Ethics to strengthen the integrity of police personnel. Subsequent to this recommendation, the Ministry of Citizen Protection, under which the Hellenic Police falls, has decided to issue a guide on police conduct against corruption incidents and integrity issues within the Hellenic Police. This guide will delineate the process for handling corruption incidents and will be incorporated as part of the curriculum in police ethics courses included in various training/seminars.
- B.** For the time being, a draft guide has been drawn up and potential additions or changes are being considered, along with its possible approval. Furthermore, the adaptation of the aforementioned guide to the updated Police Code of Ethics has been decided (Ministerial Council Act No. 38 of 30-07-2024 – Action 2.3.21 – GGA' 132/12-08-2024) and is currently under review.
- C.** Additionally, it is imperative to acknowledge the unique relationship that uniformed personnel of the Hellenic Police maintain with the State, as they are bound by a distinct set of regulations, encompassing both disciplinary and organisational laws. This framework is further delineated in Article 4 of Presidential Decree 120/2008, which stipulates that the service duty encompasses any intentional and attributable violation of service obligations. The service duty is defined by the obligations imposed on the police officer by the provisions of the Constitution, the laws, the regulations of the Corps, the orders of the Service, as well as the conduct the police officer must maintain both on and off duty due to their status. In this regard, every police officer is obliged to comply with the laws of the State, bearing disciplinary responsibility for actions that are defined as disciplinary offences, as well as for actions that may lead to criminal or administrative penalties. In essence, any violation of the provisions of any law constitutes a disciplinary offence. Subordination to the law and disciplinary devaluation are carried out according to the respective provisions. The Police Code of Ethics contains general principles and guidelines for the overall behaviour of police officers. On the other hand, the number of actions/omissions provided for in the disciplinary law for police personnel and in the laws of the state in general is broader, but at the same time, these actions are specific (clear). Consequently, any violation of the rules of law constitutes at the same time a breach of the principles of the Police Code of Ethics. It is therefore impossible for a uniformed officer to be considered to have violated the general principles of the Police Code of Ethics without having violated a rule of law, whether that violation is only condemned by disciplinary law or whether it also carries criminal or administrative penalties. In practice, therefore, uniformed personnel are punished based on the rule of law they violated through their action or omission, which does not constitute a provision of the Police Code of Ethics.

## **QUESTION 5.**

Are there any developments or challenges to highlight in relation to the cooperation between the police and the economic and financial crime prosecution services and the EPPO or the resources allocated to EPPO cases, including secondments from the police?

**ANSWER:**

- A.** An information meeting - workshop was organized on 17 March 2022 by the Hellenic Police Headquarters between the EPPO and the competent services of the Hellenic Police, during which:
- i.** the representatives of the European Public Prosecutor's Office presented the institutional framework governing its operation,
  - ii.** the areas of cooperation with the Hellenic Police as well as the assistance that shall be provided by the Hellenic Police to the work of the European Public Prosecutor's Office as foreseen by law were highlighted; and
  - iii.** emphasis was placed on practical issues being specified (methodology, deadlines, tools, handling, etc.).

The participants in this meeting were: the European Public Prosecutor, four (04) European Delegated Prosecutors on behalf of the European Public Prosecutor's Office and two (02) officials on behalf of the Central Office in Luxembourg.

The Hellenic Police was represented by the Directors of the Public Security Division /Hellenic Police Headquarters, the International Police Cooperation Division/ Hellenic Police Headquarters, the Financial and Economic Police Division, the Heads of Organized Crime and Trafficking in Human Beings, Property Rights Protection, Cultural Heritage and Environment Sub-Directorates of the General Police Directorate of Attica accompanied by Police Officers from their Services.

In addition, the Directors of the Cyber Crime Division, Financial and Economic Police Sub-directorate of Northern Greece, the Deputy Head of Organized Crime and Trafficking in Human Beings Sub-directorate of the General Police Directorate of Thessaloniki, the Head of Property Rights, Cultural Heritage and Environment Sub-directorate of the General Police Directorate of Thessaloniki along with officers from the above mentioned Services participated online.

- B.** The names of the contact persons with the European Delegated Prosecutors in Athens were designated both at executive level (Public Security Division/Hellenic Police Headquarters) and at operational level (Financial and Economic Police Division, Property Rights, Cultural Heritage and Environment, Organized Crime and Trafficking in Human Beings Sub-directorates of the General Police Directorate of Attica) with a view to develop cooperation and provide assistance.

In this regard, it should be noted that pursuant to presidential decree 29/2024 the aforementioned operational Services have been incorporated into the Organized Crime Directorate, the operation of which started on October 21, 2024.

- C.** The request by the Office of European Delegated Prosecutors for the participation of a total of six (06) members of the Hellenic Police Corps coming from the Cybercrime, Financial and Economic Police and Forensic Science Divisions in a briefing event at the European Public Prosecutor's Office headquarters (Luxembourg, 06-07/06/2023) was met.
- D.** A police official from the Criminal Organizations and Transnational Affairs Department/Organized Crime and Trafficking in Human Beings Sub-directorate of the General Police Directorate of Attica was appointed and seconded as a Special Scientist in the Office of the European Public Prosecutor.

- E. Public Prosecutor's orders were executed by the competent Services of the Hellenic Police (Organized Crime Directorate (former Financial Police) and Forensic Science Division/Digital Evidence Section) and requests for assistance to the Office of European Delegated Prosecutors were fulfilled. In the context of a specific operation, representatives of these Services participated in operational meetings organized by the European Public Prosecutor's Office, with a view to ensuring uniform handling of emerging issues (including the examination of digital evidence) by the participating Member States.
- F. As regards further information on the cooperation developed at operational level, the competent authority shall be the Organized Crime Directorate.
- G. In addition, according to Article 1 paragraph 12 case b of the 29/2024 Presidential Decree on the "Establishment of the Organized Crime Directorate and amendment of the provisions of the 178/2014 Presidential Decree on "Organization of the Hellenic Police Services", the Department for the Prosecution of Illegal Traffic and Trafficking of Objects is responsible for prosecuting illegal import, export, trafficking of goods and selling of objects or other items, especially fuel, tobacco and weapons, and for the investigation and prosecution of crimes which bear the characteristics of organized crime, in particular the illicit trafficking and adulteration of goods and other products, which have an adverse effect on public revenue and significantly affect the smooth functioning of the market. In this framework the Trafficking in Human Beings and Objects Smuggling Sub-directorate following an order for investigation issued by the European Delegated Prosecutor of the Hellenic Office of the European Delegated Prosecutors while a transborder investigation was being conducted by the Office of the European Delegated Prosecutors of Paris (France) of EPPO which concerned smuggling affecting the economic interests of the EU, forgery/use of forged documents and possible cross-border VAT fraud: a) collected data on the investigated companies using open and closed sources and verified the use of facilities at Piraeus and Aspropyrgos by these companies by carrying out on site investigations, b) participated in a meeting held at the premises of the Hellenic Office of European Delegated Prosecutors during the evening hours on 12/11/2024 with the European Delegated Public Prosecutor, the French Investigators of the French National Anti-Fraud Office (ONAF), representatives of the European Public Prosecution Office (Luxembourg) and a Police Officer from the Forensic Science Division and c) implemented the operational planning of the 13/11/2024 investigations that resulted in finding and confiscating a number of documents and digital data, while it also examined a witness as ordered, the day after the investigations were carried out.

#### **QUESTION 6.**

Could you elaborate further on the new Directorate for Combating Organized Crime and how this affects the investigation of corruption? Will the Financial Crimes Investigation Division still be responsible for investigating corruption offences? Has there been a shift in resources to or away from corruption investigations?

#### **ANSWER:**

The incorporation of the Financial and Economic Police Division into the Organized Crime Directorate (D.A.O.E.) as Financial Crime Sub-Directorate was done in order to emphasize the financial dimension of organized crime. However, there are still provisions for actions to be taken by it falling within its competencies to investigate and combat corruption offences. In particular,

- A. The Public Property and European Resources Department is responsible for:
  - i. cases of misuse, misappropriation or damage to public or EU property,

- ii. the irregular or illegal management of Union or State resources, funding and aid,
  - iii. cases directly or indirectly related to supplies, services and works of the entities of the wider public sector, as specifically provided for in case a' of par. 1 of Article 14 of Law No. 4270/2014 (G.G.A' 143). It is also responsible for legal persons governed by private law subsidized by the state or Union budget which by their criminal actions, in particular fraud (Articles 386 paragraph 2, 386A paragraph 3 and 386B of the Penal Code), misappropriation (Article 390 paragraph 2 of the Penal Code), corruption (Articles 235, 236 and 237A of the Penal Code), active and passive bribery (Articles 235 and 236 of the Penal Code), embezzlement (Article 375 par. 3 of the Penal Code), false certification (Article 242 par. 5 of the Penal Code), damage or adversely affect the economic interests of the public or the wider public sector or the EU. Within its competencies is any other illegal act of national or cross-border nature, in particular as provided for in Articles 21 to 26 of Law No. 4689/2020 (G.G. A' 103), which threatens or seriously damages public property or EU property.
- B.** The Economy Protection Department is responsible for other economic offences provided for in specific criminal laws, the commission of which damages public revenues and causes significant market malfunctions,
- C.** The Social Security Department is competent for:
- i. cases that in particular due to illegal prescriptions, issuing of false medical opinions and certifications, overcharging for medicines, medical equipment, devices and materials cause financial damage to organizations, institutions, funds, social security and welfare services, as well as hospitals, services and medical care providers of the insurance agencies and the public sector in general;
  - ii. cases involving the use of fictitious, falsified or counterfeit data, documents and medical opinions for the purpose of providing health services to non-beneficiaries or the receipt of illegal pensions and other benefits from any insurance agency and social security institution.

Therefore, not only does it continue to investigate corruption cases, but it does so in the common framework of a special Directorate dedicated to the fight against organized crime.

In addition to this Directorate, the main service for dealing with corruption cases in general, and especially when no organized criminal activity is involved, is the Internal Affairs Division.

"When another police Service conducts, pursuant to Article 243 par. 2 of the Code of Criminal Procedure, preliminary investigations for criminal acts provided for in paragraph 2 of this article that have been committed by police officers, as well as by employees and officials of the public sector, employees or officials of the European Union or International Organizations operating in the Greek territory, it is obliged to immediately inform the Internal Affairs Division in writing, sending a document, which is not communicated to other services or authorities. The other authorities must inform the Internal Affairs Division accordingly."

## **QUESTION 7.**

Following the changes to the law on asset declarations in August 2024 (Law 5130/2024), what are your views on the reduction in the retention period of declarations from 15 to 5 years from the end of the year of submission of the declaration (Art. 13)? Do you think this could have a negative impact on investigations of corruption offences or of illicit enrichment (unexplained wealth) as

the information will no longer be available to investigators and prosecutors and may result in many case dismissals?

**ANSWER:**

We refer to the reply given by the Ministry of Justice.

**QUESTION 8.**

Similarly, on asset declarations, what was the rationale for reducing the time limit for a wide range of public officials to submit a declaration after the end of their term of office from 3 years to 1 year (Art. 8)? Does not this go against the principles of transparency that the 2023 law was meant to increase?

**ANSWER:**

We refer to the reply given by the Ministry of Justice.

**QUESTION 9.**

Are there any developments / challenges that the police face to fight corruption and economic crime concerning (i) the level of (human, technical, financial) resources and (ii) legal, procedural or other issues?

**ANSWER:**

- A.** Organized financial crime is a long-standing threat to citizens, state institutions, businesses and the economy as a whole, while the need for coherent and cooperative action at national, European and international level is a key factor in tackling it.

Criminal organizations, which are becoming increasingly complex and sophisticated, not only manage to evolve in an ever-changing environment, but also become more specialized, with experienced and capable operatives at their disposal, thus making the task of the law enforcement authorities more difficult. The complex nature of organized economic crime and the diversity of its manifestations across the whole range of economic activity make it difficult to assess the true extent of its impact.

Economic crime takes many forms such as fraud, embezzlement, corruption, tax evasion, trafficking, smuggling, gambling - illegal betting, and money laundering.

- B.** In particular, the fight against money laundering has been a focus of national, European and global attention in recent years. The prosecuting authorities are called upon, with the means provided by their legal arsenal, to include in their investigations the financial investigation of the cases they are dealing with, so as to achieve comprehensive and complete control, which will lead both to the monitoring of the flow of money (follow the money) and to the seizure of the proceeds from the criminals, through the immediate freezing of the illegally acquired property.

Money laundering is a horizontal criminal activity, the basic prerequisite of which is the existence of a predicate offence, without, of course, excluding the action of criminal organizations and/or individuals, with the sole purpose of money laundering their profits

made by their collaboration with criminal organizations, which are active in serious and organized crime.

It has been observed that criminal networks choose to legalize their criminal proceeds by opening and using multiple bank accounts in different countries, buying real estate, establishing offshore companies, exploiting legitimate business structures, using informal capital transfer systems (mainly hawalla, especially in cases of facilitating illegal immigration), exploiting gambling, using cash couriers, crypto currencies, etc., which cause difficulties in the successful handling of cases and the dismantling of criminal groups

In particular, the legal framework for the provision of information for judicial use differs in EU Member States and in third countries cooperating with Europol. In the majority of them (including our country), a European Investigation Order or a request for mutual legal assistance is required to obtain the information (bank accounts, etc.) necessary for the investigation of the cases concerned. Consequently, when investigating such cases, a sufficient period of time is required to complete the necessary preliminary investigations.

- C. At EU level, a number of actions have been taken to effectively combat money laundering, culminating in the new AML reform package, which aims to strengthen the framework for preventing and combating money laundering and terrorist financing, to ensure effective and homogeneous supervision, to enhance cooperation and exchange of information between Financial Intelligence Units.
- D. As far as our country is concerned, a number of initiatives have also been taken to combat money laundering.

In particular, the Strategy Committee (Article 8 of Law 4557/18) together with the Central Coordinating Body of the Ministry of Economy and Finance (Article 7 of Law 4557/18) constitute the country's competent mechanism for identifying, assessing, understanding and mitigating the risks of money laundering, terrorist financing and proliferation of weapons of mass destruction. This dual mechanism incorporates the coordination and national cooperation requirements of Directive 2015/843 (AMLD IV).

Under the umbrella of the Strategy Committee, actions have been launched to combat money laundering, based on initiatives/obligations stemming from the EU and international legal framework (F.A.T.F. recommendations, European Commission requirements, etc.).

More specifically:

- i. Greece has transposed the relevant European Directives (Directive 2015/849, Directive 2018/843 & Article 3 of Directive 2017/2019). The institutional framework currently in place in Greece is based on Law 4557/2018 (GG A' 139), as amended in particular by Law 4734/2020 (A' 196) and Law 4816/2021 following the transposition of Directive 2018/1673.

It should be noted that:

Active and passive bribery of political and judicial officials under Articles 159, 159 and 237 of the Penal Code, as well as active and passive bribery of an employee under Articles 235 and 236 of the Penal Code,

Trading in influence-intermediaries and active and passive bribery in the private sector under Articles 237A and 396 of the Penal Code, as well as active/passive bribery for the purpose of altering the result of a match under Article 132 of Law 2725/1999 (GG A' 121), and other economic/financial offences, are considered predicate offences under Law 4557/2018 and, consequently, all actions undertaken are focused on combating these offences.

- ii. Directive(EU) 2018/1673 of the European Parliament and of the Council of 23 October 2018 was transposed into Greek law by Law 4816/2021 on combating money laundering by criminal law, accelerating the administration of justice and other urgent provisions.
- iii. Directive (EU) 2019/1153 of the European Parliament and of the Council laying down rules facilitating the use of financial and other information for the prevention, detection, investigation or prosecution of certain criminal offences, and repealing Council Decision 2000/642/JHA was transposed into Greek law by Law 4920/2022.
- iv. Greece is a member of the Financial Action Task Force (FATF), thus ensuring alignment with international standards and recommendations. In 2019, our country was evaluated by the FATF and placed in the first “regular follow-up” category of countries for demonstrating a high level of compliance with FATF’s recommendations and an effective system for the prevention and suppression of money laundering and terrorist financing.
- v. Furthermore, in the context of the EU law imperatives:

There qui site Registers, such as the Central Register of Real Beneficiaries and the Centralised Bank Accounts Register, have been established. The Central Register of Real Beneficiaries is accessible by all relevant services of the Hellenic Police through the Police On Line system and the Interoperability Centre of the Ministry of Digital Governance due to the concerted efforts of the Public Security Division and the Information Technology Division of the Hellenic Police Headquarters. The Centralised Bank Accounts Register, which has been operating in our country since 2013, is directly accessible by the Financial and Economic Police Division – currently Financial and Economic Crime Sub-Directorate of the Organised Crime Directorate (DAOE).

A special threat assessment report on money laundering and terrorist financing has been prepared (October 2018 – click here to access the report: <https://www.astynomia.gr/file/2021/01/2021-enexyrodaneistes5.pdf>) and is currently being updated. In this report, corruption and economic/financial and tax offences have been included in the offences with the highest threat level as to money laundering. The remaining offences that have been included in this category are (in alphabetical order) crimes against property, migrant and refugee smuggling and drug trafficking. Cooperation with the Anti-Money Laundering Authority and other relevant authorities and bodies has been strengthened.

Moreover, information and data are exchanged with fund transfer intermediaries. It should be noted that such companies are not considered as financial institutions and are therefore not covered by the banking secrecy.

In this context, our country has a robust institutional framework in place to combat money laundering. This includes mechanisms designed to safeguard the financial sector against such activities (e.g. the mandatory reporting of suspicious transactions to the Anti-Money Laundering Authority), as well as awareness of the threats posed by its use.

vi. Furthermore, the Public Security Division/Hellenic Police Headquarters had taken steps to facilitate direct access for personnel of the Crime Against Life and Property Sub-Directorate, the Drug Enforcement Sub-Directorate and the Organised Crime and Trafficking in Human Beings (THB) Sub-Directorate of the Attica Security Police Directorate. In accordance with Presidential Decree 29/2024, the said Sub-Directorates have now been incorporated into the Organised Crime Directorate (DAOE) and the System of Bank Account and Payment Account Registers, pursuant to the provisions of Article 38 of Law 4920/2022 (GGA' 74 / 15.04.2022) "Part II Transposition of Directive (EU) 2019/1153 of the European Parliament and of the Council on establishing rules facilitating the use of financial and other information for the prevention, detection, investigation or prosecution of certain criminal offences, and repealing Council Decision 2000/642/JHA".

In this regard, it should be noted that:

Direct access to the aforementioned Register is only possible in cases where banking secrecy has been lifted, in accordance with the applicable legislation.

This process has added value for the said operational services, as it reduces the response time for banking institutions to provide the requested data through a digitised and automated process.

In addition, in accordance with paragraph 1, subparagraph η' of Article 2 of Presidential Decree 65/2019 (legislative framework of our Service), the Internal Affairs Agency of Law Enforcement Forces operates a Technical Resources Office. The remit of this Office is the provision of the necessary technical support, using modern technical equipment, in the investigation of cases, where necessary.

The Technical Resources Office is comprised of dedicated personnel from our Service who possess specialised knowledge in technical matters, proficiency in information systems and experience at the operational level. During operational action, the necessary systems are used, always with the agreement of the General Prosecutor to the Court of Appeals who supervises the Internal Affairs Agency for Law Enforcement Forces and following the issuance of the relevant legislative order.

To facilitate optimal functionality and continuous growth, the Office is regularly upgraded with the most advanced technological solutions available, always in compliance with the legal framework in force and with the public interest as guiding principle.

Furthermore, the personnel of the Service, through various training programmes and the exchange of knowledge and practices with other services/bodies, pursues continuous training on subjects and practices related to the Service for the purpose of enhancing its effectiveness and efficiency.

Finally, the Internal Affairs Agency for Law Enforcement Forces is subject to a specific legislative framework and is directly supervised by a senior prosecutor, thus ensuring that it operates effectively within the framework of legality.

**QUESTION 10.** Could you please elaborate on / contextualise the data provided in Greece's written input (table D Annex I) on corruption cases in the police? Were there any cases referred to court or any convictions?

**QUESTION 11.** How many whistleblower reports on corruption have you received in the past year and what was the follow-up? Are you concerned that the lifting of the witness protection

status in the Novartis case last October may have a chilling effect on anyone wishing to report allegations of corruption in future?

### **ANSWER (QUESTIONS 10 & 11):**

In 2024, the Internal Affairs Agency for Law Enforcement Forces received a total number of one thousand three hundred and twelve (1312) complaints about corruption offences, conducted six hundred and seven (607) preliminary enquiries to ascertain or confirm criminal offences relating to corruption, solved fifty-one (51) cases of criminal offences “in flagrante delicto” falling within the competence of our Service and made one hundred and eighty seven (187) arrests.

Indicatively, in 2023, the Internal Affairs Agency for Law Enforcement Forces received nine hundred and ten (910) complaints of corruption, conducting five hundred and twenty-four (524) preliminary enquiries to ascertain or confirm criminal offences related to corruption. As a result, thirty-six (36) cases of criminal offences “in flagrante delicto” falling within the competence of our Service were solved and a total of one hundred and forty-three (143) arrests were made. Furthermore, in 2022, the Agency received a total of seven hundred and seventy-two (772) complaints, solved twenty-three (23) cases of criminal offences “in flagrante delicto” and made fifty-one (51) arrests.

Below are detailed statistics classified by type of offence and area of interest, concerning the activities of the Internal Affairs Agency for Law Enforcement Forces for the year 2024. Out of a total of fifty-one (51) case-files formed for offences “in flagrante delicto”, in addition to the offence of breach of duty which is included in the majority of the said offences, there are, among others, sixteen (16) case-files relating to passive bribery by an employee, fourteen (14) case-files relating to violations of the Law on Drugs, four (4) case-files relating to fraud, three (3) case-files relating to extortion, two (2) case-files relating to theft, two (2) case-files relating to torture, two (2) case-files relating to violation of the Law on Weapons, two (2) case-files relating to the enforcement of prosecution documents, one (1) case-file relating to violations of the Law on Aliens, one (1) case-file relating to robbery, one (1) case-file relating to forgery, one (1) case-file relating to sex trafficking, one (1) case-file relating to violations of the Customs Code, one (1) case-file relating to violation of professional secrecy. Of the 187 individuals arrested, thirty-five (35) were police officers, two (2) were coast guard officers, forty-eight (48) were civil servants, two (2) were fire service officers and one hundred (100) were private individuals. In sixteen (16) of the fifty-one (51) case-files formed for offences “in flagrante delicto”, the perpetrators had established a criminal organisation with a strict operational and hierarchical structure.

Regarding the prosecutions for the aforementioned years, and since the annual report for 2024 is still in progress, please find below the data collected for the years 2022 and 2023:

In 2022, the Internal Affairs Agency for Law Enforcement Forces was informed (by April 2023) by the relevant prosecuting authorities (*Article 1, paragraph 6 of Law 2713/1999*) that criminal prosecution had been initiated against **127** perpetrators. The prosecution was related to cases dealt with by the Internal Affairs Agency for Law Enforcement Forces and included the following: **-78-** cases against police officers, **-6-** cases against special guards, **-3-** cases against coast guard officers, **-10-** cases against civil servants, **-2-** cases against civilian personnel serving with the law enforcement forces and **-28-** cases against private individuals. It is important to note that the 127 individuals mentioned above were prosecuted for more than one offence, as outlined below:

- **Hellenic Police personnel: 134**
- **Private individuals: 77**
- **Hellenic Coast Guard personnel – Personnel serving with the Ministry of Maritime Affairs and Insular Policy: 8**

- **Civil servants: 26**

In 2023, the Internal Affairs Agency for Law Enforcement Forces was informed (by February 2024) by the relevant prosecuting authorities (*Article 1, paragraph 6 of Law 2713/1999*) that criminal prosecution had been initiated against **-334-** perpetrators. The prosecution was related to cases dealt with by the Internal Affairs Agency for Law Enforcement Forces and included the following: **-68-** cases against police officers, **-4-** cases against special guards, **-3-** cases against coast guard officers, **-2-** against fire service officers, **-27-** officers against civil servants and **-230-** against private individuals. It is important to note that the 334 individuals mentioned above were prosecuted for more than one offence, as outlined below:

- **Hellenic Police personnel: 184**
- **Private individuals: 530**
- **Hellenic Coast Guard personnel – Personnel serving with the Ministry of Maritime Affairs and Insular Policy: 22**
- **Fire service personnel: 5**
- **Civil servants: 81**

**TABLE OF STATISTICS**  
**(YEARS 2022, 2023 AND 2024)**

| <b>Course of Complaints</b>       | <b>2024</b> | <b>2023</b> | <b>2022</b> |
|-----------------------------------|-------------|-------------|-------------|
| <b>Total number of complaints</b> | 1312        | 910         | 772         |
| <b>Preliminary enquiries</b>      | 607         | 524         | 592         |
| <b>Arrests</b>                    | 187         | 143         | 51          |
| <b>Case files formed</b>          | 51          | 36          | 23          |

The current legislative framework sets out the status of witness protection in Article 9 of Law 2928/2001. This provision outlines that measures that may be taken during criminal proceedings for the acts of formation of or participation in an organisation under paragraph 1 of Article 187 of the Penal Code and for related acts, in order to effectively protect material witnesses, persons who, under Article 187A of the Penal Code, assist in the disclosure of criminal activities or their relatives from possible revenge or intimidation. During the hearing, the witness whose identity has not been disclosed shall be called by the name given in the report of his/her examination. If a prosecutor or a party requests the disclosure of the witness's real name, the courts shall give its reasons for deciding whether to disclose it or not. The court may also order disclosure on its own motion, as set out in Article 354 of the Code of Criminal Procedure.

## **QUESTION 12.**

What are the sectors most at risk of corruption? Have you noticed any particular or changing trends in the high-risk sectors in the past year? What about corruption as an enabler of organised crime?

### **ANSWER:**

- A.** The Public Security Division of the Hellenic Police Head quarters is responsible for the preparation of an annual report on serious and organised crime in Greece, in accordance with Article 11 of Law 3875/2010 on the “Ratification and Implementation of the United Nations Convention against Transnational Organised Crime and its three Protocols and related provisions”. Open versions of these reports can be found on the Hellenic Police’s official website (<https://www.astynomia.gr/statistikes-epetirides/statistika-stoicheia-2/etisies-ektheseis-organomenou-egklimatos/>). In preparing these reports, due consideration is also given to the matter of corruption of state officials as a means used by criminal groups to facilitate their activities.
- B.** As outlined in the 2023 report on serious and organised crime in Greece, a limited number of corruption cases per year (ranging from 8-11 cases out of the total cases per year) were identified over the years 2019-2023, with no apparent increase. The most prevalent form of corruption across all years is opportunistic, primarily involving lower-level civil servants. This form of corruption primarily involves the offering of bribes to individuals who also function as members of criminal groups, which means that they also obtain part of the profits. The state officials found to be corrupt come from all state authorities (Hellenic Police, Hellenic Coast Guard, Independent Public Revenue Authority and local authorities), a fact that was also detected in previous years. This demonstrates the ease with which criminal organisations can infiltrate all state services, depending on the objective they wish to achieve.
- C.** In 2024, the Internal Affairs Agency for Law Enforcement Force implemented the “in flagrante delicto” procedure in **51** cases. This resulted in the arrest of a total of **187** individuals, including **35** police officers, **2** coast guard officers, **2** fire service officers, **3** medical doctors, **45** civil servants and **100** private individuals. Of the arrests, **123** involved individuals associated with criminal organisations. In **2023**, the “in flagrante delicto” procedure was implemented in **36** cases, resulting in the arrest of a total of **143** individuals, including **31** police officers, **3** coast guard officers, **2** fire service officers, **1** medical doctor, **13** civil servants and **93** private individuals. Of these arrests, **105** involved individuals associated with criminal organisations.
- D.** The following table illustrates the percentage change in the complaints against specific sectors/agencies compared to the total complaints (per year) received by the Internal Affairs Agency for Law Enforcement Forces over the years 2023-2024.

| Sector/agency against which a complaint was filed | 2023 | 2024 | Percentage change |
|---------------------------------------------------|------|------|-------------------|
| Hellenic Police personnel                         | 504  | 644  | -6.2%             |
| Hellenic Coast Guard personnel                    | 48   | 62   | -0.6%             |
| Fire Service personnel                            | 13   | 20   | +0.07%            |
| Civil servants                                    | 192  | 335  | +4.4%             |

These complaints do not concern cases involving private individual and cases involving both police officers and civil servants.

### **QUESTION 13.**

Are there any policy or legislative developments on the prevention or repression of corruption that you would like to bring to our attention? Have you observed any charging trends in the corruption high-risk sectors in the past year?

### **ANSWER:**

The answers to questions 1 and 3 are relevant. On behalf of the Ministry of Citizen Protection the developments concern:

- a. The Amendment of the disciplinary law for police personnel, which was enacted with Presidential Decree 61/2024 (see the relevant answer to question 1).
- b. Submission of a draft law regarding the restructuring of the Hellenic Police, which provides for the establishment of a new Service, namely the Directorate of Ethics and Internal Control (see the relevant answer to question 3).

### **QUESTION 14.**

CSOs and journalists claim that there is unjustified use of violence by the police during demonstrations. What are your views?

### **ANSWER:**

- A. The new institutional framework for assemblies as legislated in 2020, and the new philosophy of their management by the police, have shaped a fundamentally different culture aimed at more effectively safeguarding and protecting assemblies and facilitating the legitimate exercise of the right to assemble, without disrupting socio-economic life or causing incidents and destruction.

This new institutional culture has created the need to adapt the operational functioning of the Hellenic Police. It is a new Modus Operandi with two main axes: a) expanding the flexibility and b) reducing the intensity with proportionality as one of the main components of reaction. Emphasis is placed on communication with the assemblers, on prevention and deterrence of intrusions in assemblies and limiting the repressive action of the police.

The new institutional framework is based on one Law and two Presidential Decrees:

- Law 4703/2020, “Public outdoor assemblies and other provisions”.
- Presidential Decree 73/2020, “Regulation of public outdoor assemblies”.
- Presidential Decree 75/2020 “Use of surveillance systems with audio or image recordings in public spaces”.

The new institutional framework is based on continuous communication between the police and the organizers of an assembly, which starts with the obligation to notify the relevant Police Authority of the intention to organize a public, open-air assembly. Important provisions and innovations in this are the police mediators, specially trained officers and the unarmed Assembly Management and Demarcation Team, (ODOS), which is mainly composed of young female officers. Each police officer individually, as well as each team as a whole, which is utilized for the management of assemblies is well trained and equipped according to its mission and is subject to the designated hierarchical control.

The Hellenic Police Headquarters places particular emphasis on further education and continuous training of the personnel and the teams, in individual specialized schools concerning the operational function of the groups they belong to, as well as in joint seminars and exercises, in order to ensure interoperability during the overall management of public outdoor assemblies.

**B.** Furthermore, the protection of reporters during their presence at the assemblies-gatherings, is ensured in accordance with provisions in the National Plan for the Management of Public Outdoor Assemblies, as issued and published on 21/01/2021, specifically indent 3.3 of chapter “Communication and Information of the Organizer and the Participants”, where the following are defined:

- The presence of reporters is an important factor during assemblies. In the framework of the new planning, the presence and protection of reporters during assemblies is handled with increased attention, so that their unhindered work ensures the right of citizens to be informed, and also avoid incidents and injuries against them.

- The security plan for the assembly includes safeguarding the physical integrity of reporters who may be at the centre of incidents.

- The police shall designate a specific area for reporters, to which they may, if they so wish, voluntarily go in the event of incidents, for their protection. In the event of injury, this area will also provide first aid services. Finally, a previously designated officer will act as a liaison and communication channel with them throughout the assembly, in order to facilitate, if requested, the unhindered exercise of their mission and assist them in the event of injury.

**C.** Subsequently, on September 16<sup>th</sup> 2021, Recommendation (EU) 2021/1534 of the European Commission to all Member States on ensuring the protection, safety and empowerment of journalists and other media professionals in the European Union was issued, as part of the European Union’s efforts to strengthen support for media freedom and pluralism.

In this context, a Memorandum of Cooperation was signed on the initiative of the Secretariat General for Media and Communication of the Presidency of the Government and the participation of co-competent Ministries, including the Ministry of Citizen Protection.

In 2022, in the framework of cooperation and actions stemming from the signed Memorandum, the Secretariat General for Media and Communication established the Coordination Task Force, with the subject “Establishment and Constitution of a Coordination Task Force for Ensuring the Protection, Security and Empowerment of journalists and Other Media Professionals”. (Official Government Gazette B’ 3991/28.07.2022).

Within the framework of the said Task Force, its members meet – primarily – once a month, where they discuss various issues related to journalism, while planning actions and interventions to be implemented in the future.

So far, 25 meetings (in person and via videoconference) have been held, including two in the year 2025. The main issues that usually concern the task Force members are:

- recording the exact situation of the country regarding the position of journalists in Greece.
- collecting experiences, requests, and concerns/difficulties that concern the participants in the Group.

- analysis of best practices followed at European Union or International level.

- submission of policy recommendations by each entity.

Some actions that have been implemented within the framework of the Task Force’s operation and are related to the Ministry of Citizen Protection and the Hellenic Police, include:

- Training by UNESCO, from the 18<sup>th</sup> until the 21<sup>st</sup> of June 2024, in Veroia, Imathia, in which police officers and journalists participated jointly. The subject of the training was addressing the challenges and threats faced by journalists during the exercise of their profession. Particular emphasis was also placed on the safe presence of journalists in demonstrations – assemblies.

- Participation in a seminar entitled “The role of the Police in the protection and safety of journalists”. This seminar was held as part of the "Journalists Matter" campaign of the Council of Europe, on September 26<sup>th</sup> and 27<sup>th</sup>, 2024, in Strasbourg, France.

This seminar focused on the activities and role of the police towards the best possible assurance of the safety of journalists and other media professionals. Also, as part of the interaction provided by the seminar, participants exchanged views and experiences on the issue of online threats faced by journalists.

- D. For the Hellenic Police, the protection of the constitutionally guaranteed civil and social rights of citizens, as well as the facilitation of their exercise, within the framework of the current constitutional order, is a fundamental and non-negotiable priority. In this context, its mission lies in ensuring social peace, providing citizens with lawful protection and assisting authorities, maintaining order in public spaces and during public gatherings and assemblies, as well as protecting the individual and collective rights of citizens during these events. (Article 11, Law 4249/2014). In order to achieve the aforementioned, both preventive and repressive actions are developed (Article 93 of Presidential Decree 141/1991). In order to ensure the right to assemble in public in an outdoor space, according to Article 11 of the Constitution and Article 11 of the European Convention on Human Rights (ECHR), in such a way that public safety is not seriously endangered and the socio-economic life of a certain area is not unduly disturbed, the Hellenic state enacted Law 4703/2020 (Official Government Gazette 131/2020). Subsequently, Presidential Decree 73/2020 was issued with the aim of regulating more specific issues, including order, security and traffic measures during the said gatherings, and the further specification of rules and procedures and generally arranging the necessary details, for the purpose of implementing the provisions of Law 4703/2020.
- E. In view of the above, in order to safeguard the right to “assemble”, maintain order, manage traffic and prevent/deter deviant or any other unlawful actions during public, outdoor gatherings, all appropriate actions are taken by the competent police services, in accordance with the provisions of law 4703/2020 and Presidential Decree 73/2020. Furthermore, in every case of unlawful behavior by individuals or groups of individuals who commit what constitutes a criminal offence, the Hellenic Police Services take any police and procedural actions necessary, within the context of their competences. At the same time, they inform the competent official of the relevant Public Prosecutor’s Office, under whose directions and orders they shall act further.
- F. In any case, any exercise of “lawful force” is specifically and concisely defined in Article 2, sub-paragraph ε', of the Police Code of Ethics (Presidential Decree 254/2004 – Α' 238), according to which the police officer: “in order to observe and apply the law, primarily uses non-violent means. Resorting to force is only permitted when absolutely necessary and to the extent provided for and required for the application of the law. The principles of necessity, suitability (appropriateness) and proportionality are always strictly observed. The least forceful means possible are used, so as any unnecessary disturbance, harshness or unjustified damage to property is avoided. The improper use of chemicals and other available means, especially those that may cause harm to the health of citizens, is not made. Firearms shall be used only in the cases provided for by law, and in case they are used, the incident is immediately reported. According to the above-mentioned regulatory framework, the use of force by a police officer against a citizen is only permitted under strict adherence to the principles of necessity, suitability (appropriateness) and proportionality. The violation of these principles, depending on the specific facts of each case, may constitute both criminal and disciplinary offences, which are examined with particular severity and attention. Furthermore, the uniformed personnel of the Hellenic Police have an increased duty of obedience and loyalty. Their official service duty, according to Article 4 of Presidential Decree 120/2008 (Α' 182) “Disciplinary law of police personnel”, extends even outside their assigned duty, imposing the observance of the Constitution, the Laws (in the broadest, substantive sense, meaning every written rule of law, regardless of the source and the legislative body it originates from), the regulations, the orders of the Service, as well as any other proper conduct a police officer must show due to his/her status. Police Officers are in a special voluntary relationship of authority with the State, which allows for this restriction (Council of State provision 2192/2014, 4662/2012 and 1680/2007, 116/2004). Therefore, a zero tolerance policy is followed for any deviant behavior. The result of the aforementioned policy is to investigate all allegations and complaints for reprehensible acts by police officers that come to the knowledge of the Service in any way (reports, complaints, publications, correspondence from prosecutorial authorities etc.) The use of disproportionate or generally

unlawful ‘police violence’ constitutes a breach of the responsible officer’s service duty, and the relevant complaints are thoroughly investigated, depending on their content, both from a criminal and a disciplinary perspective. Finally, in cases where abuse – mistreatment of citizens or brutal behavior is reported, the Greek Ombudsman is notified in order to exercise its duties as the National Mechanism for Investigating Incidents of Arbitrary Behavior, in accordance with the provisions of Article 56-58 of Law 4443/2016, as amended by Article 188 of Law 4662/2020. It should also be noted, that the Greek Ombudsman also handles cases for which the European Court of Human Rights has issued convictions against our country for violating the provisions of the European Convention on Human rights, which identify deficiencies in the disciplinary procedure or new evidence that was not evaluated in the disciplinary investigation or the trial of the case.

#### **QUESTION 15.**

The written input indicates several actions taken in relation to codes of conduct. Do you have any updates on the compliance and enforcement of the following (and can you confirm that all are adopted, published, and ‘in force’): ...d. Guidelines on the Code of Ethics for the Police.

#### **ANSWER:**

See the relevant answer to question 4.

#### **FOLLOW UP QUESTION.** [Police – Financial Police Division]:

Please provide updated figures for 2024 on corruption cases investigated, concluded and sent to prosecution (cf. Table E in Annex I of Greece's written input which shows figures for 2023 and 2022).

Is it higher, lower or the same as the 106 cases reported for 2023? Can you also clarify what 'cases formed' refers to in Table E?

#### **ANSWER:**

During the year **2024**, the Financial Police Division (currently as Economic Crime Prosecution Sub-Directorate- in accordance with the provisions of Decree 29/2024, Government Gazette A'88 of 13.06.2024 - Establishment of the Directorate of Organized Crime), completed a total of **112** corruption cases and **74** case files formed, with a comparatively small increase from the year **2023**.

In addition, for the years **2022** and **2023**, the cases formed and shown in the table (Table E) concern the category of corruption, which includes embezzlement, dishonesty, bribery, breach of duty, false certification, falsification of documents, etc.

It is also specified that the cases listed in Table E as 'cases formed' concern criminal cases brought to justice.