

Ministry of Justice

Pillar I JUSTICE SYSTEM

1. According to the latest Eurobarometer, the level of perceived judicial independence in Greece continues to drop. Several recent polls conducted in Greece also suggest a lack of trust in the justice system. We would like to have your views on this.

The Ministry of Justice diligently considers and studies all available poll ratings, assessments, surveys, and studies related to the justice system and its impact on society. In our view, the image reflected in recent opinion polls is not fully representative, as it has clearly been affected by the recent national tragedy.

Historically, Greeks have consistently placed their trust in justice. A recent OECD survey, published in 2024, on public trust in institutions, showed that the judiciary in Greece ranks third in terms of citizen trust.

Furthermore, our detailed input under Pillar I of the questionnaire clearly shows that addressing long-standing deficiencies in the justice sector and restoring public trust in the judiciary is a top priority.

Substantial legal reforms introduced in 2024 and 2025 aim to address systemic issues in the administration of justice, going beyond delays to include the independence of the judiciary, particularly at the leadership level. Notable examples include:

a. Participation of Judges in Leadership Appointments

A legislative provision for judicial involvement in selecting the judiciary's leadership has been enacted (Article 27 of Law 5123/2024, Government Gazette A' 109). This reform aligns with recommendations from previous Rule of Law reports, promoting transparency and judicial independence.

Under the new system:

The Minister of Justice seeks the opinion of the plenary of the relevant highest court. All members of the Plenary vote by secret ballot for positions such as President, Vice Presidents, Prosecutor General of the Supreme Court, and the General Commissioner of the State at the Court of Audit. Although the opinion is non-binding, the Council of Ministers considers it, following consultation with the Conference of Presidents of Parliament and a proposal from the Minister of Justice. Appointments are formalized via Presidential Decree, based on the recommendation of the Council of Ministers.

This provision, as noted in the 2024 Rule of Law report, is consistent with European standards.

Additionally, a legislative proposal regulating the procedural aspects of implementing this reform is currently under consultation. It originates from the Plenaries of the Supreme Court (Areios Pagos), the Council of State, and the Prosecutor's Office of the Supreme Court. Importantly, this proposal it

extends judicial participation to the appointment of the General Commissioner of the State at the Administrative Courts—further reinforcing judicial independence. **(For more information, please see the answer to the follow-up question no 10)**

The new system will be applied for leadership appointments occurring in June 2025.

Moreover, the government has announced—via a statement by the Prime Minister in Parliament—its commitment to propose a constitutional revision regarding the appointment process of judiciary leadership.

b. Judicial Map Reform

This reform includes the **abolition of Magistrates' Courts** and the unification of the first-instance courts, targeting jurisdictions where significant delays in decisions were observed. The reform is already underway with considerable success, thanks to the cooperation of judges, lawyers, and judicial officers. Supporting data has been submitted in our written contribution.

c. Reform of Proceedings Before the Council of State

Law 5119/2024 amended Presidential Decree 18/1989 ("Codification of provisions of laws on the Council of State"). This reform: strengthens the preliminary examination procedure through strict procedural deadlines, introduces a three-member council for preliminary review, enhances the role of Assistant Judges, -optimizes case distribution, ensures that major cases reach public hearing only when fully prepared.

d. Reform of the Criminal Justice Procedure – Law 5090/2024

This extensive amendment of the Penal Code aims to expedite and enhance the quality of criminal proceedings through measures such as: promoting plea bargaining, transferring cases from multi-member panels to smaller judicial formations, reducing the role of intermediary judicial councils, allowing direct referral of cases to trial, eliminating unnecessary procedural steps, tightening adjournment rules, introducing sanctions for obstruction of justice, including manifestly false or fraudulent lawsuit filings. Further details of the reform are included in our written submission.

e. Digital Transformation in Justice

The digital transformation of the justice system is recognised as a strategic priority and a cornerstone for institutional reform; it is currently being implemented and is expected to be fully completed by 2026.

Most recently, the Ministry of Justice has completed and presented (on April 4, 2025) the project titled: **"Video Conferencing Services in Courts and Penitentiaries and Information Services of Courts' E-Dockets and Exhibits."** This project enables:

- The remote testimony or examination of witnesses in trials, even when located away from the court venue.
- Cross-border remote witness examinations.
- The remote testimony of incarcerated defendants or witnesses.

-Preliminary examinations, pre-trial investigations, and interrogations to be conducted remotely.

-Remote filing and handling of requests for court orders.

-The abolition of transitional seats in administrative first-instance and appellate courts.

Judicial teleconferencing significantly reduces prisoner transfers and witness travel, accelerates investigative processes, and improves service to legal professionals and litigants.

For the implementation of the project: 151 fixed teleconferencing systems were installed in courtrooms nationwide. 250 mobile teleconferencing units were deployed to court offices, Courts of Appeal prosecutor offices (for judicial cooperation), and correctional facilities. Additionally, the “Electronic Court Docket” has been implemented and is fully operational. This information system provides real-time updates on dockets and exhibits and allows both citizens and lawyers to track the progress of cases being heard via the internet.

f. Alternative Dispute Resolution

Another landmark reform, with significant positive effects on both the speed and quality of justice, is already underway: the establishment of the Alternative Dispute Resolution Code. Further information on this initiative is provided below (please refer to question 4).

g. Draft Bill on the Reform of the Code of Civil Procedure

In the near future, the Ministry of Justice will submit a draft bill aiming at the general reform of the Code of Civil Procedure.

The proposed amendments constitute a targeted legislative intervention designed to accelerate the delivery of final and irrevocable judgments, aligning Greece with the average timelines of Council of Europe member states—approximately one year for a final decision and two years for an irrevocable one. These reforms aim to maximize the benefits of implementing the Judicial Map and complement other legislative initiatives by the Ministry of Justice, such as the transfer of judicial tasks to lawyers under Law 5095/2024.

The reforms extend through-out the entire procedural cycle, from the filing of the initial pleading to the issuance of a final and irrevocable judgment. Key innovations include the immediate scheduling of hearing dates upon filing, strict procedural deadlines, and enhanced use of the pre-trial phase. Notably, a new preliminary judicial review (Article 237 CCP) enables the judge to reject inadmissible, ambiguous, or manifestly unfounded claims, allowing for prompt rectification by the parties.

Regarding the issuance of final decisions, the new Code introduces specific timeframes for each procedure: six months for ordinary proceedings, four months for non-contentious/non-adversarial proceedings jurisdiction cases, and one month for interim measures.

Cassation proceedings are similarly streamlined through direct filing with the Supreme Court, page limits for pleadings and the reintroduction of written judicial reports prior to hearings to expedite deliberations.

2. Are there any plans to include in the forthcoming constitutional revision the provisions on the appointments of the Presidents and Vice-President of the highest courts?

Aiming to strengthen the rule of law and citizens' trust in the institutions, the Government, according to a statement by the Prime Minister before the Parliament, has committed to propose the revision of the constitutional provisions concerning the selection of the leadership of the Judiciary (article 90).

The Prime Minister also pledged to propose a revision of Article 86 of the Constitution on the criminal proceedings for ministers.

At the same time, he also referred to the need to constitutionally enshrine evaluation in the public sector.

All of the above undoubtedly constitute fundamental aspects of the rule of law.

It should be recalled, however, that according to Article 110 of the Constitution, the Parliament is the sole body competent to propose the provisions to be revised, as well as their content. The Constitution establishes a two-stage revision process (proposing - revising Parliament), with parliamentary elections serving as the intervening phase.

3. [in writing] Regarding access to case-law, could you please confirm our understanding and/or provide the missing information:

- Council of State: 1929-1990: all judgments are available online (without anonymisation); 1990-2016: what is the state of play; 2016-2022: 99% of judgments available (anonymised); 2022-onwards: state of play?
- Supreme Court: from mid- 2006 onwards: are all decisions available? 1997-2006: what are the criteria for publication? Is a rough estimation of percentage of published judgments available?
- Court of Audit: main webpage: selection of cases by topic covering 2015-onwards; database: all decisions from 2001-2024.
- What is the situation with lower courts?

I. Council of State:

1929-1990: all judgments are available (without anonymisation);

1990-2008: all judgments are available (anonymised)

2009-2015: the anonymisation is ongoing: As of April 30, 2025, the anonymization status is as follows:

- 2009: anonymised decisions 3482 out of 4614,
- 2010: anonymised decisions 3019 out of 4469,
- 2011: anonymised decisions 4673 out of 1092,
- 2012: anonymised decisions 2094 out of 5521,
- 2013: anonymised decisions 855 out of 5019,

-2014: anonymised decisions 1507 out of 4997,
-2015: anonymised decisions 872 out of 4691,
2016-2023: 99% of judgments available (anonymised);
2023-2025: the anonymisation is ongoing, as follows (April 30th, 2025):
2023: anonymised decisions 1943 out of 2490
2024: anonymised decisions 1844 out of 2303
2025: anonymized decisions 13 out of 263

II. Supreme Court of Areios Pagos – lower courts

The Court of Cassation (Areios Pagos), the oldest supreme court in the country (founded in 1834), has decisions dating back to 1835 in printed form.

There is a total of 144,644 Civil court decisions from 1835 until April 2025, of which 35,857 have been anonymized since 2006. This represents an overall anonymization rate of 24.8%.

If we look at the period from 2000 onwards, there are 46,404 Civil court decisions, of which 35,857 are anonymized, corresponding to a rate of 77%.

For the Criminal Division, there are 29,145 anonymized decisions from 2006 onwards.

For decisions dated prior to 2000, they are forwarded on demand to the legal databases, which are obliged to anonymize or summarize them, in compliance with the applicable data protection regulations.

Regarding the situation with the lower courts:

Through the Digital Portal of Civil and Criminal Justice (<https://www.solon.gov.gr/webcenter/portal/osddy/home>), which started to develop in 2018, citizens and lawyers can be informed about the progress of their case, the dockets for the next 15 days, the courts and procedures that have been included in the system, as well as the political flow. Specific Courts of First Instance and Appeals are already integrated into the integrated information system for civil and criminal case management (OSDYPP). The work of integrating all Courts of First Instance and Appeals into OSDYPP is ongoing.

Furthermore, decisions of lower courts are forwarded on demand to the legal databases, which are obliged to anonymize or summarize them, in compliance with the applicable data protection regulations. –

III. Court of Audit: main webpage: selection of cases by topic covering 2015-onwards; database: all decisions from 2001-2024.

4. Regarding the use of Alternative Dispute Resolution:

(a) Assessment of the use of the existing methods: do you have information about the use and possible impact of existing ADR?

The institution of mediation is considered successful, despite certain operational challenges.

The number of applications for voluntary mediation is steadily increasing each year (from 2,863 applications in 2020 to 10,165 in 2023, reflecting a 255% increase), with the vast majority of mediators being selected by the parties themselves rather than by the Central Arbitration Committee (CAC).

Most cases concern socially sensitive disputes, particularly family and banking disputes.

A significant percentage of mediations conducted over the four-year period since the institution's operation have concluded with an agreement, predominantly in family and banking cases.

Specifically, during the two-year period 2022–2023, 88.43% of family cases submitted to mediation (619 out of 700) resulted in a full agreement, while an additional 2.71% (19 cases) reached a partial agreement.

In terms of appointments made by the parties, the majority involved family disputes (36.24%), followed by commercial disputes (13.6%). Regarding appointments by the CAC, most cases involved banking disputes (26.64%), followed by commercial disputes (19.04%).

In banking disputes, the number of Mandatory Initial Session (MIS) cases involving appointments by the parties nearly doubled in 2023 compared to 2022.

An interesting development concerns the rate of cases that proceeded to mediation following an MIS in 2023 and their distribution across case categories.

Out of a total of 1,126 MIS cases, 11.08% continued with mediation, and 7.73% (786 cases) resulted in an agreement.

In 2022, the agreement rate stood at 6%.

It is important to note that the agreement rates are calculated based on the total number of cases reported in the mediators' Activity Reports. Furthermore, when examining only the cases that proceed to full mediation, the success rates exceed 60–70%.

At this point, it should be emphasized that the mediation framework established by Law 4640/2019 applies to disputes regardless of whether litigation has already commenced, as parties are allowed to engage in mediation after the dispute arises, without the requirement of pending judicial proceedings.

Statistics obtained from the Athens Court of First Instance — where mediation records are filed according to material and territorial jurisdiction — demonstrate a dramatic rise in successful mediations, indicating that the institution is increasingly being consolidated.

Specifically, there were 110 successful mediations recorded in 2020, rising to 335 in 2021, 604 in 2022, and 753 in 2023. For 2024, the number increased significantly to 1,207, while for 2025, as of 14 March, 286 successful mediations had already been recorded.

In conclusion, it can be observed that when parties opt to proceed with mediation after the Mandatory Initial Session (MIS), the majority — particularly in family disputes — successfully reach a mutually beneficial agreement.

(b) Are there any plans to enhance the current system or introduce new procedures?

Following a decision by the Prime Minister and the Minister of Justice (Decision 798, Government Gazette B 741/20.02.2025), a Special Secretariat for Alternative Dispute Resolution has been established within the Ministry of Justice. Its mission is to reform the legislative framework for out-of-court dispute resolution, promote and support these institutions, and facilitate their long-term development.

The Secretariat will consist of two Units, operating and reporting directly to the Special Secretary:

-Unit for the Organisation of Mediation and Other Methods of Alternative Dispute Resolution

-Unit for Outreach and International Practices.

The flagship project of the Special Secretariat will be the drafting of a Code of Alternative Dispute Resolution, structured into three sections: Mediation, Judicial Mediation, and Arbitration.

The Working Group for drafting the Code was established by Decision No.9026/F.381/27.02.2025 and is expected to commence its work immediately.

(c) The use of ADR for tax disputes has a temporary nature. Are there any plans to further extend it? Do you have information on its use and impact, in particular on businesses?

(1) Dispute Resolution Directorate (DRD) of the Independent Public Revenue Authority (AADE):

Administrative appeals before the Dispute Resolution Directorate (DRD) of the Independent Public Revenue Authority (AADE) are submitted for the review of acts of the tax administration in the framework of administrative proceedings. The aim is to resolve tax disputes within short deadlines, facilitating the swift collection of public revenues and alleviating the administrative courts from cases that can be settled at the level of the tax administration.

A liable party contesting acts, either express or implied, issued or performed from 1 January 2014 onwards by the Tax Authority and falling within the scope of the Code of Tax Procedure (CTP), must, prior to resorting to administrative justice, lodge an administrative appeal before the DRD, requesting a review of the contested act within the administrative process.

The appeal must be lodged with the competent tax authority that issued the challenged act. It should be noted that no fee is required for the submission of an administrative appeal before the DRD.

Furthermore, as of 29 November 2022, it is possible to digitally submit an administrative appeal and a request for suspension before the DRD, as well as to monitor the progress of the proceedings, for acts issued by the tax authorities.

Statistical Data

Statistical data regarding the total number of administrative appeals submitted before the DRD, as well as the number of appeals partially or fully accepted or rejected, are published on the website of the Independent Public Revenue Authority (AADE) at the following link: <https://www.aade.gr/open-data-kpis>. It should be noted that, within the statistical report for each month, there is a separate section dedicated to the DRD. Additionally, in the statistical report of the last month of each year, the data from all four quarters of the year are aggregated and presented in the final columns.

Moreover, annual cumulative statistical data are published in the Authority's annual report at the following link: <https://www.aade.gr/apologistikes-ektheseis>. The following statistical data are drawn from the most recent Annual Report of the Authority for the year 2024 ("Independent Authority for Public Revenue (AADE) 2024 Annual Activity Report and 2025 Activity Planning):

i. Rate of Examination of Administrative Appeals

In 2024, 98.1% of the administrative appeals were examined before the statutory deadline, compared to an annual target of 87%, thus exceeding the target by 12.7% and improving the corresponding rate of 2023 by 2.4 %

ii. Categories of Express Decisions

In 2024, a total of 6,281 decisions were issued, achieving 102% of the set target. Of these decisions, 3,253 (51.8%) concerned administrative tax assessments and 3,028 (48.2%) concerned corrective tax assessments (from tax audit cases), as shown in Diagram 2.23.

Specifically, of the express decisions concerning corrective tax assessments, 69.7% were dismissive while 30.3% were positive. Similarly, of the express decisions concerning administrative tax assessments, 67.0% were dismissive while 33.0% were positive.

iii. DRD Decisions Challenged before the Administrative Courts

At the end of 2024, the percentage of the Dispute Resolution Directorate's decisions that were challenged before the Administrative Courts decreased to 40.5%, compared to 41.0% on 31/12/2023, thus surpassing the annual target of ≤50%.

(2) In relation to the Committee established under Article 16 of Law 4714/2020, it is provided, pursuant to Article 32 of Law 5188/2024, that the examination of applications for out-of-court settlement must be concluded by **31 July 2025**, and the relevant settlement protocols must be issued by **30 September 2025**, upon which date the term of office of the General Head, the members of the Committee's Sections, and the Secretaries shall also expire. Applications not examined by 31 July 2025 shall be deemed to have been implicitly rejected.

Accordingly, applications submitted in accordance with Article 16 of Law 4714/2020, as successively amended by Article 60 of Law 4949/2022 and Article 48 of Law 5073/2023, and filed by 30 June 2024, must be processed by 31 July 2025, and the corresponding protocols must be issued by 30 September 2025. The submission of new applications has been suspended as of 30 June 2024.

It should be noted that any extension of the Committee's operation requires new legislative intervention, both to reopen the possibility of submitting new applications and to extend the deadlines for the examination and issuance of settlement protocols for the applications already filed.

(3) Recourse to arbitration proceedings

i) In the context of the implementation of the Double Taxation Conventions, there is the possibility of initiating the Mutual Settlement Procedure (MSP), which is a mechanism for resolving international tax disputes concerning double taxation cases as well as inconsistencies in the interpretation and application of these bilateral Conventions. It is a procedure of public international law, which is independent of the remedies provided for under the national law of States. The issues relating to this procedure are regulated by Decision No. A. 1226/2020 of the Governor of the AADE.

ii) Directive (EU) 2017/1852, which was transposed into domestic law by the provisions of Law 4714/2020, establishes rules for the mechanism for the resolution of disputes between Greece and one or more of the other Member States of the European Union, which arise from the interpretation and application of agreements and conventions, which provide for the elimination of double taxation of income and, where applicable, capital.

iii) in the framework of the implementation of the Arbitration Convention 90/436/EEC (ratified by Law 2216/1994) between the EU Member States for the elimination of double taxation arising from the adjustment of profits of associated enterprises, a specific procedure is provided for the referral of cases concerning intra-group transactions within the EU to an Advisory Commission/Arbitration Panel.

5. Without referring to the numerous and diverse ongoing projects to improve digitalisation, what tools do judges and the parties have actually at their disposal? ^{1 2}

As we have already detailed in our written contribution, the digital transformation of the Justice system in our country is currently underway and is expected to be completed by 2026. The completion of digital projects represents a real opportunity for the improvement of the quality of Justice, as it will address serious structural deficiencies and long-standing issues. The recent legislative initiatives, along with the implementation of the Judicial Map, require the digital transformation of the system, which will substantially modernize and upgrade its operation and the way Justice is administered.

Projects that have already been completed and are operational include:

-The community service digital platform,

¹ Links:

<https://portal.e-diki.justice.gov.gr>

<https://applications.e-diki.justice.gov.gr/select-user-type>

<https://pinakio.e-diki.justice.gov.gr>

https://extapps.solon.gov.gr/mojwp/faces/TrackLdoPublic;jsessionid=uSal3V8MsamU6WkvWXir2_933E24r9nVr6LZOg4oW14cdjPNkKfN!-1184164190

<https://pinakio.e-diki.justice.gov.gr/guest/home>

² Indicative legislation. Code of Criminal Procedure (Art. 238A), Joint Ministerial Decision (No. 262, Page No. 1084, Government Gazette B. Law. 5028/2023 (Chapter B).

- The digital platform for the service of criminal orders, decisions issued in the absence of the accused, and witness summons to the citizen's electronic mailbox,
- The electronic court docket,
- Teleconferencing services in courts and penitentiaries through remote connections.

Additionally, approximately one-third of the judicial archives have already been digitized.

The upgrade and expansion of the Integrated Judicial Case Management Information Systems (OSDDYD for Administrative Justice and OSDDYPP for Civil and Criminal Justice) is also progressing across all courts in the country.

Particular emphasis is placed on the **Electronic Case File**, a sub-project of OSDDYPP, which constitutes an institutional innovation that will fundamentally change the way Justice is administered in Greece.

More specifically:

A. Digital tools already available to citizens and lawyers:

As already mentioned, in administrative and criminal proceedings (with relevant provisions in the respective codes of procedure and secondary legislation), there is the possibility of remote examination of parties, witnesses and defendants as well as the ability to monitor court dockets (electronic docket) across all jurisdictions.

In addition, e-filing has been extended and is functioning properly in civil (for most types of documents) and administrative courts.

Specifically regarding e-filing in administrative proceedings: Electronic filing has been operational since 29 May 2018, allowing the electronic submission of initial pleadings in all administrative courts nationwide. By 31 December 2024, a total of 47,710 pleadings — primarily opening pleadings — had been filed electronically. The system was further expanded in 2023 to include ancillary pleadings, such as interventions and additional pleadings, and to facilitate the legal capacity of lawyers filing on behalf of clients.

The monitoring of the progress of civil cases by all citizens through the solon.gov.gr platform, which is being gradually expanded, is another important development.

Lawyers can additionally monitor lawsuits through the portal of the Plenary of the Bar Associations, which is interconnected with the Integrated Judicial Case Management System for Civil and Criminal Justice (OSDDYPP).

Of equal importance is the ability to electronically download copies of judgments and transcripts.

As regards the platform for serving summonses to the citizen's electronic mailbox — established by Law 4937/2022 and the corresponding Joint Ministerial Decision — it has commenced operations in major courts such as the Athens Prosecutor's Office of First Instance, covering a significant percentage of witness summonses. This service is progressively expanding nationwide, aiming in the

coming years to become the main method for the swift and reliable delivery of summonses, indictments, and court decisions.

It is also worth noting that Article 63 of Law 5172/2025 amended Article 4 of Law 4963/2022 to allow the staff of the newly established Judicial Police to carry out electronic service.

Most recently, the Joint Ministerial Decision No. 262/2025 (Government Gazette B' 1084/10-3-2025) was issued regarding the conduct of videoconferencing in criminal proceedings pursuant to paragraph 4 of Article 238A of the Code of Criminal Procedure. This covers the entire criminal procedure — including the pre-trial phase, investigation, and trial — by allowing the remote examination of defendants, witnesses, and other participants.

The first videoconference already conducted in the context of a criminal trial at the Athens Court of First Instance marks a significant milestone toward enhanced service, increased security with safeguards, and the saving of considerable financial and human resources by minimizing unnecessary transfers and movements.

We would also like to reiterate that on 10 December 2024, the first remote hearing in administrative justice was successfully conducted between the courtroom of the Administrative Court of First Instance of Patras and the remote location — the Court of First Instance on the island of Kefalonia.

Furthermore, the pilot implementation of the electronic service of summonses and decisions to the Legal Counsel of the State is expected to commence shortly, following the issuance of a Joint Ministerial Decision pursuant to Articles 29 and 30 of Law 4990/2022 (A' 210), at least for substantive disputes.

B. Digital tools already available to judges:

The Council of State and the administrative justice, in general, have access through the Integrated Judicial Case Management System for Administrative Justice (OSDDYDD) to:

(a) A case-law database of the Council of State and administrative courts, offering robust search capabilities with multiple search modes (free text, numerical index, subject index)

(b) The ability to electronically circulate documents (pleadings and registry acts).

(c) Immediate access to case-law updates (through the Council of State's bulletins and the bimonthly bulletin of the General Commission of the State for regular administrative courts) via the website and the OSDDYDD database.

Similar functionalities for case law research are available to civil and criminal courts and the Court of Audit.

Furthermore, judges and other individuals with a legitimate interest may access the minutes of court proceedings from civil and criminal courts nationwide.

6. [In writing] Does the Office for Judicial Statistics have the necessary personnel to be able to function? Could you please provide copies of the latest annual work programme and annual evaluation report (Article 4 PD 47/2022)?

In the context of improving the collection, processing and dissemination of judicial statistics, the Ministry of Justice has already strengthened the Office for the Collection and Processing of Judicial Statistics (JustStat) with appropriate personnel. Specifically, at this stage, the Office is staffed by two data analysts, permanent staff members of the Ministry of Justice, as well as two additional specialists — a statistical analyst and a computer scientist — employed under fixed-term contracts.

Furthermore, the Ministry aims to further reinforce the staffing and operation of the Office. To this end, an open international online tender was launched for the selection of a company that will provide support to the JustStat Bureau, including, among other services, a helpdesk function staffed by 11 qualified personnel.

The latest Annual Report of the Office (for 2024) is currently undergoing preparation and review. Its publication is anticipated within the month of June 2025, at which time an official copy will be duly forwarded to you, as requested.

7. Do you have information on the efficiency of the Special commercial chambers? Has their establishment had an impact on reducing the time for adjudicating commercial disputes?

In Greece, **Special Commercial Law Chambers** have been established within the judicial system to adjudicate commercial disputes efficiently. Apart from general commercial law chambers, **specialized divisions** have been set up, such as:

The **F Chamber** (Single-Member and Multi-Member Divisions) of the **Athens Court of First Instance**.

The **Maritime Chamber** at the **Piraeus Court of First Instance**.

Specialized Commercial Law Divisions also exist at the **second instance** level, particularly within the major **Courts of Appeal** (Athens and Piraeus).

Thanks to the **specialization of judges** and the **dedicated dockets**, these chambers have proven highly effective, resulting in **faster adjudication times** compared to the general average. Notably, the **Piraeus Maritime Chamber** alone adjudicates more than **500 cases annually** (based on official data from the court's information system).

Specifically, with regard to the Special Commercial Law Chamber of the Athens Court of First Instance (Dockets FA1 and F1), the following information can be provided:

- **Functional jurisdiction:** This Chamber hears, exclusively, cases of intellectual property, national trademarks, European Union trademarks, patents, utility model certificates, technology transfer, semiconductor product topographies and supplementary protection, industrial designs and models and, in general, all intellectual property cases falling under the jurisdiction of the civil courts (Article 2 of the Internal Regulation of the Athens Court of First Instance, Government Gazette, B

693/21.5.2010, in conjunction, as regards trademarks, with Articles 6 and 10(1) of Law 2943/2001, 123 and 124 of Regulation (EU) 2017/1001 of the European Parliament and of the Council of 14 June 2017 on the European Union trade mark', and, as regards intellectual property, with Article 3 (26) of Law 2479/1997).

- **Material jurisdiction:** In principle, the Single Judge of the Court of First Instance has jurisdiction over claims for infringement of a trade mark (national and EU trade mark), irrespective of the amount. However, where other claims are cumulated in the action (e.g. non-monetary claims for unfair competition or for infringement of distinctive signs), the multi member Court of First Instance will have jurisdiction (Article 150 (1), (9) and 10 of Law 4072/2012 and already Article 38(1)(9) and (10), of Law 4679/2020, in conjunction with Art.7 (2) of Law 2943/2001). For other claims, the general provisions of the Code of Civil Procedure apply.

- **Local jurisdiction:** In relation to EU trade mark cases. local jurisdiction extends to: a) the Special Trade Mark Chamber of the Athens Court of First Instance and the Athens Court of Appeal in the districts of the Courts of Appeal of Athens, Aegean, Dodecanese, Corfu, Crete, Lamia, Nafplio, Patras and Piraeus and b) the Special Trade Mark Chamber of the Thessaloniki Court of First Instance and Court of Appeal in the districts of Thessaloniki, Western Macedonia, Thrace, Ioannina and Larissa (Article 7(1) of Law 2943/2001). For other cases the general provisions of the Code of Civil Procedure apply.

- **International Jurisdiction:** In cases that have an element of foreign activity, if it is an infringement of an EU trade mark, Article 125 of Regulation (EU) 2017/1001 of the European Parliament and of the Council of 14 June 2017 "on the European Union trade mark" is applicable, while if it concerns other claims (other than trade marks), Regulation (EU) 1215/2012 of the European Parliament and of the Council of 12 December 2012 "on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters," Brussels I, Recast)

8. Given the high number of complaints regarding excessive delays in the issuance of electronic court certificates and attestations, often substantially exceeding the time span necessary prior to the digitization of the procedures in question, do you have information on the causes of this situation, and do you intend to remedy to it? In writing

Law 5108/24, pertaining to the consolidation of the jurisdiction of first-instance courts, has resulted in a significant increase in the volume of daily cases per hearing, thereby optimizing the allocation of judicial and human resources. However, this reform has concurrently altered the delivery schedules of electronic applications due to the heightened demand for software adaptations. Consequently, delays have emerged within the OSSDYPP project, specifically with regard to the implementation of the applications related to the issuance of certain certificates.

In addition to the considerable volume of certificate requests, a substantial portion of the delay can be attributed to the existence of two distinct IT systems for the issuance of certificates, and the ongoing migration of data between these systems. One of these systems, employed by the Court of First Instance, was used for the issuance of certificates such as those pertaining to wills. However, the issuance of these certificates also required their entry into the corresponding information system of the Court of First Instance. Due to workload constraints, the input of certificates into the Court's information system was delayed, resulting in the information being outdated.

Prior to the implementation of the new Judicial Charter, no delay occurred, as the two information systems were not interconnected until the new Charter is fully enacted in September 2025. During

this period, certificates were able to be issued by the respective Magistrates' Courts. However, the responsibility for issuing such certificates now lies with the Athens Court of First Instance. Thus, in cases where a citizen requests a certificate of non-publication of a will from the Athens Court of First Instance, and the certificate has not yet been integrated into the Court's information system, the Court of Justice in which the will was filed is unable to issue the certificate until the data is registered in the Court's system. This has led to a backlog of certificates, as this remains a transitional period.

In response to the challenges posed by this transitional phase, the General Secretary of Justice at the Ministry of Justice, together with the General Secretary of Fiscal Policy at the Ministry of Finance, issued Decision No. 77 on 17 April 2025 (Government Gazette, No. 1990/24 April 2025), addressing the 50,000 pending digital certificates of wills and waivers of succession at the Athens Court of First Instance. The Decision provides for the establishment of a Task Force, comprising up to 333 judicial clerks, for a period of two months, with additional compensation of 450 Euros, to address the temporary backlog in the issuance of these certificates.

9. Following the implementation of the revision of the administrative judicial map, do you have information on its positive impact to date, in terms of hearing dates appointments, clearance rate, disposition time?

Based on the roadmap and the timetable of Law 5028/2023, the following actions have been implemented:

Transfer of competences (regarding subject matter and local jurisdiction) and decentralisation of cases;

Reallocation of posts of judicial officers;

Implementation of information and communication technologies and introduction of telematic/videoconference hearings at transitional court seats.

These measures have significantly rationalised the system, leading to improvements in key efficiency indicators, including the number of court hearings, the volume of pending cases, the clearance rate, and the estimated case disposition time (in days), compared to the 2020–2022 period.

Indeed, the total number of pending cases (for administrative courts of first instance and courts of appeal) has been steadily decreasing since 2020:

As of 31 December 2020, there were 143,687 pending cases;

By 31 December 2024, this number had dropped to 101,907 cases, representing a reduction of 29.1 percentage points.

Moreover, a further decrease of 5.1% was recorded in 2024 compared to 2023 (where 107,352 pending cases were registered), highlighting the improved efficiency of the administrative judicial map.

In addition, the clearance rate for 2024 was calculated at 107.98%, meaning that an additional 7.98% of the previous year's backlog was processed and cleared.

Furthermore, in 2024, the estimated time for completion of proceedings continued to improve compared to the 2020–2022 period, standing at 504.89 days, compared to 509.51 days in 2022 and 670.16 days in 2021.

Follow-up question 1:

Please provide updates on the legislative proposal to further amend the appointment procedure of the Presidents and Vice-Presidents of the highest courts. Please also provide information once the new procedure is applied for the first time.

The proposed regulation, introduced following proposals from the Administrative Plenaries of the Supreme Courts and the Prosecutor's Office of the Supreme Court [see Decision 47/2024 of the Council of State, Decision 53/2024 of the Supreme Court, and Decision-Minutes 2/2025 of the Prosecutor's Office of the Supreme Court], aims to improve the provisions of Article 27 of Law 5123/2024 (A'109) and address procedural issues in light of its first application.

Key Provisions:

a) Clarification of Selection Criteria:

For the President: candidates must be among the Vice Presidents or the ten most senior members of the Plenary of the Supreme Court who are not set to retire in the promotion year. For each retiring Vice President at the Council of State and the Court of Audit, the next most senior eligible member is added as a candidate. At the Supreme Court, four such members are added per retiring Vice President.

For Vice Presidents: candidates are selected from the ten most senior members not retiring that year. Four additional candidates are added for each vacant Vice President position.

b) Voting Rules:

The multiple voting system established in Law 5123/2024 is retained to promote internal harmony and collegiality among judges.

Secret ballot voting with a minimum number of votes is mandatory (3-5 candidates for President, Prosecutor of the Supreme Court, General Commissioner at the Court of Audit, while for Vice Presidents: 3 candidates up to 50% of eligible candidates, with a cap of 10)

These limits aim to ensure a clear and representative opinion, avoiding both over-concentration and excessive dispersion of votes.

c) Procedural Safeguards:

Voting remains secret. The process—candidate notification, voting, and vote counting—is overseen by the President of the respective Supreme Court, or the Prosecutor in the case of the Prosecutor's Office. The vote on the Prosecutor of the Supreme Court takes place concurrently in both Plenary bodies.

d) New Provision for the General Commissioner of the Administrative Courts:

A new voting process is introduced for the selection of the General Commissioner of the State at the Administrative Courts. Before the Conference of Presidents of Parliament issues its opinion, the Minister of Justice must seek the opinion of a body composed of all General Commission members and the 50 most senior Presidents of Administrative Courts of Appeal. The opinion is given via secret ballot, conducted simultaneously in Athens and Thessaloniki after a formal invitation by the General Commissioner or their legal deputy. Each voter must choose 3 to 5 qualified candidates under penalty of vote nullification.

Conclusion:

These changes strengthen and refine the initial framework introduced by Article 27 of Law 5123/2024. They ensure clear, independent, and institutionally sound input from the judiciary in leadership selections, aligning with Rule of Law principles and preserving collegiality among judges.

The proposed reform will be submitted to the Parliament for vote shortly and the new system will be implemented for leadership appointments occurring in June 2025.

Pillar II ANTICORRUPTION FRAMEWORK

1. Could you please elaborate on how the statistics you provided (Annex I of the written input) in your view fulfil the 2024 recommendation to improve Greece's track record of prosecutions and final judgments, including high level corruption cases? Are there any obstacles preventing progress and if so, what are they and how will they be resolved?

Follow-up question 2:

On track record corruption - please send us

(i) the references and explanations to the penal and civil protection code referred to in your oral replies and how this helps fight corruption. Please refer only to new amendments since July 2024 and not those that we already reported on in the 2024 Rule of Law report;

(ii) the more detailed statistical data with more qualitative explanations that you indicated you will send;

(iii) could you clarify the definition and scope and meaning of 'breach of trust' as a corruption offence (48 cases were handled by the Economic Crime Prosecutors' Office in 2024 and 110 in 2023);

(iv) between now and June 2025, if there are any developments concerning investigations, prosecutions and adjudications of corruption offences, including high-level, please keep us informed in case of updates to the statistics provided in Annex I of your written input from January 2025.

Firstly, we would like to note that Greece, in line with the relevant recommendation "to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption" is moving forward with the development of a **single corruption case management register**. This register is intended to serve as a central tool for the effective recording and monitoring of corruption-related cases, starting even before the initiation of criminal proceedings and continuing through to the final and irrevocable adjudication of each case. The register aims to enhance transparency and enable systematic tracking of case progress across all stages of the judicial process. For further details regarding the technical and procedural design of the register, please refer to the answer under question no 3.

(i) Furthermore, we would like to highlight Greece's ongoing efforts to strengthen anti-corruption measures. We continue to take consistent steps, both legislative and non-legislative, to combat corruption effectively. Our legal framework was significantly reinforced in 2024 through the adoption of Laws 5090/2024 and 5095/2024. Beyond legislative changes, we remain committed to addressing practical challenges and improving procedural efficiency. Indicatively, the following actions are highlighted:

-Article 21 of Law 5095/2024 amended Article 35 of the Code of Criminal Procedure, granting the Financial Prosecutor jurisdiction to initiate criminal proceedings directly after the conclusion of the preliminary investigation. This reform aligns with the OECD's Recommendation (4th Evaluation Cycle, 2022), which emphasizes the need for immediate prosecutorial action in corruption cases without unnecessary procedural delays or referrals to local district prosecutors.

-A Memorandum of Cooperation was signed in 2024 between the Ministry of Justice and the Ministry of Digital Governance for the development of specialized software to assist in the translation of documents related to criminal proceedings.

-Joint Ministerial Decision No. 262 (Government Gazette B' 1084/10.3.2025) introduced provisions for conducting videoconference hearings, covering the entire criminal procedure, pre-trial, interrogation and especially the trial with the remote examination of all participants of the process, such as defendants, witnesses, parties(please see above , Pillar 1 question no 1 and 5).

-**Article 60 of Law 5108/2024** expanded the powers of the National Correspondent to EUROJUST to include the receipt and transmission of all forms of communication data obtained from other EU Member States or through Joint Investigation Teams (JITs). This amendment established a comprehensive legal framework for incorporating material gathered by JITs, including evidence relevant to high-level corruption cases.

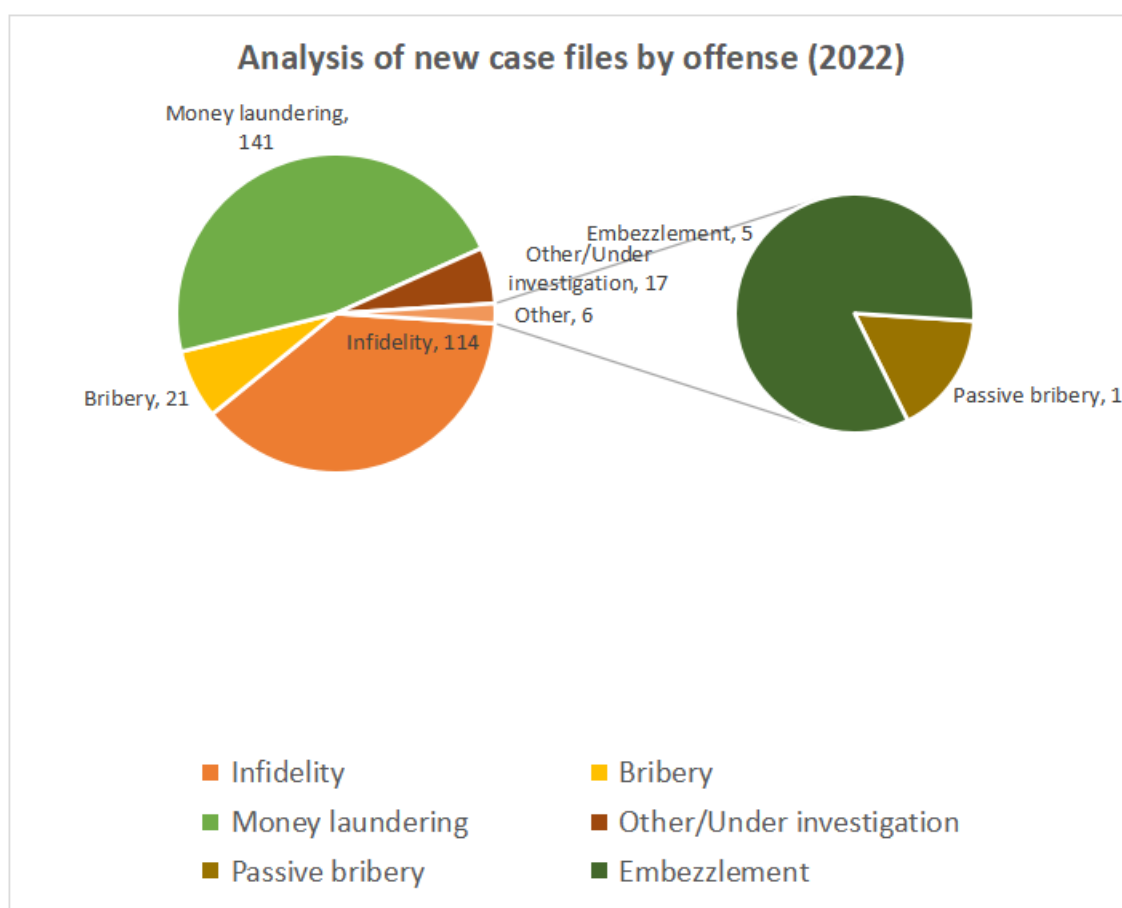
-Additionally, with the recent **amendment of Article 231 of the Penal Code under Law 5172/2025 (A'10)**, a critical gap in the deterrence and proportionality of criminal provisions has been addressed. A new, distinct criminal offense—obstruction of justice—has been introduced, carrying severe penalties that typically result in custodial sentences. This offense includes any act that impedes a judicial investigation or pending trial, especially in relation to corruption cases. It encompasses acts of coercing another person—including through the abuse of an employment relationship—to provide false testimony, conceal, destroy, alter, remove, or tamper with evidence, or otherwise obstruct access to it. This legislative reform significantly strengthens judicial integrity and ensures that corruption-related proceedings are safeguarded against interference, manipulation, or intimidation. It encompasses coercing another person (including through abuse of an employment relationship) to provide false testimony, conceal, destroy, alter, remove, or replace evidence or prevent access to it. This reform enhances the protection of judicial integrity and ensures that corruption cases are not undermined through interference or intimidation.

Moreover, **Article 205 of the new Law 5187/2025** (Government Gazette A 48) introduces an amendment to Article 187C of the Criminal Code (Favourable Measures). The amendment provides that if the perpetrator of a misdemeanour or felony punishable by temporary imprisonment—excluding those offenses stipulated in Chapter 19 of the Special Part of the Criminal Code—substantially contributes, on his or her own initiative and prior to irrevocable conviction, by providing information leading to: the dismantling of a criminal or terrorist organization, the full resolution of a felony under Articles 187 and 187A of the Criminal Code, the full resolution of any related felony or the identification and arrest of the perpetrator of such crimes, then the court shall impose a reduced sentence pursuant to Article 83 of the Criminal Code, provided that the gravity of the offender's act and degree of culpability are manifestly inferior to those of the individuals implicated by the information provided. This new provision will operate in parallel with the already existing provision of Article 263A of the Criminal Code, thereby enhancing efforts to uncover major corruption offenses, including those involving high-ranking state officials.

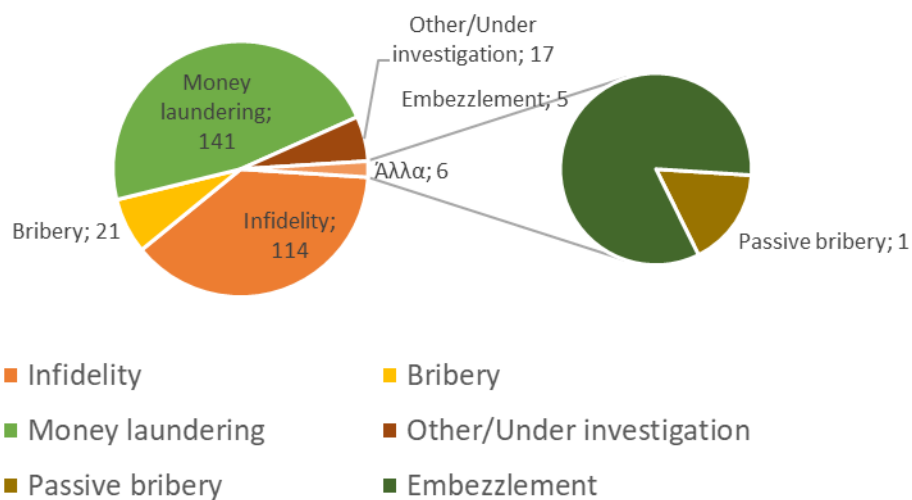
(ii) Statistical data:

● **The Economic Crime Prosecutor** keeps statistical data on the cases he handles based on the behaviors under investigation, which vary by case file and may reflect more offenses. For this reason, in the following drawings, which have been extracted from the computerization system of the Economic Crime Prosecutor, the figures mentioned do not correspond to case files but to individual offences, which in many cases are investigated within the framework of the same case file:

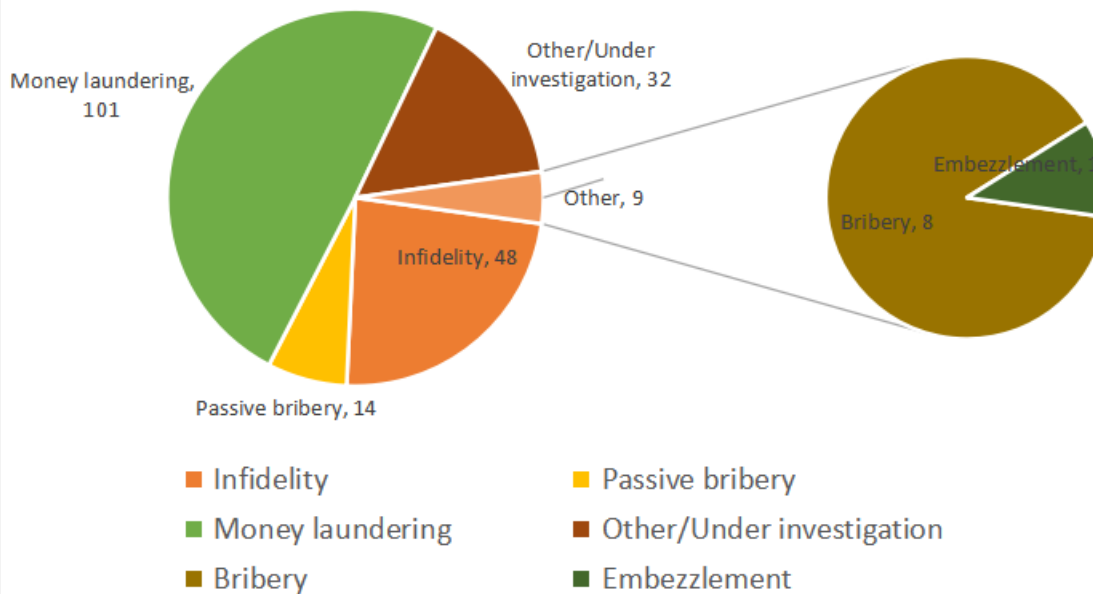
This computerization system, which has been informally drawn up by the secretariat of the Office of the Economic Crime Prosecutor for the purpose of better organization and management of the case files handled by the Economic Crime Prosecutors, is not interconnected with the computerization system of the Ministry of Justice and therefore the statistical data extracted from the latter system should not be mistaken for the above statistical data kept by the Office of the Economic Crime Prosecutor. In cases referred to in the relevant tables exported from the system of the Ministry of Justice, further information and explanations can be provided either by the competent service of the Ministry or by the local prosecutor's authorities.



Analysis of new case files by offense (2022)



Analysis of new case files by offense (2024)



● With regard to the **Ministry of Justice's information system (JustStat)**, data are recorded across two distinct databases:

a) the first aggregates the number of criminal prosecutions initiated per prosecutorial authority and monitors their progression;

b) the second aggregates the number and types of court decisions issued in relation to prosecuted cases, without, however, allowing for the linkage of specific prosecutions to corresponding court rulings.

This structure is attributable to the fact that the design of the JustStat system has thus far been oriented towards fulfilling the annual statistical reporting requirements of the OECD through the provision of aggregated data.

Nevertheless, as previously noted, in light of the increasing demand for comprehensive statistical data on corruption-related offences, an inter-ministerial committee has been established to oversee the development of a Digital Register dedicated to tracking corruption cases. The purpose of this Register is, inter alia, to ensure the systematic recording of the lifecycle of a corruption case — from its initial reporting to the stage of prosecution and, where applicable, final adjudication.

iii) Definition and scope and meaning of **'breach of trust'** as a corruption offence (48 cases were handled by the Economic Crime Prosecutors' Office in 2024 and 110 in 2023);

The offense "Breach of trust" is committed when a person who has been entrusted with another person's property or financial resources, or has been given power to manage them, misappropriates, uses them for their own benefit, or disposes of them unlawfully. More specifically according to article 390 of Greek Penal Code the individual found guilty of **misappropriation, improper use, or unauthorized disposal** of property entrusted to him (such as public property) due to intention, can face imprisonment, which may vary in length depending on the specific circumstances of the case. The penalty is typically **imprisonment of up to 5 years**. In more serious cases, or if the defendant has abused their position or authority (for example, in the case of employees or public officials), the penalty can be more severe.

(iv) between now and June 2025, if there are any developments concerning investigations, prosecutions and adjudications of corruption offences, including high-level, please keep us informed in case of updates to the statistics provided in Annex I of your written input from January 2025.

Following the submission of our written contribution last February, which included all available statistics for the year 2024 in Annex I, no official statistical data on investigations, prosecutions and court decisions on corruption offences, including high-level offences, have been extracted since then, as the current structure of the information system of the Ministry of Justice (JustStat) provides for the extraction of statistics on an annual basis.

2. Are there any developments in relation to investigations, prosecutions and adjudication of foreign bribery offences?

The strengthened legislative framework is very recent.

We would like to recall that the legislative amendments introduced by Articles 38 and 39 of Law 5090/2024 decoupled the crimes of bribery and corruption under Articles 235 and 236 of the Penal Code from the value of the benefit. This reflects and expands the regulatory scope of the fundamental offence of bribery and corruption, including cases involving employees or officials of any public international or supranational organization or body, regardless of whether it is based in Greece or whether Greece is a member.

Additionally, the framework for the imposition of fines was tightened in accordance with Recommendations Nos. 5a, 5b, 6a, 6b, and 6c of the OECD.

Article 66 of Law 5090/2024 extended the jurisdiction of the Prosecutor for Economic Crime to include offences involving the foreign public sector.

Finally, Article 134 of the same law introduced, for the first time, independent criminal liability of legal persons and entities for corruption offences, in line with OECD Recommendations Nos. 13a and 15a & 15b (4th cycle, 2022).

Already, the first results are tangible, as evidenced by statistics reported in the initial written submission, which, among other things, highlight two ongoing cases of corruption involving foreign officials.

3. Could you please elaborate on your plans to adopt a single corruption case management protocol referred to in your written input (p. 54) in terms of its objective, the process, the stakeholders that will be linked to this system etc.? Is the project proposal still on track for Q2 2025?

A. Overview of the Register's Scope

The project aims to establish a **Digital Register for Monitoring Corruption Cases** that will interconnect all involved bodies and authorities through digital interoperability. Every case under investigation concerning corruption offences will be recorded from the outset in a unified digital system. This system will be updated in real time with the necessary data by the designated, accredited officer of the competent handling authority and will be centrally monitored at every procedural stage (e.g. registration of the investigation order for the complaint, submission of audit report or preliminary findings to the Public Prosecutor, initiation of criminal prosecution or archiving of the case, pre-trial proceedings, procedural coercive measures, content of indictment or acquittal orders, referral of the case to court, and the content of final, definitive, and irrevocable judicial decisions). The system will ensure digital interoperability among relevant authorities.

Cases will be classified as corruption-related based on a predefined list of offences compiled by a designated committee, drawing on national legislation and international instruments (e.g., OECD and UN Conventions).

The **Ministry of Justice** will oversee the Register and produce an annual report, while the **Ministry of Digital Governance** will handle technical development and support. All data will be anonymized to

protect legal confidentiality and individual rights. Public access will be limited to aggregated statistical information.

B. Purpose and Benefits

The Register will enhance **transparency, coordination, and accountability** across the public and private sectors. It will support evidence-based policymaking by providing insights into:

- qualitative and quantitative characteristics of investigated corruption cases,
- processing timelines throughout pre-trial, investigative, and trial phases,
- case outcomes
- the effectiveness and gradation of sanctions per type and category of offence.

Ultimately, this will result in the creation of a tool offering a realistic depiction of the Greek State's anti-corruption response, revealing any gaps or shortcomings and supporting the design of targeted improvements.

At the same time, the Register's operation will ensure the collection of reliable statistical data in compliance with Greece's obligations under international and European anti-corruption frameworks, contributing to transparency and reinforcing citizens' trust in institutions.

C. Composition and Mandate of the Committee - Next Steps

A **multi-agency committee** will be established, including representatives from key ministries and authorities (General Secretariat for Coordination, Ministry of Justice, Ministry of Citizen Protection, Ministry of Digital Governance, Economic Crime Prosecutor's Office, National Transparency Authority, Independent Authority for Public Revenue etc)

Its mandate includes drafting the legal and technical framework for the Register's operation (i.e. the list of corruption-related criminal offences to be included, the process and competent authorities with access, required fields and data input structure, managing entities, methods of monitoring and maintaining statistics, as well as any additional technical specifications and operational requirements)

At this stage, the **technical note of the project is being finalized. The ministerial decision** to establish the committee is expected imminently (Q2 2025).

4. Following the changes to the law on asset declarations in August 2024 (Law 5130/2024):

General Introduction to Law 5130/2024 (Official Gazette A'127), which strengthened the system for the control of asset declarations under Law 5026/2023 (Official Gazette A'45)

Law 5026/2023 (A'45) reformed the legislative framework concerning the submission of asset declarations by systematizing the existing rules, introducing the possibility of obtaining declaration data (such as bank statements) through interoperability, and enhancing the effectiveness of controls.

Law 5130/2024 (A'127) amended Law 5026/2023 to further strengthen the overall system of submission and control of declarations, aiming to make it more functional and effective.

In particular, the new Law 5130/2024 expanded the number of public and private entities interoperating with the electronic application system (www.pothen.gr), and increased the fields of the declarations that are automatically completed through interoperability. At the same time, controls were reinforced, as Law 5130/2024 for the first time introduced the mandatory completion of asset fields through interoperability (whereas under Law 5026/2023, interoperability was optional rather than obligatory).

Specifically, under the new legislative framework (article 21 of Law 5026/2023, as amended by Law 5130/2024), all obligated persons are required to automatically complete their declarations by extracting the following data through interoperability:

- (a) balances of bank accounts, investment products, precious metals, and currencies;
- (b) safe deposit box holdings;
- (c) data on vehicles of all types, including watercraft and aircraft;
- (d) holdings in companies or enterprises as recorded in the General Commercial Register (G.E.MI.);
- (e) data on any loan obligations.

Thus, the new provisions significantly facilitate the liable persons in completing their asset declarations, as the abovementioned assets under Article 21(6) are automatically imported into the declaration form through the electronic application, along with the corresponding documentation. Liable persons are therefore relieved of the burden of manually collecting and submitting the data from banks and other institutions.

Naturally, liable persons retain the ability to correct pre-filled entries and to submit comments with relevant supporting documentation. However, any such corrections remain visible to the auditing bodies, thus facilitating the auditing process.

It should be emphasized that the introduction of mandatory interoperability not only simplifies the declaration process for liable persons but also more effectively serves the core objective of Law 5026/2023: enhancing transparency, increasing the number of controlled declarations, improving quality, and boosting the effectiveness of asset controls. By removing sole reliance on the declarant for information entry, the system now automatically pre-fills declarations with data obtained directly

from interoperating entities (credit institutions, financial institutions, G.E.MI., etc.), providing auditors with a complete and verified asset profile. As a result, the Central Audit Committee (CAC) will be able to achieve its annual audit objectives more easily, without requiring an increase in personnel, since most data is now supplied automatically.

Furthermore, the Greek asset declaration control system is particularly broad in both the scope of its checks and the range of persons subject to control. It applies to a wide array of individuals exercising decisive powers and/or managing public funds, including: i) Members of the Government, political party heads, Members of Parliament and European Parliament, political party financial officers, secretaries-general of Parliament and Government, ministerial associates, etc.; ii) Regional governors, mayors, members of municipal and regional financial committees, general managers of municipal legal entities etc; iii) Directors-general of ministries, public bodies, and state-owned or subsidized private law entities etc; iv) The Director and Deputy Directors of the National Intelligence Service and the Civil Aviation Authority; v) Forestry officers, members of urban planning councils and archaeological councils; vi) Immigration permit directors of the Ministry of Migration and Asylum etc; vii) Judges, prosecutors, notaries etc; viii) Financial sector officials (e.g., Bank of Greece directors, banking and investment executives); ix) Media sector officials, journalists; x) Armed forces and security forces personnel, auditors, sports federation officials, referees etc; xi) Officials in public procurement and healthcare; xii) Driving examination board members; xiii) Civil society organization (CSO) heads and managers (if subsidized by the state).

Additionally, the spouses of liable persons, whether Greek or foreign nationals and regardless of residence, are also subject to declaration obligations.

a. What is your general assessment of its implementation and enforcement?

According to the data from the General Secretariat for Information Systems and Digital Governance, responsible for the asset declaration platform (e-pothen), the submission of declarations for the years 2023–2024 was successfully completed using the new platform, marking a significant reform that enhances transparency and the rule of law in Greece.

The total number of annual declarations submitted was:

297,349 for 2023, and 305,942 for 2024, for a cumulative total of 603,291 declarations.

Key achievements of the new platform include:

For the first time, assets were automatically extracted from 124 financial institutions, pre-filling relevant sections (bank accounts, investment products, safe deposit boxes, loan obligations, precious metals, and currencies). For instance, data were obtained from 2,411,709 bank accounts in 2023 and 2,384,757 in 2024.

Company holdings were sourced through interoperability with the General Commercial Register (G.E.MI.).

Declaration accuracy and correctness were enhanced, as users no longer manually entered asset data, eliminating many potential errors or omissions. Notably, previously undeclared accounts were identified.

Transparency was strengthened, controls were expedited, and audit efficiency was improved, with full automation of data collection from relevant institutions.

Separate filings by spouses were implemented according to legal provisions.

Liable persons avoided lengthy wait times, as there was no longer a need for physical visits or manual data retrieval via e-banking.

Additionally, interoperability extended to obtaining:

- Contact information from the National Communication Register (EMEP), and
- Assets (income, real estate, vehicles) from the Independent Authority for Public Revenue.

The successful completion of the reform was the result of collaboration among the Ministries of Justice and Digital Governance, the Central Audit Committee, the National Transparency Authority, the Bank of Greece, the Hellenic Capital Market Commission, the Union of Greek Banks, and other financial institutions.

b. 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?

There appears to be a misunderstanding regarding the scope and intent of Article 13 of Law 5130/2024. Contrary to what has been suggested, Article 13 does not concern the reduction of the general retention period for asset declarations from fifteen to five years. Rather, it sets out the rules for the retention of **personal data** collected through the newly introduced interoperability system, fully aligning with requirements stemming from European Union data protection legislation.

Specifically, under Article 13, the personal data of liable persons — whether transmitted directly by interoperating bodies such as credit institutions or entered by the individuals themselves — must be retained for a period of **five years** following the expiration of the deadline for submitting the declaration. This time frame corresponds to the period during which controls on declarations are lawfully conducted, as stipulated in Article 28(2) of the same law. If, however, a control uncovers indications or fresh evidence suggesting the commission or attempted commission of a felony, the retention period is extended to **fifteen years**, in line with the relevant limitation period for felonies.

This legislative choice is fully consistent with European legal standards. In particular, the EU Directive 2015/849 on the prevention of money laundering and terrorist financing (Article 40) prescribes a **five-year** retention period for personal data, with a possibility for extension under strict conditions and solely in cases such as criminal investigations. Law 5130/2024 follows a similarly cautious and

proportionate approach, thereby ensuring both the protection of personal data and the effectiveness of controls.

The introduction of interoperability mechanisms — where sensitive financial and asset information is transmitted directly by institutions to the competent authority — made it necessary to clearly define the retention period for such data. In this context, consultations were held with the Hellenic Data Protection Authority during the drafting process. The Authority did not express any objections or reservations regarding the proposed framework.

Moreover, the provision of Article 13 is in full harmony with established case law, particularly the Plenary Session Decision 2647/2017 of the Council of State, which emphasizes that audits involving personal data must be carried out within a reasonable time, and that data retention must be limited strictly to what is necessary for the purposes of the control. Upholding the principles of legal certainty, proportionality and the rule of law, the regulation strikes a careful balance between ensuring efficient control and safeguarding the rights of individuals.

It is also important to clarify that the regulation cannot be seen as weakening the effectiveness of controls. On the contrary, ensuring that audits are conducted promptly — while the liable persons are still actively engaged in public functions — enhances their credibility and effectiveness. Particularly for high-risk categories such as politicians, judges, and prosecutors, annual audits are mandatory, guaranteeing continuous scrutiny.

In fact, retaining personal data beyond the necessary period, without a valid legal basis, would not only infringe upon fundamental rights but could also impede the proper functioning of the control mechanism, potentially leading to inertia and ineffective oversight.

In conclusion, the five-year retention period — extendable to fifteen years in cases involving serious criminal indications — provides an adequate and proportionate timeframe for audit authorities to fully perform their duties, without compromising the protection of personal data or the broader principles of legal certainty and good governance.

c. 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?

Similarly, this question appears to arise from a misunderstanding, as it does not correspond to any provision contained in the law.

In particular, Article 8 of Law 5130/2025 provides that asset declarations must be submitted annually by liable persons for as long as the exercise of their duties or their specific status continues, and for one (1) year after the loss of such status. However, for certain categories — namely political persons (subject to Article 4 of Law 5026/2023), regional governors and mayors (Article 6(a) of Law 5026/2023), and judges and prosecutors (Article 8(1)(a) of Law 5026/2023) — the obligation to submit asset declarations continues for a period of three (3) years following the cessation of duties or the publication of the termination of the term of office in the Government Gazette.

It should be emphasized that Law 5026/2023, as currently in force, faithfully reproduces the corresponding provision of the previous Law 3212/2003 regarding the obligation to submit asset

declarations after the end of the relevant status, both in terms of the duration of the obligation and the specific categories of persons concerned (see Article 1(2) of Law 3212/2003, Official Gazette A'309).

Therefore, the claim that Article 8 of Law 5130/2025 reduced the obligation to submit asset declarations after loss of status for broad categories of public officials from three years to one year is unfounded. As is evident from a straightforward reading of the relevant legal provisions and the accompanying explanatory memorandum, Article 8 of Law 5130/2025 did not alter the substantive content of the obligation. Instead, it merely corrected the wording of Article 18 of Law 5026/2023, which had previously been insufficiently clear and had created difficulties in its application.

5. In your view, are the reporting channels for whistleblowers working well? Do you think that the lifting of witness protection last October in the Novartis case could have a chilling effect on future whistleblowers wishing to report on allegations of corruption?

Legal Framework for Whistleblower Protection in Greece

Greece has established a robust legal framework for protecting whistleblowers (public interest witnesses) from retaliation. Key legislative provisions include:

Law 4557/2018 (Art. 26): Whistleblowers are protected from retaliation or intimidation, in line with Art. 9 of Law 2928/2001.

Law 4990/2022 (Art. 18): Incorporating EU Directive 2019/1937, this law ensures whistleblowers bear no liability for acquiring or disclosing information and are protected from related legal actions (e.g., defamation or IP breaches). Ongoing criminal, disciplinary, or administrative proceedings are also suspended.

Code of Criminal Procedure (Art. 218): Public interest witnesses reporting offences such as bribery or corruption—without personal involvement or gain—receive protection, including: police protection, testimony via audio-visual means, concealment of personal identity, relocation or identity change, transfer or reassignment of public servants outside standard procedures.

Code of Criminal Procedure (Art. 47): Provides for immunity from prosecution for offences like perjury or defamation when committed in the context of whistleblowing, subject to approval by specialized prosecutors. The status of public interest witness can be revoked.

Civil Service Code (Law 3528/2007):

Art. 26(4): Whistleblowers cannot be excluded from promotion, subjected to disciplinary action, or treated unfavorably in career advancement, transfers, or dismissals while the case is under judicial investigation.

Art. 110(6): If disciplinary action is taken against a whistleblower, the disciplinary body must prove it is unrelated to the whistleblower's contribution.

It is true that a state governed by the Rule of Law must ensure that citizens feel protected from corruption—both in general and, in particular, when they contribute vital testimony to combating it. On the other side, this protection should not extend to individuals who knowingly make false and

malicious allegations. Granting such protection would undermine the very purpose of the public interest witness (whistleblower) framework and risk compromising the integrity of democratic institutions and the justice system. However, it is essential to underscore that the revocation of a witness's protected status must be always ordered by a judicial officer.

In Greece, the possibility to both grant and revoke public interest witness status at any stage of criminal proceedings (if the prosecutor determines that the conditions for the original designation either never existed or no longer apply) has been in place for corruption-related cases since 2014 (Law 4254/2014).

Furthermore, since 2019, Greek law (Article 47 of Law 4620/2019) has established the obligation to revoke any prior decision of non-prosecution once such protected status is withdrawn.

The recent amendment to Article 218(7) of the Code of Criminal Procedure was introduced to align systematically with this framework and ensure its legal completeness.

In conclusion, Greece has developed a comprehensive and coherent framework for the protection of public interest witnesses. The revocation of whistleblower protections in corruption cases is carried out strictly in accordance with the substantive and procedural guarantees established by law, fully aligning with EU legal standards. While the protection of whistleblowers is fundamental, it cannot be absolute; such protection may be revoked when the testimony is proven to be false and malicious.

6. [In writing] 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'):

- a. Code of Conduct for Political Appointees and Special Advisors.**
- b. Code of Conduct for Members of Government and Members of Parliament.**
- c. Code of Conduct for Public Procurement Professionals.**
- d. Guidelines on the Code of Ethics for the Police.**

For the response to this question, please refer to the replies provided by the Ministry of Interior, the Secretariat General for Legal and Parliamentary Affairs, the Hellenic Police and the National Transparency Authority. Additionally:

c. Regarding the Code of Conduct for Public Procurement Professionals, we would like to note that OECD has created a Draft "Code of Conduct and Guidance to enhance integrity amongst public procurement practitioners in Greece" as a Deliverable titled "Risk-based methodology for auditing in public procurement supported by training materials and workshop(s)" in the context of the TSI Program "Enhancing transparency and integrity in the public procurement system through an integrated risk management".

This draft is now being finalized, by OECD and NTA, and will be used as a prompt and guidance in order for the Ministry of Development to adopt, probably in the form of Ministerial Decision or a Circular, a Code of Conduct for Public Procurement Professionals. It is expected that the Code of Conduct will be adopted by end 2025.

7. The situation on resources for the NTA seems to have deteriorated rather than improved in the past months (139 unoccupied posts compared to 122 in March last year and 103 in 2022). What are the problems? Will you fulfil your recruitment targets planned for 2025 (mentioned on p. 55 in the written input)? Has the call for the appointment of the NTA Governor (in Q1 2025) been issued yet?

8. Are the preparations for the new NACAP 2026-2029 on track?

9. What is your assessment of the functioning of the lobbying legislation and registration in the transparency register (only a modest increase in registrations so far)?

For the response to the above questions 7- 9, please refer to the replies provided by the Ministry of Interior, the National Transparency Authority and the Secretariat General for Legal and Parliamentary Affairs.

10. 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 changing trends in the corruption high-risk sectors in the past year?

- It should be reminded once more that we have extended according to article 20 of Law 5095/2024 the scope of application for whistleblowers, which for the first time includes corruption offences (bribery, corruption and trafficking in intermediaries).

-We would also like to remind **article 205 of the new Law 5187/2025** (GG A 48), which introduces an amendment to Article 187C of the Criminal Code on Favourable Measures based on the principles of proportionality and necessity, providing a strong incentive to disclose information that facilitates the authorities in solving serious crimes (please see above, Pillar II, question 1).

- We are working on and expect to include in a forthcoming draft law a provision that will implement into national law Article 147 of Regulation 2023/1114 extending the scope of the law regarding whistleblowers to cryptocurrencies.

Follow- up questions

3. [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?

Please refer to the answer given by the Police.

4. [NTA] state of play of preparations of the new NACAP (risk assessment first semester and consultation second semester); state of play on resources / staffing situation, including procedure to select a new Governor; any updates on lobbying registrations or other developments;

Please refer to the answer given by NTA

5. [CIDA] Please provide any updates, since the country visit on asset declarations and political party financing, including audits, investigations, breaches, sanctions etc. Have you finalised the audit of parties of the June 2024 European Parliament elections and if so, are there are breaches and/or follow-up to report?

Please refer to the answer given by the CIDA

5. What is the state of play of the Integrated Licensing and Inspections Management System (ILIMS) (operationalisation foreseen for February 2025)? If operational, is it already being used by businesses?

OpenBusiness supports the digital processing of licensing procedures, serving both citizens and businesses, as well as the public administration, in a two-way interaction. It is accessible online 24 hours a day, 7 days a week. The new information system fully supports the licensing process for 57 major economic activities, corresponding to approximately 2,500 activity code numbers (KAD). It went into productive operation on February 5, 2025, and to date, 30,000 licensing actions have been finalized, the vast majority by businesses. It is an important tool for improving the business environment, significantly contributing to the reduction of bureaucracy and the enhancement of transparency.

Pillar III. MEDIA PLURALISM AND MEDIA FREEDOM

1. Similarly, to 2023, the written input mentions that the Ministry of Justice has made the adoption of Directive (EU) 2024/1069 a priority. Can you provide us with further information on the timeline and concrete initiatives that have been concerning strategic litigation against public participation (SLAPP) since the last report, on both legislative and non-legislative safeguards?

The Ministry of Justice's commitment to transpose Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation') within the timeframe foreseen, is confirmed, as a relevant decision of the Minister of Justice was published in the Government Gazette (No. 3720oik./F.374 /21-01-2025, Government Gazette 43), with the aim to establish a special legislative committee for its transposition into domestic law, which is expected to start its work in the near future.

It should be noted that this committee includes judges, academics, lawyers and members of the relevant Task Force set up at the General Secretariat for Information and Communication to strengthen the protection and safety of journalists.

The Ministry of Justice also participated in the first workshop on the transposition of the Directive 2024/1069 implemented by the European Commission on 29 November 2024, where it emphasized the provisions of national law, which are in accordance with the relevant provisions of the Directive 2024/1069 and the measures foreseen already exist at national level (right to full compensation of the defendant, burden of proof on the plaintiff, possibility of legal remedy) or can be introduced in our national legislation (pre-control and rejection of any manifestly abusive claim).

The second workshop has already been scheduled for May 14, 2025, in which representatives of the Ministry of Justice will participate.

With regard to the legislative and non-legislative measures that are mentioned in our written contribution it should be noted that they were presented to the respective working group of the European Commission (Just-anti-SLAPP-Expert Group) by sending two different reports (on 20-09-2024 and 27-11-2024) as also reflected in the working document of this working group (5801/25 Commission Staff Working Document No. 5801/25 of 30-01-2025).

Furthermore, a member of the Office of the Deputy Minister of Justice and member of the Task Force for the protection of Journalism, as a representative from the Ministry of Justice has gained valuable knowledge of the new legal framework recently adopted through his participation on the 2nd European Conference against SLAPPs, which was organised by the Council of Europe (CoE), the Coalition Against SLAPPs in Europe (CASE) and the European Centre for Press and Media Freedom (ECPMF), and took place on 14 November 2024, at the Palais de l' Europe, in Strasbourg. The conference tackles various topics, including legislative efforts at national level., a personal testimony of journalist, the presentation of the new legal instruments at both European Union and Council of

Europe level, especially the Recommendation of Committee of Ministers of the Council of Europe CM/Rec(2024)2 on countering the use of strategic lawsuits against public participation (SLAPPs) adopted on 5 April 2024 and the Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation') and their possible complementarity, as well as the relevant case law of the European Court of Human Rights on Art. 10 of the European Convention of Human Rights. At the same time, attention was given to the role of civil society organisations in addressing the phenomenon of SLAPPs with emphasis on the CASE working groups operating in certain European countries and to the training's programmes and the various tools for collecting data on relevant cases in order to create a framework for transparency.

The member of the Office of the Deputy Minister of Justice presented the findings and results of the conference to the aforementioned Task Force. Finally, we would like to note that the Ministry of Justice participated in the meeting of the European Commission Expert Group against SLAPPs, which was held online on Wednesday, April 30, 2025. The Ministry was represented by the Legal Advisor to the Deputy Minister, who has been designated as the contact person for the transposition of Directive (EU) 2024/1069, as well as the focal point for the implementation of Commission Recommendation (EU) 2022/758."

2. The written input mentions that during the year 2024, the Task Force on the Protection, Safety and Empowerment of Journalists and Media Professionals focused on gender-based challenges in the media, the safety of journalists in conflict situations and collecting suggestions directly from media professionals to government officials, taking into account European standards for the protection of journalists. Can you provide us more details on this, as well as on the follow-up to this consultation?

For the response to this question, please refer to the answer provided by General Secretariat for Communication and Media.

3. [in writing] Is the investigation into the murder of journalist Giorgos Karaivaz definitely closed following the acquittal of the two accused persons in July 2024?

The investigation carried out by police and judicial authorities in order to identify the physical and moral perpetrators of the murder of the journalist G. Karaivaz has not been closed. Prosecution for the crime of manslaughter is always in rem connected to the act and until the statute of limitations for the act, which is 20 years from the time of the crime, efforts to identify the perpetrators continue unabated and, in every direction, until they are detected. The acquittal decision of the Mixed Jury Court disconnected the two defendants from the act in the absence of incriminating evidence against them, but the investigations to identify the unknown perpetrators of the murder of the journalist continue.

4. Do you have any updates on measures to address instances of surveillance of journalists, including the use of illegal spyware? Has the presidential decree foreseen in Article 13 of Law 5002/2022 been adopted?

The Council of State has issued an opinion on the record concerning the draft of Presidential Decree No. 12/2024, according to which the draft is deemed legal, subject to certain individual remarks. The decree is expected to be returned with final comments from independent authorities, such as the Hellenic Authority for Communication Security and Privacy, after which the publication process in the Official Gazette is expected to proceed.

In any case, we recall that Article 13 of Law 5002/2022 provides for an exception to the provisions of Article 12 of the same law, which introduced a prohibition on the distribution of software, surveillance devices, and other related data through the addition of Article 370F to the Penal Code. As the presidential decree has not yet been issued, the general prohibition on the use of surveillance software established by Article 12 remains in force and is punishable by severe prison sentences ranging from 2 to 5 years.

For the responses to the remaining questions of Pillar III (5-12, 14- 17), please refer to the answers provided by General Secretariat for Communication and Media.

For the response to question 13 of pillar III, regarding the legal framework governing access to public information, please refer to the answer provided by the Ministry of Interior

Pillar IV CHECKS AND BALANCES

For the responses to the questions 1-8 of Pillar IV, please refer to the answers provided by the Secretariat General of the Prime Minister and the Secretariat General for Legal and Parliamentary Affairs.

9. How do you intend to follow up on the report by the Ombudsman on the Pylos shipwreck investigation? How do you respond to criticism that the reaction of the Government to the Ombudsman's report could have been seen as lack of respect for the independence and status of the institution?,

Upon assuming office, the Minister of Maritime Affairs and Insular Policy was immediately briefed on the findings of the report issued by the Greek Ombudsman concerning the shipwreck of the fishing vessel "ANDRIANA", which occurred in international waters (off the coast of Pylos) on 14 June 2023. According to the said report, eight officers of the Hellenic Coast Guard, including senior-ranking officials, were deemed subject to disciplinary scrutiny for a series of alleged offenses. The report was submitted to the Minister of Maritime Affairs in accordance with Article 1(4) of Law 3938/2011. Pursuant to this provision, the exercise of the Minister's disciplinary jurisdiction with regard to the acts and/or omissions attributed to the officers in question is governed by "the respective disciplinary law of each service."

In light of the foregoing, the Minister submitted a formal request for a legal opinion to the Legal Council of State, seeking guidance on the appropriate disciplinary procedures to be followed, particularly taking into consideration the hierarchical positions of the officers involved, in order to preclude any potential conflicts of interest in the assignment of the administrative inquiry (ΕΔΕ). The submission of this request was necessitated by the legal framework in force, as any erroneous interpretation or application of the relevant provisions could potentially result in the invalidity of the proceedings. A response from the Legal Council of State is expected within a short timeframe, in order to ensure that the relevant disciplinary jurisdiction is exercised promptly and in accordance with legally clarified conditions and requirements.

With regard to the substantive findings on operational conduct, instructions have already been issued to the leadership of the Hellenic Coast Guard to expand training seminars and continuing education activities for all personnel involved in similar operational actions. Emphasis is being placed on strict adherence to operational protocols, appropriate sequencing of actions, comprehensive documentation, and the immediate notification of all competent authorities, including the political leadership. The leadership of the Hellenic Coast Guard is currently in the process of updating relevant guidelines to ensure compliance with operational protocols and to align them properly with recent judgments of the European Court of Human Rights.

10. What are the next steps regarding the appointment of a new Ombudsman?

11. Could you please provide more information on the study on improving the functioning of the independent authorities?

12. Pursuant to article 20(1) Law 4622/2019 the statutes of all independent authorities are adopted, amended, repealed by decision of those authorities, without prejudice to applicable specific rules. According to the information you provided, the new statute of the Hellenic DPA has been adopted by Presidential Decree 30/2024, pursuant to the specific rules set out in Article 18(3) Law 4624/2019. Could you please provide information on the applicable rules governing the adoption of the statutes of the other four constitutionally protected independent authorities? Could you elaborate on the reasoning behind perhaps different applicable rules, thereby considering the enhanced requirements for independence of the five constitutionally protected authorities?

For the responses to the questions 10-12 of Pillar IV, please refer to the answers provided by the Ministry of Interior.

13. The 2024 Rule of Law Report referred to the importance of effective and timely investigations into incidents of alleged misconduct involving state officials. Could you please provide information in this respect, including statistical data if any.

14. Greece has been under enhanced supervision for the group of cases *Sidiropoulos and Papakostas v. Greece* concerning ill-treatment by law enforcement agents as well as the lack of effective investigations. What measure is Greece taking to address these issues? Likewise, what actions, if any, does Greece intend to take following the judgment of the European Court of Human Rights (*A.R.E. v. Greece*) of 7 January 2025?

Answers to questions no.13 and 14

In our view, question No. 13 and part of question No. 14 relate to issues of ill-treatment by law enforcement agents, whereas the remaining part of question No. 14 concerns the Government's response to the judgment delivered by the Court on 7 January 2025 in the case of *A.R.E. v. Greece* (No. 15783/21).

Regarding the Government's response to the judgment of the Court in the case of *A.R.E. v. Greece* (No. 15783/21)

The judgment delivered by the Court on 7 January 2025 in the case of *A.R.E. v. Greece* (No. 15783/21) is not final, as on 4 April 2025, the Government submitted a request for referral of the case to the Grand Chamber, which is currently pending before the panel of five judges of the Grand Chamber, in accordance with Articles 43 and 44 §2 of the Convention.

As a result, no execution measures are envisaged at this stage.

Regarding measures taken or envisaged to combat ill-treatment by law enforcement agents

The issue of effective and timely investigations into incidents of alleged misconduct involving state officials (Question 13) is a matter that overlaps with Convention compliant investigation in cases of ill-treatment by law enforcement agents, consistently highlighted by the Court in its case law, as well as by the Committee of Ministers, in the context of its supervision of the execution of the Court's judgments in the *Sidiropoulos and Papakostas* group of cases (question 14).

The *Sidiropoulos and Papakostas* group of cases includes the following judgments:

State	Case Title	Application Number	Date of Judgment
GRC	Sidiropoulos and Papakostas v. Greece	33349/10	25/01/2018
GRC	Konstantinopoulos and Others v. Greece (No. 2)	29543/15	22/11/2018
GRC	Torosian v. Greece	48195/17	07/07/2022
GRC	B.Y v. Greece	60990/14	26/01/2023
GRC	Alkhatib v. Greece	3566/16	16/01/2024

These cases concern the following types of violations of the European Convention on Human Rights:

1. Violation of the substantive limb of Article 2 (right to life) in *Alkhatib*, due to the lethal use of fire-arms by law enforcement agents.

This violation highlights the obligation of the State to ensure that the use of force by law enforcement is strictly necessary and proportionate.

2. Violation of the substantive limb of Article 3 (prohibition of torture and inhuman or degrading treatment) in *Konstantinopoulos and Others No. 2*, due to ill-treatment inflicted by police officers.

This judgment underscores the obligation of State agents to respect the absolute prohibition of ill-treatment, particularly during arrest or detention.

3. Violations of the procedural limbs of Articles 2 and 3, due to the failure to conduct effective investigations into alleged deaths or ill-treatment during law enforcement operations:

These procedural violations reflect the State's duty to carry out prompt, thorough, impartial, and independent investigations capable of leading to the identification and punishment of those responsible.

Since 2012, the Committee's examination of the execution of the relevant judgments has focused on the effectiveness of the measures adopted to ensure that incidents of ill-treatment are thoroughly investigated, both at the criminal and administrative levels, with a view to fully establishing the facts and ensuring that those responsible are held accountable through the imposition of appropriate sanctions.

In this context, the Committee has called upon the Greek authorities to:

- a) Establish an independent mechanism to investigate or oversee administrative inquiries into allegations of ill-treatment;
- b) Amend the definition of "torture" in the Criminal Code, so as to bring it into full conformity with the standards set out in the United Nations Convention Against Torture;
- c) Provide regular, targeted professional training to law enforcement personnel, with a focus on the prevention of ill-treatment and the promotion of a culture of respect for human rights; and
- d) Ensure that criminal investigations into such cases are thorough and effective, leading to sanctions that are not only appropriate but also have a sufficient deterrent effect.

The Greek Government has provided effective responses to all the above-mentioned issues, as communicated to the Committee through the regular submission of official communications.

On 2-3 April 2025, a delegation of officials from the Department for the Execution of the Court's Judgments carried out a mission to Athens in order to hold consultations with the Greek authorities regarding the measures adopted or envisaged for the execution — among others — of the judgments in the *Sidiropoulos and Papakostas* group of cases, as well as the judgment in *Safi v. Greece* (No. 5418/15). The information provided to the delegation, together with the responses to the questions raised by the Committee of Ministers, is included in the Communication/Updated Action Report submitted by the Greek Government on 24 April 2025. The above mentioned information contained in the said Communication/Updated Action Report is set out below.

Statistical data and qualitative information on criminal investigations into ill-treatment by law enforcement agents

By its decision taken at its 1483rd meeting (December 2023), the Committee of Ministers invited the Greek authorities to provide statistical and qualitative data on criminal investigations concerning allegations of ill-treatment by law enforcement agents, including information on outcomes, in order to assess the impact of the measures taken.

According to the 2023 report of the Directorate of Internal Affairs of Enforcement Bodies, a total of 522 complaints were filed: 460 concerning police officers and border guard personnel, and 62 involving coastguard officers.

Following the processing and investigation of these complaints, criminal charges were brought against 182 police officers, and 22 charges were filed against coastguard officers and civilian personnel of the Ministry of Maritime Affairs and Insular Policy.

The complaints concerned not only offences qualifying as ill-treatment within the meaning of the Court's case law and as defined by Greek legislation, but also a number of unrelated offences, such as forgery of documents, breach of official secrecy, and breach of duty, among others.

With respect to criminal charges brought specifically for acts of torture, violations of human dignity, bodily harm, and other unlawful acts of violence, the following charges were filed against police officers:

- a) Torture and other violations of human dignity (Article 137 of the Criminal Code): 12 cases
- b) Bodily harm (Article 308): 1 case
- c) Dangerous bodily harm (Article 309): 12 cases
- d) Serious bodily harm (Article 310): 2 cases
- e) Bodily harm against vulnerable persons (Article 312): 4 cases.

No criminal charges were brought against Coast Guard agents for the above-mentioned offences during the reporting period. Unfortunately, no data are currently available regarding the outcomes of the corresponding criminal proceedings. However, based on the available information, it appears that the number of cases that could be classified as torture or other acts against human dignity has significantly decreased.

Furthermore, following dissemination of the Court's judgment in B.Y the Prosecutor of the Supreme Criminal and Civil Court (Court of Cassation) addressed to all prosecutors Circular no. 18/2023. The main points of said circular are as follows:

*a) the judgment of the European Court of Human Rights in the case B.Y. v. Greece, and
b) the accompanying document prepared by the Agent, highlighting the Court's reasoning, so that all prosecutors in your department may be informed and align their actions accordingly in any similar case. Prosecutors are requested, after reviewing the background of the case, to pay particular attention to paragraphs 58 to 66 of the Court's judgment, as well as to paragraphs 5 and 9 of the Agent's document.*

In brief, the case B.Y. — which was filed at the domestic level on 26 February 2014 and concerned the non-identification of the perpetrators — was found by the Court not to have been investigated in accordance with its established standards. Specifically, the investigation was neither swift nor thorough, as required in similar cases. It failed to adequately establish the facts, to collect and secure all relevant evidence, to obtain comprehensive statements from victims and witnesses through appropriate questioning, and to conduct a proper inquiry aimed at identifying those responsible and imposing sanctions where appropriate.

Furthermore, the investigation was found to lack the required independence and impartiality, and overall, it was deemed inadequate and ineffective for the specific reasons set out in the judgment.

The Committee of Ministers of the Council of Europe, at its 1475th meeting (September 2023), deemed that the execution of the judgment at issue should be examined together with the judgments in the Sidiropoulos and Papakostas group of cases (Application No. 33349/10). In this group of judgments, the Committee examines whether the appropriate measures have been taken with a view to preventing violations of the procedural limb of Articles 2 and 3 of the Convention, due to shortcomings in criminal investigations conducted by domestic courts.

Further to our Circular No. 8/26-5-2022, we consider that the prosecutors of the country, who act with vigour (a quality constituting an inspection criterion under Article 102 §2(a) of Law 4938/2022) and with a high sense of justice, and whose independence is constitutionally guaranteed, will ensure that criminal investigations in all cases are conducted swiftly, thoroughly, impartially and effectively”.

Effective disciplinary (administrative) investigations

Change of legislation

Presidential Decree No. 61/2024 introduced substantial reforms to the disciplinary framework governing the uniformed personnel of the Hellenic Police. The primary objectives of the reform are the removal from active duty of personnel involved in serious criminal or disciplinary offences, the more effective management of corruption cases, the streamlining of bureaucratic processes, and the expedited administration of disciplinary justice.

Key provisions include:

- a) Alignment of disciplinary sanctions with the revised Criminal Code, ensuring proportionality between disciplinary penalties and the gravity of offences;
- b) Mandatory suspension of personnel under investigation for especially serious criminal and disciplinary offences;

c) Automatic dismissal, regardless of the outcome of disciplinary proceedings, for individuals irrevocably convicted by a criminal court of felonies or specific serious misdemeanors;

d) Elimination of unnecessary internal investigations into minor incidents, such as the loss of service identification cards or off-duty injuries;

e) Extension of time limits for reopening disciplinary cases when there is a substantive divergence in the judgment of the corresponding criminal case, to guarantee the imposition of an appropriate penalty.

These amendments were adopted in accordance with relevant recommendations of the Greek Ombudsman, as outlined in the 2024 Report (p. 178) and in previous annual reports. The alignment with these recommendations reflects the state's commitment to reinforcing accountability, transparency, and efficiency in the disciplinary procedures of the law enforcement uniformed personnel.

Disciplinary Investigations into Ill-treatment by Law Enforcement Agents — Comparative Overview (2023–2024)

According to official documents provided by the National Mechanism for the Investigation of Arbitrary Incidents Involving Law Enforcement Agents, a total of 188 cases were received in 2023 and 178 cases in 2024.

Case Sources

- In 2023:
 - 140 cases (74.5%) were transmitted by the Hellenic Police,
 - 37 cases (20.2%) were lodged by citizens,
 - 9 cases (4.8%) were transmitted by the Coast Guard (including one related to the *Sa-fi v. Greece* judgment), and
 - 1 case (0.5%) was referred by Frontex.
- In 2024:
 - 133 cases were submitted by the Hellenic Police,
 - 38 cases by citizens,
 - 5 cases by the Coast Guard, and
 - For the first time, 2 cases were referred by the General Secretariat for Anti-Crime Policy, relating to alleged misconduct by penitentiary staff.

In both years, the vast majority of cases fell within the competence of the Mechanism.

Nature of Allegations (2023)

Of the 181 cases within the Mechanism's jurisdiction in 2023:

- 80 concerned alleged bodily harm,
- 41 alleged unlawful restriction of liberty,

- 26 involved a racist motive,
- 19 related to use of firearms,
- 15 concerned violations of the right to life,
- 4 involved sexual offences, and
- 3 concerned allegations of torture.

Outcome of Mechanism's Action (2023)

The Mechanism issued 103 case-file reports in 2023:

- 18 cases were returned by the Ombudsman to the Administration for supplementation or revision of reasoning,
- 15 investigations were deemed sufficient, with only general guidance provided for future cases,
- 48 cases were archived, despite identified investigative shortcomings that could not be remedied (e.g., due to lapse of time),
- 3 cases had their findings upheld, and
- 3 cases were found to fall outside the Mechanism's mandate.
- In one case, the Mechanism identified a deviation from its directions by the administrative authority and referred the matter to the competent Minister.
- Additionally, four cases previously referred to the Minister were subsequently archived by the Mechanism.

Conclusions

The following conclusions may be drawn from the above-mentioned data and information:

a) The National Mechanism has now been effectively integrated into the framework of administrative and disciplinary investigations, which should therefore be regarded as a single, coherent procedure that includes both the investigation of complaints by the competent authorities and the intervention of the Mechanism.

b) In 2023, out of 181 complaints falling within the Mechanism's jurisdiction — concerning bodily harm (42.5%), unlawful restriction of liberty (22%), racist motive (14%), use of firearms (10%), violations of the right to life (8%), sexual offences (2%), and torture (1.5%) — only 18 cases were referred back to the Administration for supplementary investigation or revision of the reasoning in the findings.

Finally, it is noteworthy that over the course of the nine years of operation of the Mechanism, the Administration deviated from the Mechanism's directives in only five cases, indicating a high level of compliance.

In response to the Committee's recommendation regarding the regular professional training of law enforcement officers

Police Officers

Establishment of specialised schools

Law No. 5187/2025, adopted on 21 March 2025, introduces comprehensive reforms under the title: "Reorganisation of the Structure of the Hellenic Police and Upgrading of the Training of Uniformed Personnel – Modernisation of the System of Electronic Surveillance of Convicts, Detainees and Prisoners on Leave – Reform of Issues Related to Electronic Surveillance in Correctional Institutions and Other Provisions."

In line with the Committee's indication, Article 134 of the law establishes a Department of Specialized Schools, responsible for the organisation, support, and operation of six dedicated training schools, focusing on the following thematic areas:

- a) Human Rights, Diversity Management and Police Response
- b) Personal Data Protection
- c) Internal Security Crisis Management
- d) Communication and Negotiation Techniques
- e) Crime Evolution
- f) Investigation of Serious and Organised Crime

These schools are aimed at ensuring the systematic and continuous training of police personnel in critical areas directly linked to the prevention of misconduct and the strengthening of human rights compliance.

Regular education provided in police academies and other institutions

The curricula of the Police Academy, as well as of the School for Postgraduate Education and Training, include dedicated courses on human rights, reflecting the commitment to the continuous education of law enforcement personnel in this field.

Participation in Human Rights Training (General Figures)

- In 2023, a total of 2,195 cadet police officers, police personnel, and border guards attended human rights training.
- In 2024, this number rose to 2,299.
- By 2025, participation further increased to 3,125 officers.

Specialised Training in Human Rights at the Borders

- In 2023, 1,632 officers underwent specialised training on "Human Rights during Border Protection".
- In 2024, 1,090 officers received the same training.
- From January to March 2025, 326 officers were trained in this area.

Targeted Training on the Rights of Vulnerable Groups

Between 2 January and 1 April 2023, a series of two-day educational programs were conducted, with the participation of 3,230 police officers, primarily those involved in operational law enforcement duties (e.g. arrests, crime investigation).

These programs focused on:

- The protection of the rights of vulnerable groups, including Roma communities, migrants, LGBTQI individuals, and persons with disabilities;
- Issues of professional behavior, including anger management and the prevention of violent conduct during arrests.

From 21 October 2022 to 1 April 2023, a total of 16,111 police officers and agents attended this training program.

Training in Detention and Return Procedures for Third Country Nationals

In 2023, 524 police officers received training on reception conditions and detention standards for third-country nationals, in seminars organized by the International Committee of the Red Cross.

In the same year, 26 police agents underwent retraining on return procedures for third-country nationals, in training sessions delivered by FRONTEX.

Hellenic Coast Guard Officers

The Committee has already been informed that, in the context of the basic training of cadets of the Hellenic Coast Guard, the regulations governing training schools at all levels have been amended to include in their curricula the “Common Core Curriculum (CCC 2017)” of the European Border and Coast Guard Agency (Frontex).

This programme includes specialised courses on human rights, the obligation to identify and protect victims of human trafficking and asylum seekers, as well as the prevention of discrimination based on race, nationality, religion, or other status.

To support the delivery of this training, eight instructors specialised in the protection of human rights have been permanently appointed to teach at the Coast Guard training institutions.

Between January 2023 and 20 March 2025, a total of 552 cadets of the Hellenic Coast Guard attended training courses covering, among other subjects, human rights and anti-discrimination.

In addition, during the same period, 203 officers of the Hellenic Coast Guard participated in seminars and workshops organised by a variety of bodies, including the United Nations High Commissioner for Human Rights, the Red Cross, the National and Kapodistrian University of Athens, and other institutions.

These initiatives reflect a systematic effort to integrate a human rights-based approach into the operational culture of the Hellenic Coast Guard. The inclusion of targeted training modules in both initial and ongoing education, combined with the active involvement of specialised instructors and co-operation with international organisations, contributes to the development of professional standards aligned with European and international obligations.

General Measures in Relation to the *Alkhatib and Others* and in *Safi and Others* cases

At their meeting with the abovementioned delegation the Greek authorities reiterated their firm commitment to integrating the findings of the Court into search and rescue operations at sea, as well as in the broader context of sea border control. In this regard, new operational guidelines are expected to be issued, aimed at facilitating the alignment of practices with the Court’s case law.

As already noted, a significant number of training sessions have been carried out for officers of the Hellenic Coast Guard, with the objective of enhancing awareness and ensuring the implementation of human rights standards in operational procedures.

With respect to the legislative framework governing the use of firearms by the Coast Guard, which was explicitly criticised by the Court in *Alkhatib*, the delegation of the Department for the Execution of Judgments of the European Court of Human Rights was informed that the authorities are currently conducting a comprehensive review of the *Alkhatib* judgment, taking fully into account the Court's findings and recommendations.

The authorities also expressed their readiness to proceed with legislative amendments, should such changes be deemed necessary to ensure full compliance with the judgment and to prevent future violations of a similar nature.

With regard to the potential establishment of an independent monitoring mechanism, the authorities have indicated that the matter is currently under consideration at a high political level, in particular in the framework of the new Pact on Migration. Further information and concrete developments will be communicated in due course. Among the options being explored is the possibility of entrusting this role to the Greek Ombudsman, taking into account the institution's independent status and proven expertise in oversight and the protection of human rights.

As concerns the use of cameras on vessels, the authorities reported that all Frontex vessels operating in the area are already equipped with cameras, as are certain vessels of the Hellenic Coast Guard. While the authorities remain open to considering additional measures that could help prevent similar violations in the future, they believe that it is premature at this stage to draw conclusions regarding a potential expansion of the existing camera policy.

Lastly, the Hellenic Coast Guard expressed its willingness to engage in technical online consultations with the Department for the Execution of Judgments (DEJ). Such exchanges are considered valuable for clarifying the scope of possible reforms and for identifying the legislative or regulatory adjustments that may be required to bring practice into full alignment with the Court's standards.

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

Please refer to the answers provided by the Hellenic Police

For the responses to the questions 16-20 and the follow-up question/update of Pillar IV, please refer to the answers provided by the Ministry of Interior and the Ministry of Migration and Asylum.