

***EUROPEAN RULE OF LAW
MECHANISM***

***INPUT FROM GREECE
ON THE 2026 RULE OF LAW
REPORT***

PLAN OF THE CONTRIBUTION

A. Information on developments and measures taken to implement each of the recommendations addressed to your Member State in the 2025 Rule of Law Report.

I. Justice System

II. Anti-Corruption Framework

1st Recommendation: “Continue efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption”.

1. “Single Digital Registry for Monitoring Corruption Cases”

2. The Office for the Collection and Processing of Judicial Statistics (JustStat)

2nd Recommendation: Improve the lobbying framework, including by reviewing the definition of a lobbyist and ensuring effective implementation.

III. Media Pluralism and Media Freedom

3rd Recommendation: Continue ongoing efforts to strengthen legislative and non-legislative safeguards to improve the safety and protection of journalists, in particular as regards abusive lawsuits, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists.

1. Transposition of the Anti-SLAPP Directive (EU) 2024/1069 into National Law:

2. Recent Developments on Journalist Safety and Media Support:

IV. Other institutional issues related to check and balances

4th Recommendation: Develop a regular and sustained structured dialogue with civil society organisations, and simplify registration requirements for civil society organisations in view of maintaining an open framework for them to operate.

1. Ministry of Migration and Asylum (MOMA)

2. Ministry of Interior

B. Information on a) developments that are relevant for updating and following up on the assessment of the topics covered in 2025 Report and b) any other new developments.

I. Justice System

(A) Independence

1. Appointment and selection of judges, prosecutors and court presidents (incl. judicial review) / Promotion of judges and prosecutors/ Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e.g. Council for the Judiciary) /Independence/autonomy of the prosecution service.

a. Constitutional Guarantees of Independence and Self-Governance of the Judiciary

2. Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)

a. Inspection and Disciplinary Oversight of Judges and Prosecutors

b. Judicial Supervision

c. State Liability for judicial decisions

3. Irremovability of judges; including transfers (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review)

a. Locality Restrictions on Judicial Officers.

b. Recusal of judicial officers.

c. Service of documents to judicial officers.

d. Post-retirement regime.

4. Allocation of cases in courts

a. Article 150 of Law 5221/2025: Maximum Case Allocation Limits for Judicial Officers

5. Independence of the Bar (chamber/association of lawyers) and of lawyers

a. Election of the Bar Associations

b. Transfer of judicial subject matter to lawyers

c. Reform of the Lawyers' Code

6. Significant developments capable of affecting the perception that the general public has of the independence of the judiciary

a. Justice system reforms: Enhancing Efficiency and Trust in the Greek Judiciary

b. Child-Friendly Justice

c. Judicial initiatives to strengthen public trust in the justice system

(B) Quality of justice

1. Geographical distribution and number of courts/jurisdictions ("judicial map") and their specialisation, in particular specific courts or chambers within courts to deal with fraud and corruption cases.

a. Reform of the Judicial Map of Civil and Criminal Justice (Law 5108/2024) -

i. Preliminary data after of implementation of the Judicial Map.

ii. Amendments to the Code of Civil Procedure (Law 5221/2025)

iii. Implementation progress in the two largest Courts of First Instance.

b. Council of State

c. Administrative Courts

d. Economic Crime Prosecutor's Office

2. Digitalisation / Use of assessment tools and standards.

a. Digital Transformation of Justice

- b. Use of Artificial Intelligence
- c. Additional Digital Initiatives
- d. Training of justice professionals

3. Resources of the judiciary (human/financial/material), remuneration/ bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year).

- a. Judges and Prosecutors
- b. Judicial Clerks
- c. Upgrading of the Ministry of Justice Building Infrastructure.

4. Specialisation (of judges/specific courts/chambers within courts) and training for the judiciary to deal with commercial cases, as well as alternative dispute resolution mechanisms and mediation as regards commercial cases.

- a. Specialisation of Judges and Courts:
- b. Alternative dispute resolution mechanisms
- c. Special Secretariat for Alternative Dispute Resolution (ADR) – Ministry of Justice
- d. Land Registry Mediation (Article 59, Law 5197/2025)

5. Accessibility of courts (e.g. court/legal fees, legal aid, language)

- a. Council of State
- b. Civil and Criminal Justice- Supreme Court of Areios Pagos.
- c. Court of Audit

6. Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)-

- a. National School of the Judiciary: Recent reforms by Law 5197/2025
- b. Selection, Education and Training of Judges, Prosecutors, and Judicial Clerks
- c. Continuous Training of Judges and Prosecutors and International Activities
- d. Funding of the National School of the Judiciary
- e. Memoranda of Understanding and National Cooperation

(C) Efficiency of the justice system:

1. Key Innovations of the new Code of Civil Procedure are the following:
2. Transfer of Cases to Lawyers (Laws 5095/2024 and 5221/2025)
3. Transfer of Cases to Notaries: General Register of Wills (Law 5221/2025)
4. Criminal Justice:
 - i. Law 5187/2025 on electronic monitoring
 - ii. Art. 58 Law 5197/2025: Prosecutorial Oversight of Restrictive Measures:
 - iii. Art. 54 Law 5197/2025 – Independent Offices for the Protection of Minor Victims
5. Reorganization of Forensic Services (Law 5172/2025):
6. Court of Audit
7. Law 5172/2025: Addressing New Forms of Violence Against Women – Transposition of Directive (EU) 2024/1385 – Additional Measures on Domestic Violence – Strengthening Eurojust Operations – Measures for the Protection of Minors and the Fight Against Criminality.
8. TSI: "Backlog Reduction Tool" in Courts of First Instance of Athens and Thessaloniki

Next steps:

1. Proposed Legislative Amendments to the draft Law“Establishment and operation of a Unified Digital Register for Monitoring Corruption Cases...).
2. Reform of Inheritance Law.
3. Reform of the Legal Framework Governing Judicial Guardianship.

II. Anti-corruption framework

A. The institutional framework capacity to fight against corruption (prevention and investigation / prosecution)

1. List any changes as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention, detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical/specialised resources as relevant), including the cooperation among domestic and with foreign authorities. Indicate any relevant measures taken to effectively and timely cooperate with OLAF and EPPO.

- a. The 2026 recruitment plan concerning auditing and supervisory independent authorities*
- b. National Transparency Authority (NTA):*
- c. The Independent Authority for Public Revenue (IAPR)*

2. Safeguards for the functional independence of the authorities tasked with the prevention and detection of corruption.

- a. NTA's independence*
- b. Public Prosecutor for Economic Crime*

3. Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators.

- a. Update on the National Anti-Corruption Action Plan (NACAP)*
- b. Mol initiative: Working groups for simplification of administrative procedures - "Mitos"*

B. Prevention

1. Measures to enhance integrity in the public sector in particular as regards high-level officials (including as regards incompatibility rules, revolving doors, codes of conduct, ethics)

- a. The Codes of Conduct*
- b. Update on the operation of Ethics Committee within National Transparency Authority.*
- c. Standard Operating Regulation for the Audit Committee of Higher Education Institutions (HEIs)*
- d. Operating Regulation for Audit Committee of the Independent Authorities*
- e. Internal Audit*
- f. Internal Audit Platform*
- g. Certification Schemes on Integrity, Internal Audit and Risk Management*

2. Measures to enhance general transparency of public decision-making (including rules on lobbying, asset and interest disclosure rules, gifts policy, transparency of political party financing).

- a. Lobbying*
- b. The Central Audit Committee and the declarations of assets:*
- c. Audits conducted by the Asset Declarations Audit Department (Inspections and Audits Unit/NTA)*
- d. Gifts policy*
- e. Initiative of the Mol to implement Regulation (EU) 2024/900 on political advertising*
- f. Presidential Decree 15/2022 on the financing of political parties.*

3. Measures to prevent conflicts of interest in the public sector. Please specify the features and scope of their application (e.g. categories of officials concerned, types of checks and corrective measures depending on the category of officials concerned).

→ For the three previous points, please also provide information and figures on their application/enforcement, such as number of detected breaches/irregularities of the various rules in place and the follow-up given (investigations, sanctions, etc.).

- a. Regarding the measures to prevent conflicts of interest in the public sector.*
- b. Ethics Committee*

4. Measures to ensure whistleblower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given).

- a. Legal Framework for Whistleblower Protection in Greece
- b. The Integrity Advisor
- c. Law 5193/2025 for the implementation of Reg (EU) 2023/1114 on markets in crypto assets
- d. Transportation of Dir. (EU)2024/1226 on infringing Union restrictive measures-L. 5232/2025
- e. Code of Ethics
- f. Data on the number of reports

5. Specific measures to enhance transparency, integrity and accountability in sectors with high risks of corruption, with a view to monitor and prevent corruption and conflict of interests, and where applicable measures to prevent and address corruption committed by organised crime groups.

- a. Public Procurement – The Law 5218/2025
- b. Other measures and initiatives on public procurement:
- c. HCC: Strengthening Judicial Capacity Against Bid Rigging in Public Procurement
- d. Uniform Local Government Code
- e. Extension of the scope of Law 5026/2023 - Article 49 of Law 5193/2025:
- f. Implementation of Regulation (EU) 2023/1114 on markets in crypto assets - Law 5193/2025:
- g. Transportation of Directive (EU) 2024/1226 - Law 5232/2025:
- h. The operation of the Court of Audit

6. Measures for the prevention of corruption in relation to the issuing of official permits (e.g. related to environment, energy, service provision and various types of construction)

- a. Public Procurement – The Law 5218/2025
- b. Ministry of Infrastructure and Transport
- c. Overall Assessment

C. Repression

1.The legal framework on the criminalisation and sanctions for corruption and related offences, including foreign bribery

- a. Reform of the Disciplinary Law for Civil Servants - The new disciplinary Law 5225/2025
- b. Establishment of the Police Directorate for Ethics and Internal Audit (Law 5187/2025)
- c. The Certified Training “e-peitharxika” – Transparency in disciplinary law and procedures:

2. Official data on the number of investigations, prosecutions, final judgments, and the application of sanctions for corruption offences (differentiated by offence if possible). Please indicate whether the cases: involve legal persons; are related to the implementation of EU or national funds; involve high level corruption. Please indicate which data is publicly available and how policy-making is informed by the data.

- a. Statistics on corruption, including high level corruption.
- b. Statistics of the Court of Audit:
- c. Statistics and Operation of the Central Audit Committee (CAC) in 2025:
- d. Statistics of NTA’s latest annual report (issued in 08.2025)
- e. Statistics on disciplinary cases of the electronic database 'e-Peitharxika':
- f. Statistics of Internal Affairs Service of the Security Forces (I.A.S.S.F.):

Cross-pillar elements: cross-border rule of law issues related to the Single Market

If you are aware of any significant challenges concerning the Single Market faced by businesses or citizens from your Member State in a cross-border context relating to any of the four pillars of the report, including for example issues with market access and the conditions for economic activities...

- a. Digital RRF projects:
- b. As far as it concerns ILIMS:
- c. Raising awareness:
- d. HCC Strengthens Rule of Law through Judicial Training on Digital Competition Law
- e. HCC Contributes to the Rule of Law Dialogue – Intervention at the NSJ

III. Media Pluralism and Media Freedom

A. Media authorities and bodies.

1. Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies.

a. Update on measures taken to ensure the independence, enforcement powers and adequacy of resources of NCRTV

i. Legal framework – The Law 5253/2025:

ii. Human resources - Employment of new staff

iii. Financial resources

2. *Conditions and procedures for the appointment and dismissal of the head / members of the collegiate body of media regulatory authorities and bodies.*

Update regarding the cases challenging the legality of the composition of NRCTV pending before the Council of State

3. *Existence and functions of media councils or other self-regulatory bodies*

Independent self-regulation – The Hellenic Media Council (art. 37 of Law 5253/2025):

B. Safeguards against government or political interference and transparency and concentration of media ownership

1. *Measures taken to ensure the fair and transparent allocation of state advertising*

a. New legal framework ensures full state advertising transparency (Law 5253/2025).

b. Update on the operation of other instruments in the field of transparency in state advertising

2. *Safeguards against state / political interference, in particular:*

- *safeguards to ensure editorial independence of media (private and public)*

a. New legal framework – Art. 28 of Law 5253/2025

- *Specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal), safeguards for their financial and operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions*

a. The new legal framework of Law 5253/2025

b. Article 14 of Law 5253/2025 on the control and supervision of ERT S.A.

c. Specific safeguards introduced and still in force

- *information on specific legal provisions and procedures applying to media service providers, including as regards granting/renewal/termination of licences, company operation, capital entry requirements, concentration, and corporate governance*

a. The extension of licensing deadlines for regional television and radio stations.

b. The draft laws on licensing:

3. *Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners*

a. The continuous and effective operation of the electronic MET and MHT Registries

b. Law 5212/2025: upgrading the implementation of the electronic Registries MET and MHT

c. The new provisions on the transparency – Laws 5212/2025 and 5005/2002:

d. The continuous operation of the Committee of Deontology of Article 25 of Law 5005/2022:

e. Radio, television, new audio-visual media services:

C. Framework for journalists' protection, transparency and access to documents

1. Rules and practices guaranteeing journalist's independence and safety, including as regards protection of journalistic sources and communications, referring also, if applicable, to follow-up given to alerts lodged with the Council of Europe's Platform to promote the protection of journalism and safety of journalists.

- a. The Memorandum of Understanding is still in force
- b. The Task Force is continuing its work
- c. Trainings organised by the ICSJ
- d. International Conferences by the ICSJ
- e. Council of Europe Platform to promote the protection of journalism and the safety of journalists:
- f. Council of Europe "Journalists Matter" Campaign
- g. The Collective Labor Agreement
- h. The contribution of the Hellenic Police

2. Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists.

- a. The participation of the Hellenic Police in the Task Force:
- b. The National Plan for the Management of Open-Air Public Assemblies still in force:
- c. The study program of the Hellenic Police Academy and the new course:

3. Access to information and public documents by public at large and journalists (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information).

4. Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits.

- a. Protective legal framework at safeguarding journalism and freedom of expression.
- b. Recent developments.

Other – please specify

1. Media Literacy initiatives – fight against disinformation:
2. «Cultivating Critical Readers» – A new pilot program on Media Literacy:
3. Conferences on Media Literacy/Disinformation:
4. MedDMO Workshop:
5. Participation in the CE's "RESIST" project to strengthen resilience to disinformation:
6. Meeting on "Strengthening Social Resilience against Disinformation":
7. Memoranda of Cooperation:
8. Synergy with the Training Institute (INEP) of the National Center for Public Administration
9. Paris Declaration on Multilateral Action for Information Integrity and Independent Media
10. Organization of a Forum on Public Discourse in Democracy and the Public Sphere, Digital Security
11. OSCE RFoM Amb. Jan Braathu's Visit to Greece

IV. Other institutional issues related to check and balances

A. The process for preparing, enacting and implementing laws

1. Framework, policy and use of impact assessments and evidence-based policy-making, stakeholders'/public consultations (including rules and practices on the transparent participation of civil society to policy development and decision-making processes, and transparency and quality of the legislative process in the preparatory, the parliamentary and implementation phase (including guidance on how to implement legislation).

- a. Public consultation:*
- b. Participation of stakeholders and the civil society in the law-making process.*
- c. Codification of legislation.*
- d. Accessibility, drafting practices and digital tools.*
- e. The Legislative Quality Index 2024*
- f. The transposition of EU directives into national law.*

2. Rules and use of fast-track procedures and emergency procedures (for example, the percentage of decisions adopted through emergency/urgent procedure compared to the total number of adopted decisions)

- a. Urgent and super-urgent legislative procedures.*
- b. Parliamentary amendments.*
- c. Last-minute amendments.*

3. Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.

- a. Legal certainty and stability*
- b. Additionally on the non-discrimination factor:*

4. Rules and application of states of emergency (or analogous regimes), including judicial review and parliamentary oversight.

Emergency legislation:

5. Regime for constitutional review of laws

- a. The diffuse nature of constitutional review of laws*
- b. The Court of art. 100 of the Constitution*
- c. The “pilot” case process*
- d. The advisory function of the Council of State*

B. Independent authorities

1. Independence, resources, capacity and powers (including effective access to relevant data) of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions

2. Safeguards to ensure the effective independence of supervisory and regulatory authorities with a direct impact on economic operators such as national economic oversight, enforcement and competition authorities.

C. Accessibility and judicial review of administrative decisions

1. Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data) and respect of the good administration principle (including the obligation of the administration to give reasons for decisions)

2. Judicial review of administrative decisions: short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or

derogations from the general regime of judicial review)

3. Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies (e.g. administrative review)

4. Rules and practices related to the application by all courts, including constitutional jurisdictions, of the preliminary ruling procedure (Art. 267 TFEU)

- a. Request for a preliminary ruling to the CJEU:
- b. Important case law concerning the rule of law:

5. Implementation of final judgments by the public administration and State institutions and follow-up given to supranational judgments, including decisions from the European Court of Human Rights, as well as available remedies in case of non-implementation

- a. Compliance of the Administration with court decisions –Legal framework
- b. Implementation of the European Court of Human Rights judgments
 - i. The Special Permanent Committee of the Hellenic Parliament for Monitoring ECHR Judgments.
 - ii. Statistical data for the period from 1-1-2025 to 23-12-2025:
 - iii. General measures of compliance with ECtHR judgments
 - iv. Legal remedy for raising complaints regarding non-execution of the ECtHR's judgments:

6. Oversight, including by courts, of the use of intrusive surveillance software by national authorities

Relevant Targeted question: Updates regarding the ongoing judicial proceedings into the allegations of the use of spyware and any other relevant development, including the adoption of the presidential decree foreseen in Article 13 of Law 5002/2022.

D. The enabling framework for civil society

1. Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration, transparency and dissolution rules)

A. Ministry of Interior

- a. Statistical data on the implementation of Law 4873/2021
- b. The legal framework - Amendments to Law 4873/2021 by Law 5270/2026
- c. The Joint Ministerial Decisions no 13359 (GG B 4600) and no 16884 and the relevant circulars.
- d. Other initiative and actions of the Ministry of Interior.

B. Ministry of Migration and Asylum.

- a. Obligation to Register in the Registry of Greek and Foreign NGOs and the Members' Registry
- b. Simplification of Supporting Documents for Registration in the NGO Registry
- c. Interoperability of the NGO Registries of the MoMA and Mol
- d. Programme Agreements of the Ministry of Migration and Asylum
- e. Composition of the Independent Appeals Committees of the Appeals Authority of the Moma
- f. Coordination Committee for Migration Policy and Social Integration

2. Rules and practices having an impact on the effective operation and safety of civil society organisations and human rights defenders. This includes measures to protect them from attacks – verbal, physical or on-line –, intimidation, legal threats incl. SLAPPs, negative narratives or smear campaigns, measures capable of affecting the public perception of civil society organisations, etc. It also includes measures to monitor threats or attacks and dedicated support services, as well as available remedies.

3. Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding)

E. Initiatives to foster a rule of law culture

- a. Ministry of Education, Religious Affairs and Sports
- b. Visits to the Hellenic Parliament
- c. The “Parliament of Youth: Steps of Democracy – Putting Participation into Practice”
- d. National Strategy for Media Literacy
- e. Speeches and lectures in schools on preventing, investigating, and prosecuting cybercrime.

F. Targeted question: Update on the follow-up to the Pylos shipwreck (ongoing criminal proceedings and possible administrative/disciplinary proceedings/ follow-up to the Ombudsperson report).

G. Targeted question: Information on the application of Article 31 of Law 5119/2024 (restrictions on the recording and transmission of court proceedings), if any.

E. Targeted question: Any updates/developments regarding the issue of immunities of members of Government, including on the efforts reported in the 2025 Report to ensure that the judiciary is more involved.

Other – please specify:

The National Strategy for the Protection of Minors from Internet Addiction:

ANNEX I: JUDICIALS STATISTICS

ANNEX II: NATIONAL SCHOOL OF JUDICIARY

ANNEX III: ANTI-CORRUPTION FRAMEWORK

ANNEX IV: JUDICIALS STATISTICS ON PRESS AND MEDIA

A. Information on developments and measures taken to implement each of the recommendations addressed to your Member State in the 2025 Rule of Law Report.

I. Justice Systems

There were no recommendations in the 2025 report regarding the justice system.

II. Anti-Corruption Framework

1st Recommendation: “Continue efforts to establish a robust track record of prosecutions and final judgments in corruption cases, including high-level corruption”.

1. “Single Digital Registry for Monitoring Corruption Cases”

Following the recommendation to “establish a reliable track record of investigations and final judgments in corruption cases, including high-level corruption cases,” the Ministry of Justice established a Working Group (Ministerial Decision 4004/08-07-2025, ADA: 9ΣΤ7Ω-ΡΑΩ) with the objective of creating a Digital Registry for the monitoring of corruption cases. The Working Group included all key authorities involved in combating corruption, such as the Economic Crime Prosecutor’s Office, the Ministry of Citizen Protection (Hellenic Police – Internal Affairs Directorate), the National Transparency Authority, the Independent Authority for Public Revenue, and other competent bodies.

Following a series of meetings and consultations with all competent authorities (including the Ministry of Interior, the Ministry of Digital Governance, the Anti-Money Laundering Authority, among others), the Working Group finalized a draft law, which has already been submitted to public consultation (<https://www.opengov.gr/ministryofjustice/?p=18064>). The purpose is to establish and operate a comprehensive electronic database for the registration, updating, and monitoring of corruption cases, covering all procedural stages—from the initial investigation to the issuance of a final and irrevocable judicial decision or the final termination of proceedings.

More specifically, the Registry will function as a single nationwide digital system of structured data and information on corruption cases, ensuring real-time updates and interoperability among all competent authorities. Cases will be recorded on the basis of a predefined list of corruption offenses covering the full spectrum of Greek criminal legislation (Criminal Code and special criminal laws), as well as relevant international conventions and instruments.

Indicatively, the Registry will include offenses such as: bribery and corruption of political officials, judges, public officials, and private-sector actors; forgery affecting the State or the financial interests of the European Union; obstruction of justice; trading in influence and intermediaries; abuse of power; false certification; embezzlement, fraud, subsidy fraud, and breach of trust against the State or the EU’s financial interests; money laundering; liability of legal persons for bribery-related offenses.

In addition, the law introduces a “general corruption offense” category, allowing the registration of conduct that exhibits corruption-related characteristics even if it does not fall strictly within a defined offense. This ensures that suspicious conduct is monitored and does not escape scrutiny.

To safeguard objectivity, uniformity, and independence in data entry, only certified officials from judicial, prosecutorial, law enforcement, and independent authorities will be authorised to update the Registry. A strict anonymisation framework is established in line with applicable data protection legislation, ensuring procedural confidentiality and the protection of sensitive personal data. Each case will receive a unique identification code, without recording personal or qualitative data.

Oversight of the Registry’s operation is entrusted to a three-member committee of the Ministry of Justice, chaired by a senior prosecutorial official—specifically, the Economic Crime Prosecutor—in order to guarantee institutional safeguards, independence, confidentiality and respect for the rights of all persons involved.

The law also provides for the preparation of an annual report, published on the Ministry of Justice’s website and submitted to the Special Standing Committee on Institutions and Transparency of the Hellenic Parliament, ensuring full transparency and continuous evaluation of the Registry’s effectiveness.

The objectives of the new framework are not limited to compliance with international recommendations (Rule of Law Reports, OECD evaluations), but also include enhancing transparency and public trust in institutions

and the Rule of Law, through the objective and reliable collection of statistical data by independent authorities.

Specifically, the Digital Registry will enable:

- Accurate recording and systematic monitoring of corruption cases from investigation to final judgment;
- Collection and production of reliable statistical data;
- Extraction of evidence-based conclusions for improving the institutional framework and addressing operational shortcomings.

Following the adoption of the law, the necessary secondary legislation will be issued, and a public procurement procedure will be launched for the selection of a contractor. The objective is for the Digital Registry to become operational within 2026.

Finally, it should be emphasised that the contribution, guidance, and technical expertise of the European Commission have been crucial to this effort. In the context of good cooperation practices, three working meetings have already taken place with the competent Commission policy officers:

-14 October 2025, an in-person Interministerial meeting at the Ministry of Justice on progress across all recommendations;

-20 November 2025, an online technical meeting providing EU expertise for the development of the Digital Registry;

-18 December 2025, a further technical meeting presenting the EU's corresponding registry for monitoring corruption and organised crime.

In light of these developments, Greece considers that it has demonstrated substantial progress and full compliance with the relevant EU recommendation.

2. The Office for the Collection and Processing of Judicial Statistics (JustStat)

In addition to the above-mentioned digital registry, the Ministry of Justice has established and still operates the Office for the Collection and Processing of Judicial Statistical Data, which is staffed with specialised personnel (statistical data analysts, statisticians, and IT specialists) and collects annual judicial statistical data, among others, on criminal prosecutions and final convictions related to corruption cases, and in particular offences such as foreign bribery, active bribery of political persons and public officials, and offences affecting the financial interests of the European Union, etc. These statistics are available and are regularly transmitted to the EU within the framework of the Rule of Law monitoring mechanism for Greece.

2nd Recommendation: Improve the lobbying framework, including by reviewing the definition of a lobbyist and ensuring effective implementation.

Law 4829/2021 introduced, for the first time in Greece, a regulatory framework for lobbying activities. Article 8 of the Law established a "Transparency Registry" as an electronic database maintained by the National Transparency Authority, which acts as the data controller in accordance with Law 4624/2019. The Registry is publicly accessible through the Single Digital Gateway of Public Administration (gov.gr), thereby enhancing transparency and public oversight.

Following the directions and proposed actions provided by the EU in the recent Rule of Law Report, and in order to strengthen this new institution and develop a related culture within institutional bodies, actions for awareness-raising and training of government members, deputy ministers, and general and special secretaries of ministries and their offices are scheduled to take place in the first half of 2026 under the framework of the "Leadership Academy" of the National Centre for Public Administration and Local Government (EKDDA), jointly with the National Transparency Authority (NTA).

In cooperation with the Ministry of Interior regarding awareness-raising, the NTA plans activities for disseminating information to institutional bodies required to submit an annual declaration. The awareness campaign (first raising awareness event) will take place in the 1st quarter of 2026, targeting members of the Council of Ministers of the competent Ministries.

The full implementation of the campaign is scheduled for the 2nd quarter of 2026.

For more information on the topic of Lobbying please refer to our contribution under Pillar II.

III. Media Pluralism and Media Freedom

3rd Recommendation: *Continue ongoing efforts to strengthen legislative and non-legislative safeguards to improve the safety and protection of journalists, in particular as regards abusive lawsuits, in line with the adopted Memorandum of Understanding and taking into account European standards on the protection of journalists.*

1. Transposition of the Anti-SLAPP Directive (EU) 2024/1069) into National Law:

Greece has committed to **transposing Directive (EU) 2024/1069 on the protection of public participation from abusive litigation (SLAPPs) by the deadline (May 2026)**. A Ministerial Decision (GG 43/21.01.2025) established a Legislative Drafting Committee, which includes senior judges, university professors, lawyers, and members of the Working Group for the Protection of Journalists. The working group has already accepted a request from representatives of journalists to participate and be heard during the group's work.

The draft law being prepared will not be limited to cross-border cases within the scope of the Directive, but will extend protection to domestic cases as well, in line with the Council of Europe's recommendation on the matter.

Furthermore, the members of the working group are actively participating in EU workshops on the proper transposition of the Directive, as well as in training programs and conferences on SLAPP organized by the Council of Europe.

2. Recent Developments on Journalist Safety and Media Support:

Since the publication of the 2025 Rule of Law Report, Greece has introduced a series of major developments in the media and journalist protection landscape. **Law 5253/2025** represents one of the most comprehensive **implementations of the European Media Freedom Act** (Regulation EU 2024/1083) at EU level, aiming to strengthen the public character and governance of ERT S.A., ensure editorial independence for all news and current affairs providers, and introduce full transparency in state advertising, including mandatory reporting and annual public disclosure. For the first time in Greek law, **the Greek Media Council was established** as an independent self-regulatory body to promote press freedom, pluralism, media literacy, fact-checking, and the fight against disinformation, marking a significant step in the institutional maturation of Greece's media ecosystem. Greece has also developed a comprehensive framework for journalist safety, including the **National Action Plan for Journalist Safety** coordinated by the General Secretariat for Communication and Information (GSCI) in consultation with journalist unions and media stakeholders, a multi-stakeholder **Task Force** to implement the plan, Anti-SLAPP measures providing recurring public funding to the POESY SLAPPs Observatory, and the **International Safety Centre for Journalists (ISCJ)** in Thessaloniki, which offers annual safety training, joint journalist-police courses, a new module on press freedom at the Police Academy, international conferences, and partnerships with OSCE, UNESCO, and the Council of Europe. In the area of **media literacy**, **Law 5253/2025** established a **three-year national strategy** to strengthen citizens' information literacy, critical thinking, and resilience against disinformation, complemented by the "Cultivating Critical Readers" programme, targeting students aged 12–18 with workshops on fake news, AI in news consumption, and personal data protection. **Law 5212/2025 amended the Print Press and Electronic Press Registries**, lowering the ownership disclosure threshold to 25%, introducing mandatory bylines, simplifying registration procedures, extending deadlines, and enhancing audits and on-site inspections. Finally, draft laws on regional television and radio licensing have been submitted, assigning supervisory authority to NCRTV/ESR, establishing licensing fees, strengthening oversight, and creating a national media ownership database in line with EMFA, with adoption and implementation expected during 2026.

For further information, please refer to the detailed presentation below, under Pillar III.

IV. Other institutional issues related to check and balances

4th Recommendation: Develop a regular and sustained structured dialogue with civil society organisations, and simplify registration requirements for civil society organisations in view of maintaining an open framework for them to operate.

Given the challenges in the registration and mapping of civil society organisations (CSOs), including fragmentation of registries and limited implementation of digital interoperability, Greece is actively advancing on the strengthening of a structured dialogue with CSOs while addressing registration and mapping challenges.

Collaboration with the European Commission provides guidance and technical expertise on best practices for structured dialogue, ensuring it is regular, long-term, and results-oriented, and helping align domestic processes with EU standards.

Greece has taken targeted measures under two complementary frameworks:

1. The Ministry of Migration and Asylum (MOMA) is focusing on NGOs operating in migration and asylum:

a. Obligation to Register in the Registry of Greek and Foreign NGOs and the Members' Registry.

Pursuant to Article 78 of Law 4939/2022, in force, in order for an NGO to participate in the implementation of actions related to international protection, migration, and social integration within the Greek territory, it must be mandatorily registered in the NGO Registry provided for under that Article. The same obligation currently applies to the registration of all members of NGOs operating in Greece in the NGO Members' Registry. Consequently, failure to register—either of the NGO itself or of its members—in the respective registries, results in a complete inability to operate within Greece.

Under the provisions of the draft law already submitted to Parliament and expected to be adopted on 4 February 2026, Article 78 is explicitly amended (see Article 56 of the draft law) so that the sole consequence of non-registration of NGOs in the NGO Registry will be the inability to receive state or EU funding and to operate within the facilities of the Ministry of Migration and Asylum, rather than a complete prohibition on operating within Greek territory, as currently applies. Registration, therefore, becomes mandatory only for NGOs that receive state or EU funding or operate within the structures of the Ministry of Migration and Asylum.

Accordingly, under the same draft law, the obligation to register members in the NGO Members' Registry will be limited only to the members of those NGOs that are registered in the NGO Registry—either because they receive state or EU funding, because they operate within the structures of the Ministry of Migration and Asylum, or because they voluntarily choose to register in order to gain direct access to funding or to the Ministry's structures.

The above provisions are the result of consultations with the competent authorities, civil society, and DG HOME and will be inserted in the draft law until its adoption by Parliament.

b. Simplification of Supporting Documents for Registration in the NGO Registry

The simplification of the supporting documents required for registration will follow the adoption of the draft law, through the issuance of an updated regulatory act, which is already under preparation and is expected to be submitted shortly.

c. Interoperability of the NGO Registries of the Ministry of Migration and Asylum and the Ministry of Interior
The tender procedure pursuant to Article 119 of Law 4412/2016 has been completed. Three (3) bids have been submitted and approved at the level of technical specifications. The process is currently at the stage of opening the financial offers for the selection of the contractor.

d. Programme Agreements of the Ministry of Migration and Asylum

With the amendment of Article 61 of Law 4609/2019 (GG A' 67), the possibility for the Ministry of Migration and Asylum to conclude programme agreements with NGOs, charitable foundations, endowments, credit institutions, and special financial organizations—namely, to proceed with direct awards to such entities—is

formally abolished. In this way, the national legal order is brought into compliance with overriding EU public procurement law (Directives 2014/24/EU and 2014/25/EU), as transposed by Law 4412/2016 (GG A' 147) on public works, supplies, and services contracts.

The Court of Audit had repeatedly ruled in favor of the non-application of the repealed provisions due to their incompatibility with EU law (indicatively, Decisions ES/Chamber Z/47/2023 and ES/Chamber Z/458/2023). It is clarified that the above entities may always participate in tendering or negotiation procedures as otherwise provided for under the applicable legislative framework.

e. Composition of the Independent Appeals Committees of the Appeals Authority of the Ministry of Migration and Asylum

The Plenary of the Council of State, by Decision No. 1150/2025 (published on 26 June 2025, with effects as of 25 June 2025), following a preliminary question submitted by the Administrative Court of First Instance of Thessaloniki (Decision No. 534/2022), ruled that the single-member composition of the Independent Appeals Committees of the Appeals Authority of the Ministry of Migration and Asylum—before which administrative appeals against decisions of the Asylum Service are brought—is unconstitutional. The draft law adapts the legislation accordingly to comply with the decision of the Plenary of the Council of State.

f. Coordination Committee for Migration Policy and Social Integration

The draft law establishes a Coordination Committee for Migration Policy and Social Integration, composed of representatives of all competent ministries and, potentially, representatives of Decentralized Administrations, local authorities, international organizations, the National Commission for Human Rights (this addition followed hearings before the competent parliamentary committee), and civil society.

The purpose of the Committee is to formulate national strategies and objectives concerning legal and irregular migration and social integration, and to coordinate the actions of the involved stakeholders.

2. The Ministry of Interior is focusing on civil society organisations more broadly, and has established a stable regulatory framework under Law 4873/2021, ensuring transparency, accountability, and operational independence.

It has created the CSO Observatory, a central platform to register CSOs, enhance public visibility, and facilitate engagement with citizens, volunteers, and funders.

The Ministry maintains an ongoing dialogue through workshops and thematic meetings and continuously reviews and updates the regulatory framework, including the law enacted on January 22, 2026 (already, Law 5270/2026, GG A 9 A/23.1.2026).

By reducing bureaucracy, enhancing digital interoperability, and institutionalising structured dialogue, Greece has strengthened both trust in civil society and the operational capacity of CSOs, supporting effective participation in public policy and broader societal engagement.

For detailed information on the matter please see the relevant output on the topic under “The enabling framework for civil society”.

B. Information on a) developments that are relevant for updating and following up on the assessment of the topics covered in 2025 Report and b) any other new developments.

I. Justice System

(A) Independence

1. Appointment and selection of judges, prosecutors and court presidents (incl. judicial review) / Promotion of judges and prosecutors/ Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e.g. Council for the Judiciary) /Independence/autonomy of the prosecution service.

a. Constitutional Guarantees of Independence and Self-Governance of the Judiciary

The fifth Section of the Greek Constitution of 1975, as revised and currently in force, is dedicated to Judicial Power.

In Greece there are three branches of Judiciary with three Supreme Courts on top. The Supreme Court of Areios Pagos – the highest court for civil and criminal justice; The Council of State – the supreme administrative court; The Court of Audit – the supreme financial court and supreme audit institution (1).

The judiciary is composed exclusively of career judges and prosecutors, who belong to a unified corps of magistrates. Their recruitment, promotion, rights, and obligations are regulated by a common legal framework.

Judges are appointed by presidential decree after passing a national entry examination and completing their training at the National School of the Judiciary.

The personal and functional independence of judges is fully protected by the Greek Constitution. Specifically:

Article 87 of the Constitution guarantees Judicial Independence. As stated in this article, Courts are composed of regular judges who enjoy both functional and personal independence. Judges are subject only to the Constitution and the laws when exercising their duties. Judicial inspections are carried out exclusively by other judges of a superior rank.

In the next **Article 88**, titled “Guarantees of judicial independence, remuneration, transfers”, the Constitution provides that: Judges are appointed by presidential decree according to criteria provided by the law; They are appointed for life, and they can only be dismissed pursuant a court judgement, only in limited cases such as a criminal conviction, serious disciplinary offense, permanent illness or disability, or professional incompetence.

Regarding judicial career, **Article 90** establishes the **Supreme Judicial Council**, which is responsible for all decisions on promotions, appointments, transfers, secondments, and reassignments of judges; The Supreme Judicial Council is composed exclusively of judges, namely the President and senior judges of the relevant Supreme Court. In this way, each of the three branches of the judiciary has its own Supreme Judicial Council. These bodies operate independently — without any interference from the executive or legislative power. Appeals against decisions of a Supreme Judicial Council can only be submitted to the

¹ **Constitutional Review in Greece- The role of Supreme Special Court under Article 100 of the Constitution:** Greece applies a system of diffuse constitutional review. All courts, regardless of their jurisdiction or level (civil, criminal, and administrative courts), are vested with the authority to review the constitutionality of statutes. Constitutional review is exercised within the context of a specific case. If a court finds that a statutory provision is unconstitutional, it declines to apply it in the particular case. Such a finding does not result in the annulment of the provision with erga omnes effect; the statute formally remains in force. The Supreme Civil and Criminal Court (Areios Pagos), the Council of State, and the Court of Audit play a central role in shaping authoritative case law. In the event of conflicting judgments between the supreme courts in matters of constitutional review, jurisdiction lies with the **Supreme Special Court under Article 100 of the Constitution**, whose decisions are binding erga omnes.

Plenary Session of the relevant Supreme Court. The decisions of both the Judicial Council and the Plenary are binding for all, including the Minister of Justice.

The sole exception to the principle of self-governance is provided in paragraph 5 of Article 90 of the Constitution: the promotion to the top positions of the judiciary — namely, the Presidents and Vice-Presidents of the Supreme Courts, the Prosecutor of the Supreme Court, the Commissioner of the Court of Audit, and the Commissioner of the Administrative Courts — is decided by the Cabinet of Ministers, from among the members of the respective Supreme Court (2).

However, **the recent legislative reform (Article 27 of Law 5123/2024, as amended by Article 36 of Law 5197/2025)** provides for the participation of the judiciary in the selection of the leadership of the judiciary (3). This reform marks a historic development in Greece by introducing, for the first time, the formal participation of the judiciary in the selection of its own leadership. It represents a major step in strengthening judicial independence and the rule of law, a development expressly recognized by the European Commission's 2024 Rule of Law Report as fully implementing the relevant recommendation. The reform has been broadly welcomed at the national level by judges of all supreme courts, judicial and bar associations, and civil society. As a result, judicial self-governance in Greece has been further consolidated: decisions concerning judges' careers are taken exclusively by judicial bodies, while the leadership of the highest courts is now appointed with the formal involvement of judges themselves. Regarding **disciplinary authority** over judges, **Article 91** of the Constitution provides that such authority is exercised by disciplinary bodies composed of senior and supreme judicial officers. Disciplinary powers are exercised in accordance with the provisions of the Constitution and the Code on the Organization

² **The Council of State** has stated that this exception to the principle of the judicial self-governance is justified by the principle of democratic legitimacy. The reasoning is that the Cabinet of Ministers, which enjoys the confidence of Parliament (as required under Article 84 of the Constitution), possesses the necessary democratic legitimacy to make such appointments. For this reason, it has also been accepted that the Cabinet's decisions in this context do not require justification.

³ **Article 27 of Law 5123/2024**, as amended by Law 5197/2025, grants the Plenary Sessions of the Supreme Courts—composed exclusively of senior judges the right to issue a **non-binding opinion** on the selection of their leadership. This arrangement complies with European standards and does not conflict with Article 90(5) of the Constitution, which grants broad discretion to the Council of Ministers.

Article 36 of Law 5197/2025: Following proposals by the Administrative Plenary Sessions of the Council of State, the Supreme Court (Areios Pagos), and the Public Prosecutor's Office at the Court of Cassation [see Decision No. 47/2024 of the Council of State (Plenary Session and Council), Decision No. 53/2024 of the Plenary Session of the Court of Cassation (in Council), and Decision—Minutes No. 2/2025 of the Public Prosecutor's Office at the Court of Cassation], in May 2025 Parliament adopted article 36 of Law 5197/2025, further amending the framework governing, for the first time, the involvement of the Administrative Plenary Sessions of the highest courts in the appointment procedure of their Presidents and Vice-Presidents, in view of the initial implementation of the new appointment procedure. This provision regulates the voting process and introduces additional limitations on the pool of candidates based on seniority, as well as a minimum number of votes that may be cast by each judge for each position to be filled (President and Vice-Presidents). The new provision seeks to improve the reform introduced by Law 5123/2024, with the aim of ensuring the expression of a clear and uninfluenced opinion by the judiciary regarding the selection of its leadership, in accordance with the requirements of the rule of law, while avoiding potential risks of disruption to relations among members of the courts.

Regarding **Court of Audit**, by virtue of (normative) Decision FG8/11729/26.2.2025 of the Court's Plenum "Rules of Procedure applicable to the judicial formations of the Hellenic Court of Audit" (GG B' 1866/15.4.2025), the respective Rules previously in force were modified and new provisions were added concerning, inter alia, the procedure for the delivery of the Plenum's Opinion on the appointment of the Court's President, Vice-Presidents and Deputy Advocate General.

In addition, the same provision (art. 36 of Law 5197/2025) **expanded judicial participation** to the selection of the General Commissioner of the State for Administrative Courts, by establishing a new advisory body composed of judges from the General Commission and the 50 most senior presidents of the administrative Courts of Appeal, which will issue a non-binding opinion.

The procedure was recently applied to vacancies arising **on 30 June 2025** for the positions of President of the Supreme Court of Areios Pagos, Prosecutor General of Areios Pagos, and Vice-Presidents of the three supreme courts.

of Courts and the Status of Judicial Officers, with the aim of safeguarding judicial independence and ensuring the proper and orderly functioning of the judiciary.

From the foregoing, it is evident that the Greek Constitution affords a high level of protection to judicial independence and the self-governance, as all decisions affecting judges' careers and professional evolution are taken exclusively by bodies composed of judges

2. Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)

a. Inspection and Disciplinary Oversight of Judges and Prosecutors

As noted above, the Constitution safeguards judicial independence by ensuring that judicial inspections under Article 87 are carried out exclusively by judges of a superior rank, while disciplinary authority under Article 91 is exercised by bodies composed of senior and supreme judicial officers. Together, these provisions ensure that oversight and accountability mechanisms operate within the judiciary itself, protecting judges from external interference while maintaining the proper functioning and integrity of the judicial system.

It should be emphasised that the assessment of a judge's decisions—whether concerning the interpretation of law, the evaluation of facts, or the application of legal rules—cannot, by itself, constitute a disciplinary offence. This principle is codified in Article 109 of Law 4938/2022, which governs the conduct and inspection of judicial officers.

Disciplinary proceedings may exceptionally be initiated only in cases where a judge's acts or omissions, although carried out within the scope of adjudication, do not reflect genuine judicial decision-making—for example, when motivated by bad faith or extreme negligence. Importantly, as noted above, the bodies competent to exercise disciplinary authority are themselves composed of judges, thereby safeguarding impartiality and judicial self-governance.

These constitutional and statutory safeguards are fully aligned with European standards on judicial independence, including the criteria established by the Court of Justice of the European Union (Grand Chamber, 15 July 2021, C-791/19, *European Commission v. Republic of Poland*), and are consistent with Article 19(1) of the Treaty on European Union, which permits disciplinary liability of judges only in strictly exceptional circumstances arising from judicial decisions (4).

b. Judicial Supervision

Article 23 of Law 4938/2022 establishes the framework for judicial supervision. Specifically, the President of the Council of State oversees all administrative courts nationwide and their registries. The President of the Supreme Civil and Criminal Court (Areios Pagos) exercises supervision over all civil and criminal courts and their registries, while the Prosecutor General of the Areios Pagos supervises prosecution offices throughout the country and their registries. In addition, the General Commissioner of the Council of State for the regular administrative courts exercises supervisory authority over those courts and their registries.

As expressly stated in the law, supervision is strictly limited to oversight and the issuance of general instructions aimed at ensuring the proper, orderly, and efficient functioning of judicial and prosecutorial services. Any exceeding of this boundary is explicitly prohibited. Pursuant to paragraph 3 of the same article, any instruction, recommendation, or suggestion addressed to a judicial officer concerning substantive or procedural matters in a specific case or in a category of cases is impermissible and constitutes a disciplinary offence.

c. State Liability for judicial decisions

As stated in last year's contribution, the current legal framework provides for State liability for judicial decisions as follows:

- a. Compensation for unlawful detention or conviction (Article 7(4) of the Constitution);
- b. Actions against judges for fraud, gross negligence, or denial of justice (Article 99 of the Constitution);
- c. Liability for national court judgments that flagrantly violate EU law (Council of State 799/2021).

⁴ See also Act/Decision 54/2025 of the President of the Council for the Inspection of the Administrative Courts (www.adjustice.gr)

It should also be noted that, following the ECHR judgment in *Zouboulidis v. Greece* (Application No. 57246/21)—in which the Court held that the absence of specific legislation enabling individuals to seek compensation against the State for manifest judicial errors violates Article 6 of the Convention—Mr. Zouboulidis application to reopen his case under Article 69A of Presidential Decree 18/1989 was heard by the Plenary Session of the Council of State in October 2025. The judgment is currently pending. Moreover, in compliance with this ECHR ruling, a special legislative committee⁵ was established within the Ministry of Justice to draft legislation on the civil liability of the State for acts or omissions of judicial organs. The Committee has completed its work and submitted an initial draft, which is currently under review by the Ministry, with a view to finalizing the bill in the coming months. The draft aims to ensure fair redress and compensation for affected parties without compromising judicial independence or the effective functioning of the judiciary.

3. Irremovability of judges; including transfers (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review)

a. Locality Restrictions on Judicial Officers.

Article 35 of Law 5197/2025 amends Article 49 para. 6 of the Code of the Organisation of Courts and the Status of Judicial Officers and provides that service of a judicial officer at a Court of First Instance or a Public Prosecutor's Office at a Court of First Instance, a Court of Appeal or a Public Prosecutor's Office at a Court of Appeal shall not be permitted where the judicial officer's spouse, registered partner or a relative up to the second degree by blood or by marriage is appointed as a lawyer and is registered with a Bar Association falling within the corresponding local jurisdiction, for the duration of the marriage or registered partnership. This restriction does not apply to the courts of major Greek cities, namely Athens, Piraeus, Thessaloniki, Patras and Larissa. The relevant provision enters into force on 16 September 2025.

b. Recusal of judicial officers.

Recusal request prior to the initiation of criminal prosecution.

Under the provision of **Article 16(1) of Law 5232/2025**, Article 16 of the Code of Criminal Procedure (CCP) regarding the recusal of judicial officers is amended. It is explicitly provided that the right to submit a recusal request covers the pre-trial procedural stage, and the latest deadline for submitting such a request is set at ten (10) days prior to the scheduled hearing date before the competent misdemeanor court.

Furthermore, paragraph 2 of the same article amends paragraph 1 of Article 21 of the CCP concerning the decision on a recusal request. Specifically, it establishes the automatic invalidity of acts performed or participated in by a judicial officer who has been successfully recused, unless the court or judicial council decides otherwise due to the impossibility of reverting the case to an earlier procedural stage or repeating the acts.

c. Service of documents to judicial officers.

Article 39 of Law 5197/2025 introduces Article 126A to the Code of Organisation of Courts and the Status of Judicial Officers (Law 4938/2022, A' 109), enabling documents to be served electronically to judicial officers at their official email addresses, provided the documents carry an advanced electronic signature under EU Regulation 910/2014. Electronic acknowledgment of receipt is considered equivalent to a service report. If no acknowledgment is received within 48 hours, the text message notification is resent. Five working days after the second notification, the service is legally effective.

d. Post-retirement regime.

The Government is still reflecting on a legislative framework to allow post-retirement activities for judges based on objective, transparent criteria.

In numerous instances, members of the Supreme Court of Areios Pagos and of the Council of State have

⁵ GG 1330/Y.O.O.D.D./29-11-2024, as amended by GG 1394/Y.O.D.D./19-12-2024.

expressed the view that the existing guarantees of judicial independence, together with the high ethical standards intrinsic to judicial office, are beyond dispute. Accordingly, judges are deemed fully capable of assuming high positions of responsibility that demand personal independence and impartiality immediately following their retirement, owing to their distinguished reputation, high qualification and the entrenched safeguards of independence by which they are governed. Moreover, the recent legislative amendment providing for judges' participation in the selection of their leadership has further reinforced this independence. In view of the above, the introduction of a suspension (cooling-off) period is not considered necessary in this respect.

However, given that the level of perceived judicial independence in Greece remains low—particularly among the general public—and that restoring public trust in the judiciary continues to be a priority, the Administrative Plenary of the Council of State, in the context of discussions ahead of the forthcoming constitutional revision, is considering the possibility of extending the incompatibility rules applicable to sitting judges to retired judges for a period of two years, as a potential measure to restore public confidence in the judiciary.

4. Allocation of cases in courts

a. Article 150 of Law 5221/2025: Maximum Case Allocation Limits for Judicial and Prosecutorial Officers

By art. 150 of Law 5221/2025 (A' 133), article 19(5)(b) of the Code of Organization of Courts and Status of Judicial Officers (Law 4938/2022) is amended to regulate case allocation and ensure a balanced workload among judges and prosecutors, based on the seriousness and complexity of each case. A maximum number of case files is now set for each judicial or prosecutorial officer, not exceeding 20% above the limit established in the relevant regulations.

For civil court judges, the limits are 150 cases per year at first instance and 70 cases per year at the appellate level. Dismissals under Articles 227 and 237 of the Code of Civil Procedure are included in the calculation. The presiding officer of the Three-Member Directorate Council or court president must respect these limits when preparing case lists. In the event of extraordinary workload, the Supreme Court is informed so that additional support can be provided to maintain compliance.

Overall, this reform aims to ensure fair case allocation, prevent overload of judicial officers, and address structural inefficiencies, including understaffing, which contribute to case backlogs and reduce the effectiveness of the justice system.

5. Independence of the Bar (chamber/association of lawyers) and of lawyers

a. Election of the Bar Associations

The elections for the appointment of the Presidents and the members of the Administrative Boards of the country's 63 Bar Associations were duly conducted on the last Sunday of November 2025 (30 November 2025), in accordance with Article 107 of the Lawyers' Code (Law 4194/2013). In the three largest associations - Athens, Thessaloniki and Piraeus - the procedure was extended to Monday, 1 December 2025, as the number of members and the increased level of participation made a second day of voting necessary.

Fifty-one presidents were elected in the first round, while in nine Bar Associations runoff elections were held on Sunday and Monday, 7 and 8 December. At the Athens Bar Association, a total of 13,818 lawyers voted in the first round (turnout: 55.95%) and 10,030 lawyers in the second round (turnout: 40.61%). These figures represent an increase compared to the 2021 elections, when 12,788 lawyers voted in the first round (turnout: 54.66%) and 8,084 lawyers in the second round (turnout: 34.55%).

b. Transfer of judicial subject matter to lawyers:

The State's trust in lawyers as co-operators of the justice system and in their institutional independence is demonstrated in practice through recent legislation, by which judicial subject matter is transferred from the courts to lawyers. In particular, under Law 5095/2024 (GG A' 40), a significant number of cases falling within non-contentious jurisdiction have been entrusted to lawyers, while Law 5221/2025 (A' 133), as amended and in force, further expands this transfer by providing that, as of 1 May 2026, payment orders and orders for the delivery of leased premises will be issued by lawyers acting through the Plenary of the Bar Associations, thereby accelerating the administration of justice and relieving the

civil courts of a substantial caseload.

[For further information and statistical data regarding the transfer of judicial subject matter to lawyers, please refer below under “Efficiency”).

c. Reform of the Lawyers’ Code:

As noted in our contribution of last year, a working group was established within the Ministry of Justice, composed of judges, lawyers, notaries, and judicial officers, with the task of reforming the Lawyers’ Code.

The main pillars of the reform include the revision of the framework governing the traineeship of law graduates, the redesign of the examination system for trainee lawyers, the introduction of evaluation mechanisms for lawyers’ professional development, and the adoption of complementary measures aimed at improving the efficiency and quality of legal practice.

This reform aims to enhance the quality of legal services, strengthen transparency, and ensure the proper exercise of the legal profession, thereby contributing to the improved functioning of the justice system and reinforcing public and business confidence in the institutions of the rule of law.

Following the recent elections of the bar associations in November 2025, the work of the Committee has been temporarily suspended. However, it is expected to be repeated in 2026 with a new composition, due to changes in the administrative bodies and representatives of the Plenary Session of Bar Associations.

6. Significant developments capable of affecting the perception that the general public has of the independence of the judiciary

a. Justice system reforms: Enhancing Efficiency and Trust in the Greek Judiciary:

Based on the constitutional framework outlined above, it is clear that Greece has a strong constitutional system ensuring the personal and functional independence of judges. Judicial independence has been further reinforced through the recent legislative reform providing for the participation of judges in the selection of the leadership of the judiciary.

Moreover, the Ministry of Justice carefully reviews and assesses all available opinion polls, evaluations, surveys and studies concerning the justice system and its impact on society. The perception reflected in recent opinion polls is not due to a lack of judicial independence, but rather stems primarily from issues related to efficiency and delays in the administration of justice.

For this reason, a systematic and comprehensive reform effort has been undertaken, aimed at the overall upgrading of the justice system. This reform strategy is structured around four main pillars:

- (a) judicial spatial reorganisation, including the reform of the judicial map in civil and administrative justice;
- (b) strengthening and simplification of the legislative framework, with the objective of accelerating proceedings and enhancing effectiveness, including the promotion of alternative dispute resolution mechanisms and the transfer of specific competences to legal professionals;
- (c) digitalisation and
- (d) upgrading of judicial infrastructure.

Improving efficiency, accelerating judicial proceedings and creating a justice system that is friendly to citizens and businesses will undoubtedly contribute to strengthening public trust in the judiciary. Both in our previous written inputs and in the present contribution, reference is made to the measures adopted across all four pillars of the reform, as well as to the first tangible results emerging from their recent implementation.

b. Child-Friendly Justice:

The Ministry of Justice, within the framework of supporting EU Member States in improving justice systems and adapting them to the specific needs of children, develops and implements actions promoting best European practices in child-friendly justice for both juvenile offenders and child victims. Greece was selected among 46 countries as a partner in the joint Council of Europe–EU program (2024–2026) to improve the protection of children involved in the justice system. An assessment tool is being developed to identify gaps in national justice systems and support child-centered procedures and policies.

Innovative measures for preventing juvenile delinquency include expanding rehabilitative measures

under Law 5090/2024, such as participation in educational, artistic, and cultural programs, and participation in sports programs and amateur clubs.

A digital intervention and psychoeducation program, “RE-MIND”, targets adolescents aged 12–16 with mild delinquent behavior, aiming to strengthen moral development, self-regulation, empathy, personal expression, and critical thinking through engagement with literature and philosophy. From 21/10/2024 to 21/10/2025, 19 juveniles participated in such measures.

Mock criminal trials are also conducted in collaboration with Bar Associations, Courts, and Secondary Education Directorates to promote civic awareness. The first Virtual Juvenile Trials took place at the Chania Court, involving judges and students.

The Ministry also leads the CHILDSay project under the EU CERV-2025-CHILD program, focusing on children’s rights in civil justice, especially in custody cases, respecting their views and best interests.

To address juvenile delinquency as a complex issue, Greece implements the National Strategy for Juvenile Violence and Delinquency (until 2030), aiming to raise children safely and ensure child-friendly justice.

Additionally, Child Protection Units (“Houses of the Child”) operate in Athens, Piraeus, and Thessaloniki, with a new unit opening in Heraklion in early 2026. These provide safe, specialized environments for child victims, avoiding secondary victimization during interviews, examinations, or court proceedings. From 21/10/2024 to 21/10/2025, 921 children were examined (34% boys, 66% girls).

Rehabilitative measures under Article 122 of the Penal Code include participation in educational, cultural, artistic, and sports programs.

It is worth noting that the above initiatives were presented by the Ministry of Justice at a special event held in the Plenary Session of the Parliamentary Assembly of the Council of Europe on 26 January 2026, as part of Greece’s participation in the joint programme “European Union and Council of Europe for Child-Friendly Justice”. The presentation focused on the educational programme “Virtual Juvenile Trials” and the interactive programme for juvenile offenders, RE:MIND, which promotes engagement with works of ancient Greek literature, world literature, and philosophical texts. Both initiatives have been recognized as best practices — with distinction — in the Council of Europe Handbook entitled “The State of Child-Friendly Justice in Europe”(6).

Through empowerment, the prevention of delinquency and social reintegration via digital platforms, experiential programmes, and interdisciplinary cooperation, the justice system is transformed into a vehicle for rights and opportunities. In this way, democratic awareness and respect for the rule of law are fostered, while children emerge as active citizens, jointly shaping democracy and the future.

c. Judicial initiatives to strengthen public trust in the justice system

The courts themselves, particularly the higher courts, have undertaken a series of initiatives aimed at enhancing citizens’ familiarity with the institution of justice and with the functioning of the courts. These initiatives seek to promote transparency, improve public understanding of judicial procedures, and strengthen communication between the judiciary and society. Through such actions, the courts contribute to fostering greater awareness of the role of the judiciary in a democratic society and, ultimately, to reinforcing public trust and confidence in the justice system. More specifically:

i. Council of State

1. Conference “Justice: A Foundation for Growth and Prosperity”. In September 2025, the Council of State co-organized, together with the Supreme Court (Areios Pagos), the Court of Audit, the Hellenic Federation of Enterprises (SEV), the Association of Greek Law Firms and the National and Kapodistrian University of Athens, a conference entitled ‘Justice: A Foundation for Growth and Prosperity’. During this conference, participants discussed, among other topics, the crucial issue of restoring trust among the public and businesses in the justice system, and how justice is the foundation of the rule of law and can, therefore, serve as a pillar of the Country’s growth and prosperity. After the completion of the

⁶ <https://www.kathimerini.gr/politics/564042703/sto-symvoylio-tis-eyropis-i-filiki-pros-ta-paidia-dikaiosyni/>
<https://www.haniotika-nea.gr/ta-kania-pane-strasvoyrgo-gia-ti-filiki-sta-paidia-ikaosyni/>

conference, the co-organisers issued press releases on the main topics discussed ('Justice and the media', 'The impact of the justice system on society', 'The impact of the justice system on the economy and competitiveness', 'Establishing a stable and functional legislative system', 'From litigation to alternative dispute resolution', 'Justice in the Mirror: Speed & Quality', 'Implementation of Judgments: The Final Challenge', 'Trust in the justice system as a new foundation for growth and prosperity').

2. Spokesperson of the Council of State. As mentioned in our RoL Input for 2025, the Administrative Plenary of the Council of State appointed an Associate Councilor as the Spokesperson for the Council of State in order to ensure better communication with the media and the public. The Court's Spokesperson has been informing the media about the Court's activities, the content of important judgments issued, as well as about important cases brought before the Council of State, and has been fully active on social media, following the precedent of the CJEU, the ECHR and the French Council of State. Moreover, the Court's Spokesperson regularly participates in meetings with certified judicial press in order to receive the necessary feedback on how communication between the Court and the public can be more effective. At the time being, the Spokesperson is still assisted by the social networks Committee, which is composed of judges and judicial clerks from the Council of State, as well as interns from the Law School of the National and Kapodistrian University of Athens, following a Memorandum of Cooperation between the Council of State and the Law School of the National and Kapodistrian University of Athens. According to article 52 of Law 4963/2022, the Spokesperson shall be assisted by one (1) judicial clerk, preferably of the new branch of Judicial Communication and International Relations, however, the competition to fill these posts is still pending.

3. Statements of the President. Throughout 2025, the Council of State continued as a good practice the issuing of statements by its President to announce important judgments of public interest [e.g. Statements of the President on the judgment annulling a ministerial decision declaring Turkey as a safe third country (March 2025), on the judgment declaring that provisions of Law 5089/2024 that permit civil marriage to same-sex couples and consequently the adoption of children by same-sex couples do not contravene the Constitution (May 2025), on the judgments concerning the establishment and operation of branches of foreign universities in Greece (June 2025)] and the publishing of clear and reader-friendly information about these judgments [e.g. Announcement providing clarifications on the Opinions given to the Administration on the legality of two regulatory presidential decrees concerning the building regulations and the non-expansion of settlements (see Opinions No. 74/2024 and 17/2025) (April 2025), Announcement providing clarifications to the Municipalities following its Opinion (No. 135/2025) on the presidential decree approving the Special Plan for the Environmental Equivalent Upgrading of Cities, aimed at offsetting the use of incentives under the New Building Code (October 2025)].

4. Council of State Annual report: As from 2022, the Council of State publishes its Annual Report, addressed to the general public, under the responsibility of the Communication and International Relations Committee. The Report presents the Court's activities and its case law throughout each year. It also contains summaries of the year's important cases, statistics on the work of the Court and an overview of the key events. In 2025, the Council of State published its Annual Report for 2024. The Report is also available in English and in French. In December 2025, the Annual Report for 2024 was presented to certified judicial press. During the presentation the President and members of the Court discussed with the reporters on the way society perceives the work of the judiciary, and in particular that of the Council of State.

5. Study visits at the Council of State. As mentioned in our RoL Input for 2025, the Court's Committee for Study Visits at the Court (composed of judges and judicial clerks of the Court) continues to host study visits for schools and universities. During the visits, the students attend trials and are informed by members of the Committee about the history of the Court, its competences and the work of the Court, as well as about the institution of justice.

These outreach initiatives are addressed to children and young people across all levels of education, ranging from kindergarten pupils to university students. Particularly emblematic are the mock trials organised for preschool children, such as Little Red Riding Hood v. the Big Bad Wolf, The Case of the Orange Thief, The Witch Inda v. the Wizard Hawk, The Trial of the Storytellers, among others. During these mock trials, very young pupils were invited to take the bench and subsequently participate in deliberations together with judges of the Council of State. The children's insightful questions and sustained interest have been particularly noteworthy and have served as a strong incentive for the Supreme Administrative Court to further encourage and promote these initiatives, with a view to

extending them to all administrative courts across the country (7).

In 2025, despite the temporary relocation of the Court due to restoration and maintenance works at the Council of State's premises in the Arsakeio Hall, eight study visits were successfully organised. Following the recent return of the Court to its main building, a significant increase in educational and outreach activities is planned.

6. Cooperation of Council of State with the Institute of Educational Policy of the Ministry of Education

(8). Moreover, in the Court's effort to approach students and familiarize them with the concepts of rule of law and judicial independence, as well as provide them with insight into the judicial system, and specifically the Council of State, the Council of State initiated a cooperation with the Institute of Educational Policy of the Ministry of Education. This cooperation includes various activities, the first of which took place in October 2025, when 40 Education Advisors participated in a discussion with members of the Council of State regarding the Hellenic justice system and the role of the Council of State, the concept of rule of law, the development of legal awareness, and the possibilities for integrating these topics into the curriculum. As part of this cooperation, the Committee for Study Visits at the Court will draft educational material on these topics to be distributed to schools.

7. Memorandum of Cooperation between the Council of State and the Law School of the National and Kapodistrian University of Athens: In 2025, following a Memorandum of Cooperation between the Council of State and the Law School of the National and Kapodistrian University of Athens, the Council of State reinstated the institution of student internships at the Council of State. The interns, under the guidance of the Court's Judges, will draft summaries of the Court's Judgments.

8. International relations of the Council of State. The Council of State, through its Communication and International Relations Committee, participates in European and international judicial conferences and meetings, where the Court's judges discuss significant issues related to the rule of law and the role of justice [e.g. participation in international conferences such as 'Administration, the public interest, and the judge' in Chile (April 2025), 'Advancing the rule of law and enhancing the access to justice' in Korea (September 2025), 'Seventy-Five Years of the European Convention on Human Rights: The Role of Administrative Court Judges' in Warsaw (October 2025), 'The role of legal professions on maintaining the democratic values' in Brussels (November 2025)]. Additionally, to strengthen the communication and cooperation with foreign courts, members of the Court visit courts of foreign jurisdictions (e.g. visits to the ECHR in September 2025 and to the Supreme Administrative Court of Poland in December 2025) and also the Council of State hosts foreign judges and prosecutors, legal clerks and law students mostly as part of exchange programs (e.g. visits from judges and prosecutors from EU Member States in June 2025, from European legal clerks in October 2025, from law students from Denmark in November 2025).

9. Greek Presidency of ACA-Europe for the period 2025-2027. As mentioned in our RoL Input for 2025, the Hellenic Council of State is a founding member of the International Association of Supreme Administrative Jurisdictions (IASAJ - AIHJA) and, since Greece's accession to the European Union, of the Association of the Councils of State and Supreme Administrative Jurisdictions of the European Union (ACA - Europe). The Court is a member of the Board of the International Association and participates in its meetings. In May 2024 the Council of State took over the presidency of ACA - Europe for the period 2025-2027. During the Greek Presidency, six seminars have been scheduled, three of which will take place in Greece (the first was successfully held in Athens on 10-11 November 2025, the second is to be held in Rhodes in May 2026, and the third in Thessaloniki in May 2027, at which time the presidency will be handed over to the Supreme Court of Latvia), and the other three in Germany (February 2026),

⁷ <https://www.kathimerini.gr/society/563866849/arthro-n-sekerogloy-m-gkana-stin-k-i-dikaiosyni-mesa-apo-ta-matia-ton-paidion>

⁸<https://daily.nb.org/epikairotita/anakoinoseis-dikastirion/i-dikaiosyni-stin-taxi-driseis-ste-kai-iep-gia-tin-evasthitopoiisi-mathiton>

<https://www.kathimerini.gr/society/563854102/synergasia-toy-ste-me-to-iep-gia-tin-ekpaideysi-mathiton-se-themata-dikaiosynis>

Italy (November 2026), and Warsaw (March 2027).

The guiding principle of the Greek Presidency of ACA-Europe for the period 2025-2027 is “The administrative judge faced with current challenges”. Around this principle, the following themes were selected for the respective seminars: environmental challenges (focusing on climate crisis, as well as the rapid increase of tourism), technological challenges (focusing on the introduction of digital technology and artificial intelligence into the organisation and operation of the administration and administrative justice), socio-economic challenges (focusing on migration and the flow of refugees to Europe), financial challenges (focusing on the distribution and collection of taxes, the effectiveness of controls and the expansion of cooperation between States on related issues), new forms of organisation of public administration, the financing of administrative structures and recruitment to public service, as well as the delegation of administrative or possibly judicial tasks to private individuals and redefining the terms and limits of judicial review, particularly in relation to disputes of a highly technical nature. The theme of the first seminar of the Greek Presidency, which, as mentioned earlier, was held in Athens last November, was ‘Climate Change/Climate Crisis. Overtourism’. During this seminar, a detailed presentation of the latest legislative and case-law developments at a European and international level on these topics took place.

10. Working groups on the submission of proposals for the constitutional revision. As mentioned in our RoL Input for 2025, in view of the forthcoming revision of the Greek Constitution, which may lead to the revision of constitutional provisions related to the Council of State and the organisation and functioning of the Judiciary in general, the Administrative Plenary of the Council of State formed working groups, composed of judges from the Council of State. In 2025, these working groups went through and reviewed the constitutional theory, the case law, the minutes of debates on previous constitutional revisions, the law of other States, the recommendations of European institutions, as well as the relevant literature on the submitted revision proposals and submitted their proposals to the Administrative Plenary. The Administrative Plenary will, then, submit the Court’s proposals for the constitutional revision to the Parliament.

ii. Court of Audit

By virtue of (normative) Decision FG8/11729/26.2.2025 of the Court’s Plenum “Rules of Procedure applicable to the judicial formations of the Hellenic Court of Audit” (GG B’ 1866/15.4.2025), the respective Rules previously in force were modified and new provisions were added concerning, inter alia:

(i) The determination of the procedure for the delivery of the Plenum’s Opinion on the appointment (by promotion) of the Court’s President, Vice-Presidents and Deputy Advocate General, according to Art. 59 (para.3) of Law 4938/2022. In 2025, the position of Vice-President was filled by promotion, following a secret ballot, the Minutes of which were sent to the Minister of Justice.

(ii) The constitution of a three-member Committee, assisting the President of the Court in overseeing the implementation of the General Data Protection Regulation. The members of this Committee are selected by a decision of the Court’s Plenum for a 2-year office. This Committee has already been set up (Decision FG8/24274/5.5.2025 of the Court’s Plenum).

(iii) The duties of the Court’s Spokesperson; in this regard, the Plenum of the Court (Minutes of the 11th General Assembly of the Full Plenary as of 17.9.2025) approved its Communication Strategy.

(iv) The issuance of a Practical Guide, for lawyers and litigants, on case procedure before the Court of Audit.

(v) The prohibition concerning audiovisual recordings during public hearings, the respective sanctions and derogations.

(vi) The President of the Court of Audit provides the President of the Parliament with the Annual Report of findings, conclusions and recommendations. In 2025, the annual report on the result of the Court’s work was published⁹ and submitted to the President of the Parliament.

9

<https://www.elsyn.gr/sites/default/files/%CE%95%CE%A4%CE%97%CE%A3%CE%99%CE%91%20%CE%95%CE%9A%CE%98%CE%95%CE%A3%CE%97%202024.pdf>

(B) Quality of justice

As mentioned above, a comprehensive reform of the justice system is underway, structured around four pillars: judicial reorganisation, legislative simplification, digitalisation and the upgrading of judicial infrastructure. These reforms aim to enhance quality of justice, improve efficiency, accelerate proceedings and increase accessibility for citizens and businesses. The main reforms and the first measurable results from their implementation are outlined below.

1. Geographical distribution and number of courts/jurisdictions (“judicial map”) and their specialisation, in particular specific courts or chambers within courts to deal with fraud and corruption cases¹⁰.

a. Reform of the Judicial Map of Civil and Criminal Justice (Law 5108/2024) -

i. Preliminary data after of implementation of the Judicial Map ¹¹.

The implementation of the Judicial Map (Law 5108/2024) constitutes one of the most significant structural reforms of recent years aimed at improving the efficiency of the justice delivery system (12). The first statistical data, nine months after its entry into force, indicate a substantial improvement in adjudication times and in case clearance rates.

The number of first-instance judges doubled to 2,100. Geographic distribution Improved and workload balanced. **Court productivity increased from 10% to 60%.** Preliminary statistical data, nine months after the entry into force of the measure, indicate substantial improvements in the duration of proceedings and in case clearance rates.

Nationwide, **the estimated time to issue a first-instance judgment decreased from 705 to 364 days**, a development corresponding to a reduction in the duration of the proceedings from approximately two years to approximately one year. At the same time, **clearance rates rose from 90.3% to 98.7%.**

In particular, at **the Athens Court of First Instance**, the largest court of first instance in the country and one of the largest in Europe, the estimated time for the issuance of a decision was reduced to 513 days, from 1,422 days prior to the reform, that is, from approximately four years to approximately one and a half years. The case clearance rate increased from 87.5% to 100.8%.

Correspondingly, at **the Thessaloniki Court of First Instance**, the estimated time for the issuance of a decision decreased to 227 days from 376 days, that is, from approximately one year to approximately seven months, while the case clearance rate rose from 90.5% to 113.2%.

At the **Piraeus Court of First Instance**, the time required for the issuance of a decision was likewise reduced, from 364 days to 280 days, while the case clearance rate increased from 82.2% to 89%.

Among the key factors contributing to the success observed nine (9) months after the implementation of the Judicial Map are the doubling of judicial capacity—through the integration of former magistrates and the extension of their jurisdiction—as well as the well-prepared territorial reorganisation of courts, carried out following extensive consultation with relevant stakeholders.

10 Please refer to the Annex at the end of this contribution for charts presenting the statistical data of the courts covered in this section.

11 The statistical data are drawn from a broader ad-hoc survey conducted by the Independent Department for the Collection and Processing of Judicial Statistics (JustStat) of the Ministry of Justice. The survey focused on the efficiency of Courts of First Instance in civil proceedings during the period from the launch of the Judicial Map until nine months after its implementation (September 2024 to June 2025), compared with the same period prior to its introduction (September 2023 to June 2024). The analysis concentrated on civil cases, as former magistrates primarily handled civil matters, which were consequently absorbed mainly by civil chambers.

12 Under the new Judicial Map, there are 113 judicial formations at first instance, comprising: 56 Courts of First Instance, 7 parallel Courts of First Instance, and 50 Regional Courts of First Instance. The country is also served by 19 Courts of Appeal regions, namely: Athens, Aegean, Eastern Crete, Northern Aegean, Western Macedonia, Western Central Greece, Dodecanese, Euboea, Thessaloniki, Thrace, Ioannina, Kalamata, Corfu, Crete, Lamia, Larissa, Nafplio, Patras, and Piraeus.

ii. Amendments to the Code of Civil Procedure (Law 5221/2025)

In order to enable the effective and efficient implementation of the Judicial Map, Law 5221/2025 (GG A'133) introduced a comprehensive reform of the Code of Civil Procedure, with corresponding amendments to the Code on the Organisation of Courts and the Status of Judicial Officers, as well as to the Code of Criminal Procedure.

The new Code, which entered into force on 1st January 2026, incorporates practices and procedural solutions drawn from other European Union Member States, adapted to the specific characteristics of the Greek justice system. This reform pursues three main objectives:

- (i) **reducing delays** in civil proceedings up to the issuance of a final judgment, which have contributed to the accumulation of pending cases before civil courts;
- (ii) **expediting the adjudication of objections** in enforcement proceedings, a major source of congestion as such cases often remain inactive while burdening court dockets;
- (iii) ensuring a more **rational allocation of cases** among judicial officers, based on the seriousness and complexity of each case.

To this end, the new Code of Civil Procedure introduces a series of structural and procedural innovations. These include the **strengthening of the pre-trial stage** through the introduction of mandatory preliminary judicial review of the statement of claim, the establishment of **binding deadlines** for the issuance of judicial decisions, and the further development of digital justice through the introduction of the electronic case file (13).

Moreover, Law 5221/2025 establishes **maximum limits on the allocation of cases per judicial officer**, preventing unequal distribution of workload among courts.

At the same time, several procedures that previously imposed a significant workload on civil courts are **transferred to other legal professionals (notaries, judicial bailiffs and lawyers)**.

In particular, **the declaration and publication of wills are now carried out by notaries** through a dedicated electronic platform. Since 1 November 2025, this reform has reduced processing times dramatically, from an average of approximately 400 days to just 3–7 days (for more information and statistical data, please see below, under “Efficiency”).

In addition, **sealing and unsealing procedures are assigned to judicial bailiffs**, while the issuance of payment orders and orders for the delivery of leased property is entrusted to lawyers (entry into force: 1 May 2026) (for more information and statistical data, please see below, under “Efficiency”).

Further reforms address the adjudication of objections at the stage of enforcement proceedings, including the introduction of a special electronic platform, with the aim of reducing distant hearing dates and alleviating the workload of courts of first instance within three years of the platform’s operation.

¹³ **Key innovations of the new Code of Civil Procedure: At first instance**, legal actions are filed with the court registry and served on the defendant, with electronic filing also permitted, while statements of claim must be served within 30 days or on the public prosecutor in cases of service abroad; failure to do so renders the action null (Articles 215(1) and 215 CCP). **Trial dates are now automatically set six to seven months after filing** for domestic cases and nine to ten months for service abroad, with postponement no longer allowed (Article 237 CCP). Judges play an active role in case management, **issuing procedural orders to guide the trial**, prevent repetitive discussions, and expedite proceedings, including the joinder of cases, expert examinations, and the use of technological means; factual deficiencies in claims may be remedied up to ten days before the hearing, and where no orders are issued, hearings proceed based on the submitted material without mandatory lawyer presence, even in judges’ offices (Articles 227 and 236 CCP). Court stamp duty is now paid upon filing a counterclaim rather than at the hearing (Article 237 CCP). **Appeals are filed directly with the registry of the appellate court**, eliminating the previous two-stage filing process and allowing hearing dates within five months, significantly reducing delays (Article 495 CCP). **Inactive cases** cancelled for over a year without a request for a new hearing **are removed from the docket**, time limits for filing appeals, counter-appeals, and additional grounds are clarified and shortened, and certain procedural referral errors no longer permit appeal (Articles 47 and 495 CCP). **At the Supreme Court**, rapporteurs prepare summary reports on admissibility and validity of appeal grounds eight days prior to the hearing, notifying parties and the public prosecutor, while page limits are imposed on appeal pleadings, with any excess disregarded unless corrected within one month (Articles 566 and 571 CCP). **For more information on the new CCP, please refer to the sections “Quality” and “Efficiency” below.**

The implementation of the new judicial map, in conjunction with the aforementioned measures, has as its principal objective the reduction of the time required for the issuance of a final judgment from 1,492 days to 350 days for the issuance of a first-instance final decision and to 650 days for the issuance of a final and binding judgment, a timeframe consistent with the European average. It is already apparent that the results achieved to date are creating momentum for the courts of the country to approach the average level of efficiency of European courts by 2027.

iii. Implementation progress in the two largest Courts of First Instance¹⁴.

(1) Athens Court of First Instance

The Athens Court of First Instance bears the largest workload nationwide. The implementation of the new Judicial Map at this Court progressed substantially in 2025 through a combination of staffing reinforcement, organisational restructuring and infrastructure upgrades.

Judges and Staff: Judicial staffing increased significantly, with the number of judges rising from 400 to 740, while court clerks increased from 450 to 794. For the first time, an independent Criminal Division was established, staffed by 220 full-time judges. The remaining 520 judges serve in the Civil Division, the vast majority on a full-time basis.

Court seats and regional expansion: The Court now operates from two central headquarters: the former Evelpidon School complex, where all criminal cases and certain civil cases are heard, and the former Athens Magistrates' Court on Loukareos Street, dedicated exclusively to civil cases. In addition, three Regional Headquarters were established in Peristeri, Marousi and Koropi, along with temporary Regional Headquarters in Kallithea and Elefsina, which will operate until 15 September 2026, when the expanded territorial jurisdiction of the Court of First Instance of Piraeus enters into force.

Pending cases of abolished Magistrates' Courts: Following the abolition of several Magistrates' Courts, all pending cases from the Magistrates' Courts of Acharnes, Nea Ionia, Ilion, Lavrio, Marathon and Megara were adjudicated. In the case of the abolished Magistrates' Court of Halandri, due to the high volume of pending cases and in order to ensure accessibility for citizens, Article 13(3) of Law 5108/2024 was applied, allowing cases to continue to be heard in the former court's premises.

Secretariat reorganisation: The Secretariat of the Athens Court of First Instance was reorganised into three Directorates—Administrative Services, Criminal Division and Civil Division—in line with the requirements of the Judicial Map. New Rules of Procedure are expected to be adopted by the Court's Plenary Session in 2026.

Infrastructure: a targeted infrastructure upgrade programme was launched. Five buildings of the former Evelpidon School complex were externally restored, and the surrounding area—largely unmaintained since 1984—was refurbished. At the Loukareos Street premises, refurbishment works are ongoing, while approximately 1,300 square meters of previously unused basement space are being converted to accommodate the Court's archives.

Efficiency and Performance Indicators:

Case clearance rate: The rate of case clearance improved significantly during the implementation of the Judicial Charter. In the second quarter of 2024 (prior to the Judicial Charter), the clearance rate stood at 87.5% (incoming cases: 25,529; outgoing cases: 22,340), indicating that incoming cases exceeded resolved cases. From the first quarter of 2025 onwards, the clearance rate became consistently positive, reaching 116% in Q1 2025 (incoming: 42,987; outgoing: 49,851), 111% in Q2 2025 (incoming: 43,740; outgoing: 48,535), and 110% in Q3 2025 (incoming: 25,857; outgoing: 28,455). This demonstrates that the Court not only cleared its incoming caseload but also began reducing older backlogged cases.

Time to deliver final judgments: During the first nine months of the Judicial Charter, the average time to reach a final judgment was 513 days, compared to approximately 1,422 days before the Charter's implementation.

Scheduling and case management: The time taken to schedule cases was significantly reduced. The substantial increase in the number of judges at the Court allowed for an expansion of the unified Commercial–Contract Law Department, where case scheduling had previously been particularly slow (exceeding three years). The number of judges in this department increased from 94 to 164, supporting

14. Data presented in this section are provided by the Supreme Court of Greece (Areios Pagos).

the establishment of 14 new hearing lists, which, together with the 14 existing lists (totaling 28 panels), are now hearing approximately 15,000 commercial and civil law cases. Most of these hearings are expected to conclude in the next judicial year.

Provisional orders: Provisional orders are now issued within 3–4 days, compared to up to 20 days prior to the Judicial Charter.

Effect of the new Code of Civil Procedure: Since 1 January 2026, with the entry into force of the new Code (Law 5221/2025), all commercial and civil law cases are now heard within 7–10 months.

(2) Thessaloniki Court of First Instance

The Thessaloniki Court of First Instance handles the largest volume of cases in Northern Greece. The implementation of the new Judicial Map at this Court has progressed as follows:

Judges and staff: The number of judges increased from 127 to 223, while the number of court officials rose from 212 to 335.

Special Preliminary Investigation Department: A department with twelve preliminary investigation offices was established, staffed by Special Court Judges (former magistrates) appointed for three-year terms, with jurisdiction corresponding to that of the abolished Thessaloniki Magistrates' Court.

Court seats and regional expansion: The Court retained its main seat in Thessaloniki, where it hears both civil and criminal cases with full jurisdiction, and acquired a regional seat in Lagkada for civil cases heard by a single judge.

Pending cases of abolished Magistrates' Courts: Cases from the former Magistrates' Courts of Thessaloniki, Vasilika, Koufalia, and Lagkada were fully adjudicated.

Secretariat reorganisation: The Secretariat was reorganised to meet the requirements of the Judicial Charter, with eleven new departments established, bringing the total to twenty-eight. New Rules of Procedure are expected to be adopted by the Plenary Session in 2026.

Efficiency and performance indicators:

Case clearance rate: In Q4 2023 (prior to the Judicial Charter), the clearance rate was 89% (incoming cases: 11,885; outgoing cases: 10,538), indicating that incoming cases exceeded resolved cases. From Q1 2025 onwards, the clearance rate became consistently positive, reaching 155% in Q1 2025 (incoming: 9,967; outgoing: 13,859), 141% in Q2 2025 (incoming: 10,618; outgoing: 14,963), and 102% in Q3 2025 (incoming: 9,095; outgoing: 9,724). This demonstrates that the Court not only clears its incoming caseload but is also able to reduce backlog cases.

Time to final decision: The average duration to issue a final judgment within nine months improved from approximately 376 days prior to the Judicial Charter to 227 days during the first nine months of its implementation.

Case scheduling: Most cases are now scheduled within two to three months. Exceptions include: land registry cases (up to 1 year), over-indebtedness appeals (up to 5 years), and opposition cases under Article 632 of the Code of Civil Procedure (up to 4 years), for which a dedicated re-discussion platform will be introduced in 2026.

Effect of the new Code of Civil Procedure: Since 1 January 2026, following the entry into force of the new Code of Civil Procedure (Law 5221/2025), all civil, commercial, and property law cases are scheduled for hearings within 7–10 months.

b. Council of State

i. New Procedure under Law 5119/2024: First Year of Implementation – Duration of Proceedings before the Council of State¹⁵

As detailed in our contribution last year, Law 5119/2024 (GG A 103/6.7.2024), which reformed the procedure before the Council of State, was adopted in order to make the entire process more efficient and faster.

According to the statistics for the Council of State, in 2025, the first year of the implementation of the new Council of State procedure, the Court increased its efficiency. More specifically, in 2025 the Court

15. Please refer to the Annex at the end of this contribution for charts presenting the statistical data of the Council of State.

issued 2,490 judgments (an increase of 8.1% compared to 2024), 494 judgments in Council (an increase of 10.3% compared to 2024), 242 judgments of the Suspension Committee (an increase of 23.5% compared to 2024) and 156 Opinions on the legality of presidential decrees (an increase of 14.7% compared to 2024).

ii. Early impact assessment on the new procedure before the Council of State.

In 2025, 3646 cases were submitted to the Court. 1534 of them have already been referred to the procedure before the three-member Council of article 34C of presidential decree 18/1989, i.e. 42.07% of submitted cases. Additionally, due to the new procedure, the Court's Assistant Judges could now be assigned with older cases (i.e. submitted to the Court until 15.9.2024) and 92 judgments (in council) were issued.

iii. Establishment of a prior authorisation procedure for the State's petition for annulment to the Council of State (art. 157 L.5221/2025).

Following a proposal of the Administrative Plenary of the Council of State (see decisions 14/2025 and 21/2025), by article 157 par. 1 of law 5221/2025, the filing of a petition for annulment (appeals in cassation) on behalf of the State, the Independent Authority for Public Revenue (IAPR) and Social Security Organizations is conditional upon the prior grant of permission, which shall be decided definitively, with a brief reasoning, by the three-member Council provided for in article 34C of presidential decree 18/1989. This new measure is expected to lead to a significant improvement in the speed of case processing.

iv. Target -setting report

All Judges of the Council of State implement as a good practice established by the Court's President to draft and send a target-setting report to the President every three months, which should include, among other things, the cases to be handled and other tasks to be completed and subsequently a report on the goals achieved.

c. Administrative Courts ¹⁶.

i. Judicial Map of Administrative Justice (Law 5028/2023, GG A' 54)

Administrative Justice is leading the integration of new digital services. The implementation of the Roadmap for Administrative Justice is progressing well. The pilot introduction of remote hearings in the existing transitional courts is advancing satisfactorily, enhancing both the quality and speed of justice while saving public resources.

The pilot phase will last for two judicial years, allowing judges, court staff, lawyers, and litigants to become familiar with remote procedures. Once any operational issues are resolved, the transitional courts will be converted into fully equipped telematic court offices at the start of the 2026 judicial year. Regarding the **implementation of remote hearings** in the transitional administrative courts under Law 5028/2023, the first telematic session took place on 10 December 2024 at the Administrative Court of Patras, with its transitional seat in Argostoli, and was successfully conducted. This was followed by exemplary remote sessions at the Administrative Court of Appeal of Ioannina (transitional seat in Corfu) on 18 May 2025 and 22 October 2025, the Administrative Court of Appeal of Piraeus (transitional seat in Syros) on 21 October 2025, and the Administrative Court of Tripoli (transitional seat in Sparta) on 5 November 2025.

The objective is for all Administrative Courts—(namely, the two Administrative Courts of Appeal with their four transitional seats, and twelve Administrative Courts of First Instance with their sixteen transitional seats)—to conduct all hearings remotely by the first half of 2026. To facilitate this, the General Secretariat has circulated guidance documents to all relevant courts, including a model Presidential Order and a model notice/serving template.

ii. Legislative Developments Concerning Administrative Courts: Law 5172/2025: Redistribution of Judicial Workload in Administrative Courts

Law 5172/2025 (GG A' 10) introduced a significant redistribution of judicial workload among Administrative Courts, revising both subject-matter and territorial jurisdiction. The aim is to ensure a

16. The data are provided by the General Secretariat of the Administrative Courts of Greece.

balanced distribution of cases, reduce the workload of Administrative Courts, and ultimately enhance judicial efficiency and accelerate case resolution.

Specifically, certain cases were transferred from Administrative Courts of Appeal to Administrative Courts of First Instance, including:

- a. substantive disputes concerning public procurement contracts, and
- b. annulment proceedings, with the dual objective of familiarizing first-instance judges with annulment procedures and alleviating the caseload of the Courts of Appeal.

Furthermore, the Code of Administrative Procedure was amended regarding territorial jurisdiction in tax disputes. The new criterion is now the residence of the taxpayer, rather than the seat of the issuing authority. This change provides greater legal certainty for taxpayers and ensures a more balanced distribution of tax cases across the country, easing the burden on courts in Athens, Piraeus, and Thessaloniki.

Similarly, for enforcement proceedings, a new category of contested administrative acts was introduced, aligned with the updated legal framework for the compulsory collection of public revenue. The territorial jurisdiction for challenges to administrative enforcement acts was redefined to facilitate faster and more effective judicial resolution, while ensuring security and fairness for the parties involved.

iii. Annual Productivity of Administrative Courts (16.09.2024 – 15.09.2025)¹⁷.

In 2025, the second-instance Administrative Courts of Appeal achieved a significant increase in their annual clearance rate, averaging 126.99%, with a reduction of 3,800 pending cases, resulting in 29,054 pending cases as of 15 September 2025, compared to 33,545 pending cases at the end of 2024 (31.12) and a clearance rate of 97.46%.

Overall, the combined clearance rate for first- and second-instance courts reached 112.13%, reducing the total number of pending cases by 2,483, bringing the total pending cases to 98,185, compared to 107,352 pending cases at the end of 2024, with a combined clearance rate of 107.98%.

These figures indicate a clear improvement in case management, contributing to faster justice delivery and enhancing the quality of justice.

d. Economic Crime Prosecutor's Office

The investigation and prosecution of corruption and complex economic crime remain key priorities. Cases handled by specialised prosecutorial authorities are characterised by a high degree of complexity, involving extensive financial analysis, asset tracing, examination of complex corporate structures and cross-border cooperation. In recent years, prosecutorial authorities—particularly those responsible for economic and corruption-related offences—have been entrusted with additional and increasingly demanding responsibilities. These include cases involving European Union funds, complex transnational financial schemes and close cooperation with bodies such as the European Public Prosecutor's Office (EPPO) and EUROJUST, significantly increasing both the substantive and procedural complexity of their workload.

Adequate staffing levels and the timely availability of trained prosecutorial personnel are essential for the sustainability of anti-corruption enforcement. In response to requests submitted by prosecutorial authorities, measures have been adopted to accelerate the entry into service of newly trained prosecutors, notably through the shortening of the training period at the National School of the Judiciary, enabling trainee prosecutors to assume duties at an earlier stage. This measure aims to address staffing shortages at first-instance level and to support the effective handling of corruption and economic crime cases (for more details for the shortened training period for trainee prosecutors, please see below under the question "Training of justice professionals...").

Furthermore, in the forthcoming draft law of the Ministry of Justice entitled "Establishment and Operation of a Unified Digital Registry for Monitoring Corruption Cases, Interventions in the Code of Civil Procedure, and Other Provisions", which has already been published for public consultation, an increase in the authorised number of judicial and prosecutorial posts is foreseen, again following requests by prosecutorial authorities. The proposed provisions provide for the creation of 50 additional

17 Please refer to the Annex at the end of this contribution for charts presenting the statistical data of the administrative courts.

prosecutorial positions across all levels, as well as 55 additional judicial positions in the senior and highest ranks of civil and criminal justice (for more details for the increase in authorized posts for judges and prosecutors of Civil and Criminal Justice, please see below under the question “Resources of the judiciary...”).

Effective investigation of corruption also relies on close and timely cooperation between prosecutorial authorities and administrative, supervisory and law-enforcement bodies. The expanding scope of corruption-related investigations, including those with a European dimension, further underscores the need for strong and consistent inter-agency cooperation. In this context, targeted safeguards proposed by prosecutorial authorities have been adopted in order to strengthen investigative capacity and ensure continuity in the execution of prosecutorial orders. Notably, despite the institutional integration of the former Financial and Economic Crime Unit (SDOE) into the Independent Authority for Public Revenue (AADE), Article 254 of Law 5222/2025 expressly preserved the competence of former SDOE officers to conduct criminal investigations following orders issued by the Economic Crime Prosecutor. This legislative safeguard ensured the continuity and completion of significant ongoing investigations, avoiding procedural disruption during the transition period, particularly in cases involving projects financed by national and European Union funds.

At the same time, prosecutors have identified operational challenges stemming from staffing shortages and institutional limitations affecting certain investigative services, such as the Independent Authority for Public Revenue (AADE), the Directorate of Economic Crime Investigations (DEOE), under the Ministry of Economy and Finance, and the Economic Police Directorate, under the Ministry of Citizen Protection. These justified concerns are being addressed through targeted measures, including the 2026 recruitment plan, which provides for the recruitment of more than 900 new civil servants to be deployed to auditing and supervisory independent authorities. These include, inter alia, the Independent Authority for Public Revenue (AADE – 700 planned recruitments), the National Transparency Authority (EAD – 11 planned recruitments), the Authority for Combating Money Laundering (4 planned recruitments) and the Hellenic Competition Commission (7 planned recruitments). For further information on the recruitment plan and related organisational measures to strengthen anti-corruption authorities, please refer below to Pillar II: Anti-corruption framework).

2. Digitalisation / Use of assessment tools and standards.

a. Digital Transformation of Justice (Total Budget: €220 million from the Recovery and Resilience Facility – RRF)

As highlighted in our previous contributions, Greece is undertaking an extensive digital transformation of the justice system, aimed at full implementation by 2026. In 2025, a series of major projects were implemented, financed through the RRF, co-financed programs, and structural funds, with a total budget of €220 million, while the remaining initiatives are expected to be completed by 2026 (18).

Specifically, the implementation of these projects is being closely monitored, and their progress is as follows:

i. Progress of the Integrated Case Management System for Civil and Criminal Justice (ICMS-CJ/ ΟΣΔΔΥ-ΠΠ)

¹⁸ Major projects, monitored by the RRF:

- Integrated Case Management System for Civil and Criminal Justice (ICMS-CJ)
- Integrated Case Management System for Administrative Justice (ICMS-AJ)
- Integrated Information System of the Court of Audit
- Enhancement and Expansion of the National Criminal Registry
- Digitisation of Ministry of Justice Archives and Data
- Upgrade of Court Record-Keeping Systems
- Video Conferencing Services for Courts and Correctional Facilities, and e-Filing / Electronic Case Management Services
- Development of a System for Collection and Processing of Judicial Statistics

The ICMS-CJ has so far been deployed in: 82% of Public Prosecutors' Offices nationwide, 80% of Criminal Courts nationwide, and 52.5% of Civil Courts nationwide.

Preparatory actions for Phase B of the project have been completed to integrate the New Judicial Map (Law 5108/2024) and the New Code of Civil Procedure (Law 5221/2025).

Key interventions include:

- Modifications of functionalities** related to the exercise of remedies in Courts of First Instance and Appellate Courts,

- Adjustments to procedural deadlines** concerning the trial and judgment timelines, as well as enhanced pre-trial review of complaints,

- Upgrades** to existing applications of the Supreme Court

- The launch of the **wills publication platform (diathikes.gr)**: From 1 November 2025, all types of wills – handwritten, secret, and public – will be digitally published on diathikes.gr, managed by the Bar Association of Athens, Piraeus, Aegean, and Dodecanese, under the supervision of the Ministry of Justice (Law 5221/2025). The platform will reduce the workload of judges and court staff, streamline time-consuming procedures, limit travel, and minimize citizens' inconvenience, thereby improving the quality and efficiency of justice. (For more information, please see below, under "Efficiency").

- The **electronic resubmission of appeals against enforcement orders and payment orders**.

- The establishment of the **Electronic Case File (ECF)**: The implementation of the Electronic Case File represents a milestone in the new Civil Procedure Code (Law 5221/2025) and constitutes one of the most significant reforms within the framework of the digital transformation of the Justice system. Through the ECF, the following benefits are achieved:

For lawyers: They can submit all documents electronically from their offices, select from the system's proposed hearing dates, and monitor the progress of the case electronically.

For judges: They gain immediate and full electronic access to all case materials, eliminating bulky printouts and delays.

For citizens: Easier, faster, and more cost-effective access to Justice is ensured. Physical presence in courts is no longer required, saving time and expenses, while trust in judicial institutions is strengthened through the transparency and reliability of electronic procedures. The system allows for electronic filing and grouping of case documents, viewing all case materials, retrieving digital documents by lawyers, electronic submission to the Supreme Court, and submission and issuance of certificates through the Supreme Court.

Timeline: Starting 1 January 2026, all required documents for cadastral cases will gradually be submitted electronically, and from 1 April 2026, the system will be extended to all cases under ordinary proceedings. Full implementation of the Electronic Case File across all levels and branches of Justice (criminal, civil, administrative) is expected to be completed by the end of 2026.

ii. Integrated Case Management System for Administrative Justice (ICMS-AJ/ ΟΣΔΔΥ-ΔΔ)

This project, which will enter a pilot phase in June 2026 and become fully operational in September 2026, marks the second phase of the digital transformation of Administrative Justice, during which the available digital tools will support the full range of procedures and activities of the Administrative Courts.

The benefits of this transition are numerous. First and foremost, citizens' access to justice is greatly facilitated, both in terms of time and cost, as the entire process before the Administrative Courts—including filing of pleadings, case monitoring, hearings, issuance, and service of decisions and other documents—can now be conducted digitally. Citizens will also be able to obtain all required certificates electronically. Lawyers will enjoy the same efficiencies.

At the same time, support for judges and court staff is enhanced: thanks to the interoperability of ICMS-AJ with public sector information systems and other relevant authorities, the registration, completion, and circulation of case files are now fully digital.

Furthermore, with the introduction of artificial intelligence tools, judges and court staff are assisted in key tasks, such as case law research and data entry.

Regarding the Council of State, it is worth noting that, from 2025 onward, all files of regulatory presidential decrees are transmitted electronically to the Court through a platform administered by the Presidency of the Hellenic Republic ("Papyrus"). Judges of the Council of State have access to this platform and to all documents in each file, enabling the Court to issue opinions on the legality of the decrees in a fully digital and streamlined manner.

iii. Integrated Information System of the Court of Audit

The Integrated Information System for the Court of Audit, which forms part of the “Digitalization of Justice-Upgrade and extension of ICT infrastructure in the Justice Sector”, funded by the RRF, has become operational as of September 2025. The Integrated Information System encompasses the digital management of court cases and the electronic circulation of related documents.

Within that context, a contractual option entailing the development of a virtual assistant judge (AI Agent), has been enacted. This AI Agent is an artificial intelligence system which shall be integrated into the Court's Integrated Information System for the purpose of providing a natural language interface to its users and support in: a) categorizing and grouping pending court cases in order for them to be assigned to the appropriate trial procedure, b) dealing with legal questions and searching for relevant case law in the context of a free dialogue between the system and users, and c) drafting court decisions (templates). These functions are designed so as to be implemented as predefined workflows, with clearly defined stages and validity checks by the system users who are responsible for carrying them out. In order to define and analyze the technical and functional requirements of the system, a working group consisting of judges was set up by virtue of a decision of the President of the Court.

iv. Strengthening and Expansion of the National Criminal Records System

The strengthening and expansion of the National Criminal Records information system, through the modernization and upgrade of its central infrastructure and applications, is expected to be completed by June 2026.

v. Digitization of Archives and Data

This project includes the archives of 368 Courts and Prosecutor's Offices, of which 288 are located on the mainland and 80 on the islands. The total number of pages to be digitized is approximately 300,244,990, with project completion expected by June 2026. To date, 53.67% of the archives have already been digitized.

vi. Upgrade of the Court Record-Keeping System

The project, expected to be completed by June 2026, concerns:

- Upgrade of central and local IT infrastructure, including software and peripheral equipment, and the interconnection of the Information System and infrastructure for the digital recording, archiving, and provision of hearing minutes from civil and criminal courts across the country. These minutes are currently produced through the existing Recording–Transcription system.
- Provision of Recording–Transcription services for court hearing minutes, through digital recording, storage, and availability of minutes from civil and criminal court sessions. The system will handle at least 110,000 hours per year throughout the duration of the project (36 months).

vii. Expansion of Videoconferencing Services in Courts and Correctional Facilities – Electronic Docket (e-Docket)

The project, expected to be completed by June 2026, consists of the following actions:

Action 1: Implementation of a nationwide videoconferencing network in courts and correctional facilities, covering the needs of civil, criminal, and administrative courts, investigative work (Courts of First Instance), and requests for judicial assistance. Type A equipment (fixed) has already been installed in 151 courtrooms, and Type B equipment (mobile) in standard courtrooms, investigative offices, and correctional facilities.

Through this action, the following are enabled:

- Remote deposition/examination of witnesses who are located far from the trial venue, abroad, or are in custody.
- Conducting preliminary investigations, pre-trial investigations, and formal examinations.
- Remote satisfaction of judicial assistance requests.

Pilot trials have already been conducted in selected courts for civil, criminal, and administrative proceedings. Furthermore, through videoconferencing: 230 investigations, 30 official communications, 24 sessions in transitional court seats, 6 judicial assistance cases, and 2 remote trial examinations have been conducted.

Action 2: “Services for monitoring the status of dockets and exhibits in courts.” Through an information system, the real-time status of dockets and exhibits will be published online to interested parties (lawyers, citizens, etc.), in compliance with the GDPR regulations.

viii. Development of the Justice Statistics Collection & Processing System

The project was completed in October 2025 and is already contributing to the systematic collection and processing of judicial statistical data. It now enables the mapping and evaluation of the current state

across all sectors of the justice system, supporting policy formulation and the submission of proposals to the competent judicial bodies regarding the smooth flow of cases, optimal staffing levels in various judicial structures, addressing structural, organizational, and operational inefficiencies, and, more generally, faster and more effective administration of justice.

b. Use of Artificial Intelligence

Within the framework of leveraging new technologies in the judiciary, the use of artificial intelligence for anonymizing court decisions and making them publicly available, combined with providing electronic information services to the public on judicial matters, will contribute to increased transparency in the functioning of the justice system.

c. Additional Digital Initiatives

In parallel with the major projects, a series of supplementary digital initiatives are being implemented, including:

-Criminal Service of Documents – Phase II: Expected to be completed in the first half of 2026, this project involves the electronic delivery of necessary legal documents to citizens (litigants, witnesses, etc.) via the citizen's electronic mailbox (19).

-Operational launch of the digital platform for transmitting orders lifting communications secrecy: This includes extension or suspension of the lifting, issued by any prosecutorial or judicial authority, through encrypted electronic messages (Articles 8(1) and 8(2), Law 5002/2022).

-Pilot projects using Artificial Intelligence, for:

- a) recording spoken language, converting it to written text, and saving it as an editable text file,
- b) translating legal documents into selected languages (pilot projects),
- c) real-time interpretation and transcription of foreign witnesses' testimonies.

-Operational launch of the EU decentralized IT system for transmitting and receiving requests, forms, and other notifications under Regulation (EU) 2020/1783 (taking of evidence in civil or commercial matters) and Regulation (EU) 2020/1784 (service and notification of judicial and extrajudicial acts across Member States in civil or commercial matters).

d. Training of justice professionals

A particularly important aspect of digital projects is training justice professionals and staff who use these systems. In the major digital projects, e-learning materials are being developed and deployed on e-learning platforms, aiming to enhance the digital skills of justice personnel for effective and secure use of technology in the administration of justice.

In summary, the digital projects that have already been completed are:

- *Integrated Information System of the Court of Audit*
- *Electronic court dockets (pinakio.gov.gr)*
- *Digital service of criminal documents*
- *Videoconferencing services in courts and correctional facilities (<https://portal.e-diki.justice.gov.gr/>)*
- *Digitization of judicial files, reaching a completion rate of 53.67%*
- *Case Management Systems: continuous nationwide expansion of OSDDY-DD (Administrative Justice) and OSDDY-PP (Civil/Criminal Justice) systems*
- *Electronic Case File (E-File)*

¹⁹ Within the framework of the project, thirty-three (33) types of electronic service of documents from Prosecutor's Offices of Courts of Appeal and Courts of First Instance will be developed, the scope of which will be determined during the analysis phase. To date, through the above platform and the interoperability established with the Integrated Judicial Case Management System for Civil and Criminal Justice (OSDDY-PP), criminal orders, decisions regarding absentee witnesses, and witness summonses have resulted in 23,889 successful digital deliveries by the Courts of First Instance Prosecutor's Offices in the regions where OSDDY-PP has already been deployed. The success rate of electronic service to the citizen's digital mailbox currently stands at 55.60%. The service of the above documents will be conducted electronically to the concerned citizen via the electronic service platform "poinikesepidoseis.gov.gr."

- *Wills Publication Platform (diathikes.gr)*
- *Digital platform for transmitting orders to lift communications secrecy*
 - *Comprehensive digital platform for state forensic services: this platform will centralize the management of all forensic examinations, autopsy reports, and medical certificates issued by public forensic authorities, significantly improving efficiency, transparency, and accessibility for judicial and law enforcement bodies.*

3. Resources of the judiciary (human/financial/material), remuneration/ bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year).

a. Judges and Prosecutors

i. Draft Law of Ministry of Justice: Increase in authorized posts for judges and prosecutors of Civil and Criminal Justice

In the draft law of the Ministry of Justice entitled “Establishment and Operation of a Unified Digital Registry for Monitoring Corruption Cases, Interventions in the Code of Civil Procedure, and Other Provisions” (currently under public consultation until February 6, 2026²⁰), an increase in the authorized positions of judges and prosecutors is foreseen. The proposed provisions provide for an increase of 50 prosecutorial positions across all levels and 55 judicial positions in the senior and highest grades of civil and criminal justice²¹.

Indeed, following the implementation of the new judicial map (Law 5108/2024) and related legislation, particularly Law 5090/2024 on criminal procedure reform, there is a pressing need to expand the authorized positions of Judicial Officers in Criminal Justice, especially Prosecutors, to meet growing operational demands and bring the country closer to the European average ratio of prosecutors per population and caseload. This need has also been highlighted by prosecutors themselves and their professional associations. Therefore, the proposed measure is essential for the timely administration of criminal justice, as criminal courts currently face significant delays in both pre-trial proceedings and the issuance of judgments, which have in some cases led to international condemnations.

The increase addresses need arising from several factors, including the restructuring of jurisdiction, strengthening criminal plea bargaining, provision of additional infrastructure for pending cases, separation of criminal and civil judicial formations, the launch of the expanded Piraeus judicial district, proper supervision of correctional facilities, staffing gaps due to secondments (e.g., European Public Prosecutor’s Office), and long-term absences for health or family reasons.

ii. Accommodation for judicial officers serving in insular regional court seats

Law 5232/2025 introduced a provision (Article 26) enabling the competent body responsible for financing judicial infrastructure to lease suitable accommodation for judicial officers serving in insular regional court seats. This measure implements proposals put forward by judicial associations and aims to facilitate the effective deployment of judicial and prosecutorial staff, thereby supporting the day-to-day functioning of the justice system.

iii. Judicial pensions

By judgments 889-890/2025 of the Third Chamber of the Court of Audit, following the delivery of judgments 1330-1332/2023 of the Plenum of the Court of Audit and judgments 1-4/2018, 255/2021,

²⁰ <https://www.opengov.gr/ministryofjustice/?p=18065>

²¹ Specifically, according to the art. 59 of the draft law, authorized positions for judicial officers in civil and criminal justice are increased as follows: a) Positions of Deputy Prosecutors of First Instance increase by eighteen (18), so that together with the authorized positions of Court Prosecutors’ Assistants, they total two hundred ninety-seven (297), b) Positions of Deputy Prosecutors of Appeal increase by nineteen (19), reaching one hundred sixty-two (162), c) Positions of Prosecutors of Appeal increase by eleven (11), reaching eighty-nine (89), d) Positions of Deputy Prosecutors of the Supreme Court (Areios Pagos) increase by two (2), reaching twenty-eight (28). Authorized positions of judges in civil and criminal justice are further increased as follows: a) Appeal Court Judges by forty (40), b) Presidents of Appeal Courts by ten (10), c) Supreme Court Judges (Areopagites) by five (5).

256/2021 and 2/2022 of the Special Court of Article 88(2) of the Constitution, it was held that the provisions of the pension scheme in force prior to Law 4387/2016, i.e. the provisions of the Pension Code, must be implemented in regard to judges' pensions' regulation for the first time and adjustment in order for the constitutionally enshrined direct relationship between active salary and pension, provided for this category of pensioners, to be preserved. The respective cases have been referred back to the Electronic National Social Security Entity (e-EFKA) in order for the pensions of those litigants to be adjusted and paid, in accordance with the rulings.

iv. Voluntary exit schemes

Voluntary exit schemes are viewed by part of the judiciary as a potentially positive tool for the renewal and strengthening of human resources within the justice system. According to economic prosecutors, such schemes may contribute to the gradual rejuvenation of prosecutorial and judicial staff, allowing for the departure of officials who, for personal reasons or due to a reduced capacity to meet the increasing demands of their duties, are no longer in a position to perform effectively in particularly complex and resource-intensive areas. The feasibility of introducing this provision is currently under consideration.

b. Judicial Clerks

i. Recruitment of Judicial Clerks- Remunerations

1.The Ministry is reinforcing court staff through the recruitment of judicial clerks. Between 16 September 2023 and 16 September 2025, four competitions were announced by the National School of the Judiciary, and training for the fourth cohort began in January 2026. During this period, a total of 1,041 clerks are expected to have been trained and assumed their duties.

Specifically, the first cohort included 293 clerks, the second 219, and the third 304, all of whom are already serving in the courts. The fourth cohort comprises 225 positions, with training running from January to June 2026. The training of all four cohorts, with a total budget of €12 million, was funded by the Recovery and Resilience

Furthermore, during 2025, additional measures were taken to strengthen judicial clerks, including the following:

2. Article 14 of Law 5197/2025 (GG A' 76) amended Article 55Z of Law 4871/2021 (A' 246) on competitions for judicial clerk trainees. Candidates choosing certain seats—including island, small and medium mainland, and small mountainous municipalities—receive additional points to their final score. The measure aims to fill positions in hard-to-staff areas, where vacancies and understaffing are common. The ten-year tenure requirement ensures long-term commitment. This approach promotes balanced distribution of personnel, reduces operational gaps, and maintains adequate court services. According to the final results for the fourth cohort, the score-boosting measure has proven successful.

3. By Article 116 of Law 5264/2025 (GG A' 239), an exceptional competition for judicial clerks was established under strict timelines, targeting the fifth cohort of trainees at the National School of the Judiciary (ESDI). Selected clerks are required to serve for at least seven years in the position to which they are appointed. The announcement is expected in January 2026, with the competition taking place between February and March 2026. Training for successful candidates will last four months, from 4 May to 31 August 2026. The positions will be assigned to the courts and prosecutor's offices in Athens, Piraeus, and selected islands facing exceptional staffing needs. This measure aims to rapidly fill vacancies in court and prosecutor registries through a merit-based, organized program of recruitment, training, and practical experience.

ii. Council of State:

4. Under Article 144 of Law 5221/2025 (GG A' 133), 50 additional positions for judicial clerks of various specializations were established at the Council of State. The competition to fill these posts is conducted by the Council itself. After a two-month training period, clerks are appointed to the Council and cannot be transferred or seconded elsewhere for seven years. This exceptional measure responds to severe understaffing at the Council, as noted in the 2024 Evaluation Report of European Judicial Systems by the European Commission for the Efficiency of Justice (CEPEJ). The increase in staff is expected to relieve judges of administrative duties, allowing them to focus on judicial work, thereby improving the Court's efficiency. The Administrative Plenary of the Council of State recently amended the Court's Rules of Procedure (Decision 37/2025) to include these new positions.

5. Remuneration for Extra Duties: Article 143 of Law 5221/2025 provides remuneration to the judicial clerks of the Council of State who participate in the Court's Committees and assist the Special Courts referred to in par. 2 of article 88 and article 99 of the Constitution, to the Supreme Judicial Council of Administrative Justice and to other Disciplinary and Personnel Boards. This provision aims, on the one hand, to acknowledge the substantial contribution of the Court's judicial clerks to the work of justice, which often requires them to work beyond regular working hours, and, on the other hand, to provide them with an incentive to participate in the numerous Court's committees that are currently staffed by judges. In this way, judges will be relieved of additional duties and will be able to focus on their judicial work.

6. As mentioned in the RoL Input for 2025, **a new branch of Judicial Clerks is established to support the Judicial Documentation and the Judicial Work.** After successfully completing a twelve-month training period in March 2025, 27 Clerks of this new branch were appointed at the Council of State. By decision 4/2025, the Administrative Plenary of the Council of State established their duties. These Clerks have been assisting the Court's judges with the tasks of classification, planning, coordination, practical processing and documentation (legislative, jurisprudential and bibliographical) of the relevant cases. These clerks, who are highly qualified, are expected to contribute to the Court's efficiency.

iii. Administrative Courts

7. The judicial officers for Judicial Documentation and support of Judicial Work serving in the General Inspectorate and the Administrative Courts total 42 and are distributed as follows: 3 at the General Inspectorate, 10 at the Athens Administrative Court of Appeal, 5 at the Thessaloniki Administrative Court of Appeal, 5 at the Piraeus Administrative Court of Appeal, 10 at the Athens Administrative Court of First Instance, 5 at the Thessaloniki Administrative Court of First Instance, and 4 at the Piraeus Administrative Court of First Instance.

Within the General Inspectorate of the Administrative Courts, where an Independent Department for Documentation and Support of Judicial Work operates, these officers support the Inspectorate by conducting public procurement procedures, organizing training activities, processing administrative case law, updating the Inspectorate's website, maintaining records on pilot proceedings, internal rules of operation and related Council of State decisions, identifying conflicting judgments through the O.S.D.D.Y.–Administrative Courts database for appeals in the interest of the law, and keeping records on court infrastructure. In the Administrative Courts, they provide direct assistance to judges and are involved in the classification and preliminary processing of cases.

iv. Court of Audit

8. The Annual Recruitment Plan 2026 (Council of Ministers' Act No. 29/27.10.202522) provides for the recruitment of thirty (30) judicial officers for Judicial Documentation and support of Judicial Work in the Court of Audit, who are expected to contribute to the Court's efficiency.

v. Working Group for the Reform of the Code of Judicial clerks

As noted in our contribution last year, by decision of the Minister of Justice (Official Gazette YODD 1304/2024, as amended and currently in force), a Working Group was established to reform the Code of Judicial Clerks. The Group was composed of judges, representatives of judicial clerks and officers of the Ministry of Justice.

The main focus of the Group's work was the proposals submitted by judicial clerks representatives concerning specific provisions of the Code that required review due to insufficient implementation and potential disruptions to the smooth functioning of the courts. It was, however, considered that only targeted improvements were needed, rather than a complete overhaul of the recent Code (Law 4798/2021).

Based on the presentation of proposed changes, related recommendations, discussions, and voting, the Working Group decided to propose amendments to provisions concerning the evaluation of judicial officers, selection of heads of organizational units, and leave policies for judicial officers.

²² <https://www.ypes.gr/etisios-programmatismos-proslipseon-2026-ekdothike-i-yp%CE%84arithm-29-27-10-2025-praxi-ypourgikou-symvouliou-me-thema-egkrisi-programmatismou-proslipseon-etous-2026-kai-tropopoiisi-t/>

The Group completed its work in December 2025, and a draft of the proposed provisions, together with an explanatory report, is expected to be submitted to the Ministry of Justice.

c. Upgrading of the Ministry of Justice Building Infrastructure (Total Budget €500 million – RRF & National Funds)²³.

A comprehensive program for the renovation and upgrading of building infrastructure, with a total budget of approximately €500 million, is currently underway. The program is financed through the Recovery and Resilience Facility (RRF) and national funds. This initiative constitutes a unified plan to modernize judicial buildings across the country. The plan is being implemented along the following lines:

1. Building upgrades funded by the RRF (€124 million): including Administrative Courts of Athens, the Council of State, construction of a new courthouse in Piraeus, and energy upgrades at the National School of the Judiciary (ESDI) and the Court of Audit.
2. Upgrades to the courts at Evelpidon and creation of a new floor at the former Athens Magistrate's Court: estimated budget €60 million.
3. Development of new courthouses through Public-Private Partnerships (PPPs): total amount €238 million.
4. Repairs and renovations of existing court buildings and construction of new ones funded by TAXDIK: €60 million.
5. Leasing modern premises where existing facilities are insufficient.

Already in 2025, significant maintenance and renovation works have been completed in courthouses nationwide, including the refurbishment of courtrooms, judicial staff offices, and the upgrading of electromechanical infrastructure. At the same time, new buildings have been leased where existing facilities were deemed inadequate. These leases are carried out through the Lease Committee, pursuant to Article 34 of Law 5119/2024.

Specifically, to date:

- Council of State: Renovation works of the Arsakeio Building have been completed with full accessibility for persons with disabilities. Additionally, the historic Old National Printing House building has been allocated to the Council of State as a supplementary courthouse (Decision of Minister of Justice 3761, GG B 165/19.01.2026).
- Athens Administrative Courts: upgraded courtrooms equipped for remote hearings, teleconferences, and virtual sessions; improved accessibility for persons with disabilities; enhanced fire safety, anti-terrorism measures, and energy efficiency.
- Launch of the Athens Court of First Instance regional office in Peristeri (16/09/2025)
New courtroom at the Athens Court of Appeal for major trials.
- Leased Premises: Judicial services relocated to leased buildings in Giannitsa, Euboea, Thessaloniki, Kilkis, Lamia, Patras, Molaoi (Laconia), and Koropi to ensure adequate facilities.
- Public Asset Utilization: allocation of 15 buildings owned by the Ministry of Justice or the Judicial Building Financing Fund (T.A.CH.DI.K.) to public sector entities for public purposes, including housing for health, security, or public administration services and social housing.

The program continues with projects scheduled for 2026–2027, including: Energy efficiency upgrades; Seismic reinforcement; Security system upgrades; Full accessibility for persons with disabilities.

The building program, supporting the new Judicial Map in Attica and nationwide, is expected to be completed by 2027.

²³ Please see in annex at the end of the contribution the Ministry's building program.

4. Specialisation (of judges/specific courts/chambers within courts) and training for the judiciary to deal with commercial cases, as well as alternative dispute resolution mechanisms and mediation as regards commercial cases.

a. Specialisation of Judges and Courts:

In our last year's contribution, a detailed presentation was provided on the distribution of the various types of cases across all branches of jurisdiction. More specifically, the presentation covered the civil and criminal justice branches, with particular reference to specialised commercial chambers, other specialised chambers established pursuant to Article 66 of Law 5134/2024 (disputes related to national and EU law on electronic communications, energy and the protection of personal data, special chambers for maritime disputes), as well as criminal chambers. In addition, the competences of the Council of State and the administrative courts, as well as those of the Court of Audit acting as the Supreme Financial Court, were examined, with specific reference to specialised chambers dealing with public procurement matters and to the judicial review of decisions of the Hellenic Competition Commission. To avoid repetition, reference is made to pages 40 et seq. of last year's contribution.

Moreover, it should be noted once again that the implementation of the civil justice judicial map has yielded measurable improvements. The significant increase in the number of first- instance judges enabled the expansion of the unified Commercial and Contract Law Department in Athens Court of First Instance, where scheduling delays had previously exceeded three years. As already noted, the number of judges in the department rose from 94 to 164, allowing for the creation of 14 additional hearing lists. Together with the 14 pre-existing lists (28 panels in total), the department is now processing approximately 15,000 commercial and civil law cases, most of which are expected to be concluded during the next judicial year. Injunction hearings are now scheduled within three to four days, compared with up to 20 days prior to the implementation of the judicial map. Since 1 January 2026, following the entry into force of the new Civil Procedure Code (Law 5221/2025), all commercial and civil law cases are scheduled for hearing within seven to ten months.

b. Alternative dispute resolution mechanisms

In our contribution submitted last year, we provided a detailed account of alternative dispute resolution mechanisms in Greece (please refer to pages 47 et seq. of last year's contribution). In summary:

i. Civil Conciliation: Parties must attempt amicable settlement before certain civil actions (Art. 214A Code of Civil Procedure, Law 2298/1995, A' 62), and courts may propose mediation if appropriate (Art. 214C Code of Civil Procedure, Law 4335/2015, A' 87).

ii. Civil and Commercial Mediation: Governed by Law 4640/2019 (A' 190), with mandatory information, initial session, enforceable agreements, accredited mediators, and ethical/disciplinary rules. Administrative and tax disputes are excluded.

iii. Criminal Mediation: Applies to domestic violence misdemeanors (Laws 3500/2006, 5090/2024, 5172/2025) with safeguards to protect victims and the possibility to suspend proceedings if necessary.

iv. Administrative Disputes: Internal appeal procedures (Art. 63 of Code of Administrative Procedure, Law 2717/1999, A' 97) allow the administration to resolve disputes proactively, enhancing efficiency and reducing court workload.

v. Public Contracts: Prior conciliation is required for disputes arising from public contracts (Art. 126b, Law 2717/1999, amended by Law 5172/2025), particularly for supply and service contracts, ensuring swift resolution.

vi. Tax Disputes – Committee for the Extrajudicial Resolution of Tax Disputes: Established by Art. 16, Law 4714/2020, amended by Law 5167/2024 and further extended by recent legislation (art. 255 Law 5222/2025, GG A' 134). The extension of the Committee's operation, originally scheduled to expire in May 2025, was deemed necessary due to the increased recourse by citizens to the extrajudicial resolution mechanism for tax disputes. This extension aims to ensure the timely resolution of disputes while also accelerating the subsequent judicial examination of cases by the Council of State and regular administrative courts. According to the recent provision, citizens can submit applications until 24 July 2026 for pending cases not yet before the Council of State or regular administrative courts. The Committee must complete examination by 31 December 2026, with reports issued by 31 March

2027, allowing efficient resolution without immediate court involvement and relieving court workload.

c. Special Secretariat for Alternative Dispute Resolution (ADR) – Ministry of Justice

In last year's contribution, we highlighted the initiative to establish a Special Secretariat for Alternative Dispute Resolution (ADR) at the Ministry of Justice (Joint Ministerial Decision 798/28-02-2025, B' 741). The Secretariat's mission is to institutionally, organizationally, and digitally strengthen ADR mechanisms, enabling citizens and businesses to resolve disputes more quickly, efficiently, and cost-effectively, while promoting mutually beneficial out-of-court solutions.

The Secretariat aims to establish a modern, reliable, and outward-looking ADR system in Greece, aligned with European and international standards, enhancing the country's attractiveness as an investment destination and hub for international legal activity. A central objective is to foster a culture of extrajudicial dispute resolution, encouraging cooperation, avoiding conflict, and seeking balanced, mutually beneficial outcomes, with the active participation of judicial actors.

Organizationally, the Secretariat comprises two units: the Mediation and ADR Organisation Unit and the Outreach and International Practices Unit. Its key tasks include the preparation of a Comprehensive ADR Code, expected in the first half of 2026, which will unify ADR provisions, introduce innovative procedures and incentives, and improve clarity and accessibility for both citizens and legal professionals. A working group of experienced judges, academics, and legal practitioners has been established for this purpose.

Additionally, plans include integrating the new ADR framework into the curriculum of Law Schools, so that students become familiar with mediation and other alternative dispute resolution methods alongside core codes such as Civil, Criminal, and Procedural Codes.

Moreover, article 11 of Law 5197/2025 (A' 76) introduces judicial mediation and alternative dispute resolution as subjects within the mandatory continuing training programmes for judicial officers delivered by the National School of the Judiciary.

Other initiatives include:

- Reorganization of the supervision system of the Central Mediation Committee (CMC), clearing 2,500 pending requests by March 2025 and ensuring daily processing of new requests.
- Digital and educational upgrades, funded by the Recovery and Resilience Facility:
 - Upgrading information systems at certified mediation centers for better interoperability and functionality.
 - Development of a specialized training program in mediation, aligned with European standards.
- Legislative initiatives, including draft Presidential Decrees to establish Arbitration Committees at the Volos Chamber of Commerce and at the Athens Chamber of Commerce and Industry (EVEA).

d. Land Registry Mediation (Article 59, Law 5197/2025)

Article 59 of Law 5197/2025 (A' 76) introduces for the first time Land Registry Mediation for cases involving Local Government Organizations, public law entities, or the State, which were previously excluded from mediation procedures. The mechanism aims to prevent the accumulation of a large volume of land registry disputes and reduce the consequent burden on the judicial system. The provision entered into force on 16 September 2025.

Pursuant to Joint Ministerial Decision no 4773/2025 (GG B 6309/25.11.2025) issued by the Ministers of Justice and Finance, the fees of mediators are established, to be paid by the parties participating in the mediation, along with detailed rules on the payment procedure.

5. Accessibility of courts (e.g. court/legal fees, legal aid, language)

a. Council of State

i. Legal fees: By Decision 25/2025 (GG B' 7062/2025), the Administrative Plenary of the Council of State increased the amounts imposed for the parties' legal fees in cases brought before the Council of State. This increase was deemed necessary because the minimum attorneys' fees for the filing of pleadings and the representation before the Court, as well as the minimum annual imputed income from the exercise of professional activity -which constitute the basic criteria for the adjustment of legal fees- have increased.

ii. Accessibility to Court's Judgments. As mentioned in our RoL Input for 2025, since 2015 the public has access to the Court's case law via the website of the Council of State (www.adjustice.gr). [<https://www.adjustice.gr/webcenter/portal/ste/ypiresies/nomologies>].

It should also be noted that in the upgrade of the Hellenic administrative justice case management system (OSDYDD) which is in progress, a tool for the automatic anonymisation and posting of the Court's judgments on the website of the Court and the websites of all administrative courts will be integrated in order for the Court's case law to be automatically updated and accessible to the public. According to the new time plan, this tool will be functional in January 2026. During the initial period of this tool's implementation, the process will be supervised by Judicial Clerks (specifically of the new branch of Judicial Clerks who support the Judicial Documentation and the Judicial Work).

iii. Council of State's premises: Arsakeio Megaron and Old National Printing House building.

In January 2026, the restoration and maintenance of the Council of State's premises at the Arsakeio Megaron has been completed and the Court has returned to its now renovated premises. It should be noted that the renovation included provisions to ensure accessibility for persons with disabilities throughout the building. Moreover, the historic building of the Old National Printing House, located in the center of Athens near the Court's premises which has also been declared a historic preserved monument since 1984, was granted to the Council of State to meet its housing needs. By decision 26/2025, the Administrative Plenary of the Council of State held that after its restoration, the Old National Printing House building will be used as an auxiliary courthouse of the Council of State (Decision of Minister of Justice 3761, GG B 165/19.01.2026).

iv. Guidelines on limiting the extent of the Court's Judgments: As mentioned in our RoL Input for 2025, in 2024, by decision 26/2024 of the Administrative Plenary a working group was formed to establish the guidelines on limiting the extent of the Court's Judgments. The working group submitted their proposal to the Administrative Plenary and by decision 10/2025 the guidelines were approved by the Administrative Plenary. The main guidelines focused on the need for simpler judgments, with clear reasoning that can be understood by the public. The introduction of the above rules is expected to improve the quality of justice (as well as contribute to the reduction of the length of proceedings before the Council of State).

v. Codification of the legislation on the Council of State: Article 22 of Law 5119/2024 provides for the Establishment of a Committee for the codification of the legislation on the Council of State. The members of the Committee were appointed by Ministerial Decision No. 75411/F.380/31.12.2024 (GG YODD 1444/31.12.2024). The Committee has begun its work and is expected to submit its report to the Ministry of Justice at the end of the first half of 2026. The codification and the updating of the legislation on the Council of State is expected to improve the quality of justice.

vi. Guidelines to litigants: As mentioned in our RoL Input for 2025, the Council of State issued Guidelines to litigants for the implementation of the new procedure before the Council of State after Law 5119/2024. Additionally, given that Law 5119/2024 established substantial amendments to the procedure before the Council of State, the President of the Court met with the newly elected President of the Athens Bar Association and of the Plenary of the Greek Bar Associations and it was agreed to launch a series of online seminars for lawyers nationwide, focusing on the procedure before the Council of State as well as on matters of substantive law. Furthermore, it was agreed that templates of pleadings for all types of legal remedies would be posted on the Court's website in order to ensure that lawyers are informed of the minimum requirements for the content of pleadings before the Council of State, in accordance with the new provisions and the Court's Rules of procedure.

b. Civil and Criminal Justice- Supreme Court of Areios Pagos.

(1) Digitisation initiatives enhancing accessibility, efficiency, transparency:

- i. Courts of First Instance of Athens and Thessaloniki & Court of Appeal of Athens (2025): Large parts of the archives of these courts and their regional branches were digitised, a process that continues and is expected to significantly speed up case handling.
- ii. Ministry of Justice Data Digitisation 2026: Scheduled for completion by 31 March 2026, this project includes scanning files from 386 courts and prosecutors' offices, OCR text recognition, creation of a specialised information system for managing and searching digital data, entry of basic case data, quality improvement, and creation of digital copies for legal authorities.
- iii. Mandatory Electronic Filing (from 1 March 2026): Land registry lawsuits will be filed electronically, modernising access to justice and improving case tracking.
- iv. Mandatory Re-determination of Appeals (early 2026): An electronic platform will redefine thousands of enforcement and payment order appeals, allowing cases scheduled for trial as late as 2038 to be resolved much sooner, benefiting debtors, creditors, and credit institutions.
- v. Integrated Case Management System: Currently covers 41 courts and prosecutors' offices in the appellate districts of Athens, Thessaloniki, Piraeus, and Evia, enabling case tracking via <https://www.solon.gov.gr>
- vi. Online Access to Judgments: Anonymised civil and criminal judgments are publicly available:
 - Supreme Court: all civil and criminal decisions from mid-2006 onwards (www.areiospagos.gr)
 - Court of First Instance of Piraeus: maritime law decisions from 2015 (www.protodikeio-peir.gr)
 - Court of Appeal of Piraeus: civil law decisions from 2017 (<https://www.efeteio-peir.gr>)

(2) New Code of Civil Procedure: measures enhancing accessibility

- vii. Bringing of legal proceedings: Legal action is now filed with the court registry and served on the defendant, with electronic filing also allowed (art. 215 par.1 CCP). Trial dates are set automatically: 6–7 months after filing domestically, 9–10 months if service abroad. Postponement of hearings is no longer permitted (art. 237 CCP).
- viii. Legal remedies (appeal, cassation, objection to default judgment, review): Under the new art. 495 CCP, legal remedies are exercised by filing the statement of claim with the registry of the court to which the claim is addressed, rather than with the registry of the court that issued the contested decision, as was previously the case. Upon filing, a trial date must be set immediately, within a maximum of five (5) months from the filing of the legal remedy. In other words, the hearing date for the case is now scheduled immediately upon filing the appeal.
- ix. Supreme Court: summary report of rapporteur judge: Under the new art. 571 of CCP, the rapporteur judge must prepare a summary report on the admissibility of the appeal and the validity of its grounds, submitting it to the Court registry at least eight (8) days before the hearing. The Public Prosecutor and the parties have the right to be informed of the report's contents. This procedure aims to limit the filing and discussion of appeals that are unlikely to succeed.
- x. Supreme Court: Page Limit: Under the new art. 566 of CCP, appeal applications are subject to a page limit. If exceeded, the President of the Plenary or Division may order the attorney to reduce the pleading to the allowed length within one month. Any arguments in excess pages that are not corrected will not be considered.

c. Court of Audit

As stated above, the Court of Audit issued a Practical Guide, for lawyers and litigants, on case procedure before the Court of Audit.

6. Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)-

a. National School of the Judiciary: Recent reforms by Law 5197/2025

By Law 5197/2025 (GG A' 76), the legislative framework governing the National School of the Judiciary (Law 4871/2021, GG A' 246) was reformed, with the aim of upgrading the process of admission and training of candidate judicial officers and ensuring more effective staffing of the country's courts.

In particular, Article 5 amends the existing provisions on the required qualifications for participation in the competitive examination for judicial positions and the submission of applications, in order to raise

the participation requirements and ensure that candidates possess the necessary maturity and experience, the required skills, and sufficient knowledge of the functioning of the national judicial system prior to acquiring the status of judicial officer. To this end, the required years of legal practice as a lawyer are increased from two to three, and a minimum number of mandatory court appearances is introduced.

Furthermore, Article 10 upgrades the continuing training programmes for judicial officers, which are now exclusively mandatory, in order to ensure their adequate professional training, without the distractions caused by participation in optional programme.

b. Selection, Education and Training of Judges, Prosecutors, and Judicial Clerks

According to Law 4871/2021 (GG A 246), as amended and in force, the Hellenic National School of Judiciary (NSJ) is responsible for the selection, education, and training of Judges, Prosecutors, and Judicial Clerks.

i. Education and Training of Judges and Prosecutors

In 2025, the NSJ enrolled 68 students in the Administrative Justice stream, 44 students in the Prosecutors' stream, and 61 students in the Criminal and Penal Policy Justice stream.

For 2026, 12 students are expected to enroll in the Administrative Justice stream, 25 in the Prosecutors' stream, and 85 in the Criminal and Penal Policy Justice stream.

ii. Training of Former Magistrates' Judges- Implementation of Judicial Map.

The NSJ successfully implemented the largest training program for active Judges in Greece, targeting former Magistrates' Judges following the restructuring of the civil and criminal justice system under the Judicial Map. The first-cycle training program covered Civil Law, Civil Procedural Law, Criminal Law, and Criminal Procedural Law.

The program was implemented in four periods:

First period (1 October – 5 November 2024): 6 Regional Training Programs, 10 individual programs, 24 training days with 6 hours per day, totaling 8,640 hours; 268 former Magistrates trained.

Second period (6 November – 9 December 2024): 5 Regional Departments, 24 training days with 6 hours per day, totaling 6,480 hours; 249 former Magistrates trained.

Third period (10 December 2024 – 24 January 2025): 3 Regional Departments, 24 training days with 6 hours per day, totaling 3,024 hours; 191 former Magistrates trained.

Fourth period (27 January – 27 February 2025): 2 Regional Departments, 24 training days with 6 hours per day, totaling 1,728 hours; 174 former Magistrates trained.

Upon completion, former Magistrates are fully qualified to adjudicate all civil cases, and ongoing in-court training will allow them, from 16 September 2026, to handle all criminal cases under the jurisdiction of Single-Member Misdemeanor Courts. This comprehensive training strengthens the effective utilization of human resources in the judiciary and contributes to the faster and more efficient administration of justice in Greece.

iii. Shortened training period for trainee prosecutors

Law 5221/2025 introduced a provision (Article 161) allowing for a shortened training period for trainee prosecutors of the 31st class of the National School of Judges, enabling them to complete their training by February 2026 and to assume prosecutorial duties shortly thereafter. This measure follows a similar arrangement introduced for the previous class and seeks to address staffing gaps at first-instance level, particularly in the rank of deputy public prosecutors. Prosecutors have expressed their agreement with this provision.

iv. Training of Judicial Clerks

In 2025, 350 students were enrolled in the Judicial Clerks stream. Continuing training seminars for active judicial clerks were also held, as detailed in the annex.

For 2026, 225 students are expected to enroll in the Judicial Clerks stream, with seminars organized as listed in the annex.

c. Continuous Training of Judges and Prosecutors and International Activities

In addition to initial education and training, the NSJ organized a series of continuous training seminars for active Judges, Prosecutors, and Court Staff, focusing on key areas of contemporary judicial practice. Particular emphasis was placed on upholding the Rule of Law, freedom of expression and anti-SLAPP measures, combating corruption and financial crime, and the role of independent authorities in the European and national context. These seminars also addressed topics such as fundamental rights

protection, digitalization of justice, artificial intelligence, and judicial ethics. Furthermore, the NSJ actively engages in international cooperation and exchanges. In 2025–2026, it hosted and participated in numerous European and Council of Europe programs, in collaboration with institutions such as the European Judicial Training Network (EJTN), the European Academy of Law (ERA), the European Public Law Organization (EPLO), the European Union Agency for Asylum (EUAA), the World Intellectual Property Organization (WIPO), and the HELP Programme of the Council of Europe. These initiatives have enhanced the professional skills of Greek judges and prosecutors while promoting the exchange of best practices in European and international judicial standards. An annex at the end of this report provides a comprehensive list of all training seminars organized by the NSJ in 2025 and those scheduled for 2026, as well as a detailed overview of the School's international activities.

d. Funding of the National School of the Judiciary

The National School of the Judiciary has acted as implementing body for 6 projects financed by the National Recovery and Resilience Plan 'Greece 2.0' (RRF), under the financial aegis of the Ministry of Justice having a total approved budget of 34.611.923,74 €. These projects have been approved under the RRF Measure 16733 "Skills and digital skills for judges and judicial employees (judicial staff)" and they refer to:

- (a) The initial training of student judges for the 29th, 30th and 31st educational series of the NSJ («SUB 1, SUB 3: Training of candidate/student judges & Training of trainers for judges», 5149206, total budget: 16.936.038,01 €, project closure date 30-06-2026)
- (b) The initial training of candidate judicial staff referring to the 1st, 2nd, 3rd and 4th educational series of the NSJ («SUB 4, SUB 6. Training of candidate/student judicial clerks & Training of trainers of judicial clerks», 5149206, total budget: 12.352.645,94 €, project closure date 30-06-2026)
- (c) The vocational training of serving judges for 2023-2025 («SUB 2. Lifelong training of judges», 5189046, total budget: 1.906.966,66, project closure date 30-04-2026)
- (d) The vocational training of serving judicial staff for 2023-2025 («SUB 5. Lifelong training of judicial clerks», 5215672, total budget: 1.195.073,12, project closure date 30-04-2026)
- (e) The «Lifelong training of Magistrate Court Judges», 5224375, total budget: 1.750.000,00 €, project closure date 31-08-2025)
- (f) The Technical Assistance of the aforementioned projects («SUB 7-Technical Assistance for all subprojects under Measure 16733», 5161699, total budget: 471.200,00, project closure date 30-06-2026)

Following the completion of all the above actions and projects under the Recovery and Resilience Facility (RRF), all future activities of the National School of Judges will be financed through the regular budget of the Ministry of Justice.

e. Memoranda of Understanding and National Cooperation

It is also worth noting that the National School of Judiciary has signed Memoranda of Understanding with national institutions to enhance judicial training and cooperation. Specifically, NSJ has formalized agreements with:

The Tax and Customs Academy – to support training in tax and customs law, administrative procedures, and fiscal compliance.

The Supreme Council for Personnel Selection (ASEP) – to promote best practices in public sector recruitment and judicial appointments.

Additionally, NSJ plans to sign MoUs with the following institutions:

Hellenic Competition Commission – to strengthen training on competition law and regulatory frameworks.

National Transparency Authority (EAD) – to support education on anti-corruption measures and integrity in public administration.

National Bioethics and Technoethics Committee – to provide specialized training on bioethical and technoethical issues relevant to the judiciary.

These collaborations aim to enhance the professional skills of judges, prosecutors, and judicial staff while promoting good governance, rule of law, and integrity in judicial practice.

(C) Efficiency of the justice system:

E.g. Measures as regards length of proceedings, to address backlogs, ...

As highlighted above, a comprehensive reform of the justice system has been launched, aiming to enhance the quality, efficiency, and ultimately public trust in the judiciary.

Beyond the measures outlined above, in this section we would like to highlight the most important aspects of the new Code of Criminal Procedure (modified by Law 5221/2025, A' 133), which are expected to contribute significantly to the effectiveness and acceleration of judicial proceedings, as well as other recent legislative initiatives in the same direction.

1. Key Innovations of the new Code of Civil Procedure are the following:

A. First Instance Courts

1. Amendments concerning the bringing of legal proceedings:

- Legal action is now filed with the court registry and served on the defendant, with electronic filing also allowed (art. 215 par.1 CCP).
- Important reform: Trial dates are set automatically: 6–7 months after filing domestically, 9–10 months if service abroad. Postponement of hearings is no longer permitted (art. 237 CCP).
- The statement of claim must be served within 30 days (or to the public prosecutor if abroad); failure to serve renders the claim null (art.215 CCP).

2. New Regular Procedure:

- Court stamp duty is paid at the filing of the counterclaim, not at the hearing (art. 237 CCP).
- Judges play an active role, issuing orders that guide the trial, avoid repetitive discussions, and expedite procedural stages (art.227 CCP).
- Factual vagueness in claims can be remedied within 10 days before the hearing (art.236 CCP).
- Orders may replace decisions in certain procedural matters, including joining cases, conducting expert examinations, or using technological means to facilitate proceedings.
- If no orders are issued, hearings proceed based on submitted material; lawyers' presence is not mandatory and hearings may occur in judges' offices (art.236 CCP).

B. Appeals and Legal Remedies

1. Filing and Hearing of Appeals:

- Appeals are filed directly with the registry of the court to which they are addressed, eliminating the previous two-stage filing process (art.495 CCP).
 - Hearing dates are set immediately, within 5 months of filing, reducing long delays.
- The new regulation eliminates the previous two-stage appeal filing process, which required first submitting the appeal to the registry of the court that issued the decision, and then re-filing the claim with the registry of the court hearing the appeal to set a hearing date. This change significantly reduces delays, as previously, setting a hearing could take over a year, largely due to procedural requirements handled by the parties' lawyers.

2. Case Management:

- Cases canceled for over a year without a new hearing request are removed from the list (art. 495 CCCP): This provision addresses the backlog of cancelled cases that parties no longer sought to have reheard.
- Time limits for lodging appeals, counter-appeals, and additional grounds are clarified and shortened.
- Certain procedural errors in referring cases between courts no longer allow appeal (art.47 CCP).
- Expansion of the powers of public prosecutors to discontinue proceedings in cases where criminal liability has been extinguished due to the absence of a required complaint, including cases already pending before trial courts. According to public prosecutors, this procedural mechanism contributes to the decongestion of court dockets and allows judicial resources to be redirected towards cases of substantive relevance, through a simplified and less resource-intensive procedure.

C. Supreme Court Appeals:

- Rapporteurs prepare summary reports on admissibility and validity of grounds 8 days before the hearing; parties and the prosecutor are informed (art. 571 CCP).
- Page limits are imposed on appeal pleadings; excess content is disregarded if not adjusted within one month (art.566 CCP).

D. Adjudication of objections at the stage of enforcement, which aims to address the problem of the

backlog accumulated in the courts. As the majority of these cases have already been heard, through the rescheduling of objections via a special digital platform, it is expected that the current illusory situation will be rationalized. The goal is that within three years of the platform's operation, a reduction of the courts' backlog will have been achieved. Moreover, the objecting parties are allowed to schedule the hearing of their cases within a short period of time.

E. Establishment of maximum limits regarding the allocation of cases per judicial officer, in order to prevent uneven distribution of workload across courts.

2. Transfer of Cases to Lawyers (Laws 5095/2024 and 5221/2025)

By Law 5095/2024 (GG A' 39), a significant number of cases of non-contentious jurisdiction have been transferred to lawyers, with the aim of speeding up the administration of justice and strengthening their institutional role. In particular, more than 69,308 cases have already been transferred, and over 229,795 sworn affidavits have been issued by lawyers.

In this way, subject matter that until recently was handled exclusively by the courts—despite the absence of any dispute—is transferred to lawyers. Owing to the prestige of the legal profession and the status of lawyers as unpaid public officials and co-operators of the justice system, quality and legal certainty in the transfer of procedures are ensured. It is noted that sworn affidavits are taken exclusively by notaries public and lawyers, thereby relieving the registries of the Courts of First Instance.

Statistics from transfer cases to Lawyers – 13 October 2025 (Data of the Athens Bar Association)		
Service	Number	Fees paid to Lawyers
Mortgage Pre-notations	59.640	9.541.360
Certificates of Inheritance	6.007	1.200.300
Associations (Registration/Amendments)	3.661	439.260
Total under Law 5095/2024	69.308	11.180.920
Sworn Affidavits	229.795	

Furthermore, pursuant to the recent Law 5221/2025 (GG A' 133), as amended and in force by Law 5264/2025, GG A' 239), a further expansion of the transfer of subject matter to lawyers is provided for. From 1 May 2026, lawyers, acting exclusively through the Plenary of the Bar Associations, will issue payment orders and orders for the delivery of leased premises.

3. Transfer of Cases to Notaries: General Register of Wills (Law 5221/2025)

i. As of 1 November 2025, Greece introduces the General Register of Wills, establishing for the first time an electronic register for wills, seventy-one years after the initial creation of the “Register of Unpublished Wills”.

Pursuant to Law 5221/2025 (GG A' 133/28.7.2025), the publication of all types of wills—holographic, secret, and public—is carried out through the digital platform diathikes.gr, managed by the Notarial Association of the Courts of Appeal of Athens, Piraeus, the Aegean and the Dodecanese, under the supervision of the Ministry of Justice. The system applies to cases concerning deaths occurring after 1 November 2025.

The reform significantly reduces the administrative and judicial burden associated with the publication of wills. In 2025 alone, 10,089 wills were published at the Athens Court of First Instance, involving approximately 100 judges and 12 court clerks, while corresponding figures amount to 59 judges and 11 clerks in Thessaloniki and 29 judges and 1 clerk in Piraeus. Nationwide, the digitalisation of this

procedure is expected to remove approximately 60,000–70,000 cases annually from the courts, allowing judges and judicial staff to focus on core judicial activities.

The measure also addresses excessive delays. Currently, the average duration for the publication of a will is approximately 330 days in Athens and 450 days in Piraeus. Under the new system, wills will be published electronically by notaries on the same day as the submission of the application, or at the latest within seven days, subject to the submission of the death certificate.

In parallel, the General Register of Wills enhances legal certainty and accessibility for citizens by enabling nationwide searches regarding the existence or non-existence of a will deposited with a notary or a consular authority.

Secure access to the platform is ensured in compliance with GDPR requirements, while certificates attesting to the existence or absence of a will are issued on the same day.

The time required for the issuance of publication records and for the declaration of holographic wills as valid is substantially reduced, facilitating the timely use of inherited assets and reducing the circulation of wills of doubtful authenticity.

Finally, the new register will be directly connected to the European Network of Registers of Wills (ARET), facilitating cross-border checks within the EU. The reform constitutes the first fully digital, end-to-end procedure within the Greek justice system and represents a concrete step towards judicial digitalisation, procedural simplification and improved access to justice.

ii. According to the statistical data maintained by the Notarial Association of the Courts of Appeal of Athens–Piraeus, the Aegean and the Dodecanese, from 1 November 2025 to date, 12,191 unpublished wills have been registered in the Wills Registry, which replaced the “Book of Wills” previously kept at the courts, of which publication has been requested for 1,739. Among these, 855 are public wills, 380 holographic wills, 491 third-party holographic wills, and 13 secret wills. It should be noted that the publication of a will occurs immediately, within one or two days from the submission of the testator’s death certificate to the notary.

On average, before the operation of the Registry, the publication of a will required 330 days at the Athens Court of First Instance and 450 days at the Piraeus Court of First Instance.

Furthermore, 9,424 certificates regarding the publication or non-publication of wills and 218 searches of wills were issued, with an average response time to citizens’ requests (including any additional time required to complete missing information) of 8.6 calendar days. At the same time, 441 publication minutes and 17 acts declaring a will as primary were issued on the same day, whereas prior to the operation of the platform, the issuance of a certificate regarding the publication or non-publication of a will took approximately one month at the Athens Court of First Instance.

Overall, according to the statistical data maintained by the Athens-Piraeus-Aegean and Dodecanese Notaries Association, 11,839 cases were processed through the digital platform from 1 November 2025 to date.

4. Criminal Justice:

i. Law 5187/2025 on electronic monitoring of defendants, convicts, and prisoners on leave

Law 5187/2025 (GG A’ 48/21.06.2025), in Chapter B modernises the system of electronic monitoring, originally introduced by Law 4205/2013 and implemented on a pilot basis under Presidential Decree 62/2014. The key objectives of the reform are:

The permanent, nationwide application of electronic monitoring to defendants, convicts, and prisoners on leave who meet the legal requirements, moving beyond the previous pilot framework.

The exemption of monitored persons from any costs associated with the system, enhancing accessibility and effectiveness. Specifically:

Article 172 designates the competent organisational unit responsible for implementing the electronic monitoring system.

Article 174 regulates the procedures for activation, installation, and removal of the electronic monitoring equipment.

Article 175 provides for the protection of personal data of monitored individuals.

Article 179 amends Article 20 of the Penitentiary Code (Law 2776/1999, OG A’ 291), ensuring suitable premises within penitentiary facilities for video conferencing of procedural acts, specifying that such rooms must always be located outside detention areas.

These provisions aim to enhance the effectiveness, accessibility, and security of the criminal justice process through the broader use of electronic monitoring and modern telecommunication tools.

ii. Art. 58 Law 5197/2025: Prosecutorial Oversight of Restrictive Measures:

Article 58 of Law 5197/2025 (A' 76) amends Article 290 of the Code of Criminal Procedure, granting the Public Prosecutor of the Court of Appeal the right to appeal restrictive measures (e.g., bail conditions, house arrest) imposed by investigating magistrates with the agreement of the district prosecutor. The new paragraph 4A specifies that if the Public Prosecutor of the Court of Appeal disagrees with the restrictive measures after reviewing the case file, they can appeal to the Council of Appeals within five days. The Council must decide within five days, either confirming the existing measures or replacing them with house arrest with electronic monitoring or pre-trial detention, and simultaneously issue an arrest warrant if necessary.

iii. Art. 54 Law 5197/2025 – Independent Offices for the Protection of Minor Victims

Article 54 of Law 5197/2025 (A' 76) amends Article 74 of Law 4478/2017, allowing the establishment of Independent Offices for the Protection of Minor Victims in every Court of Appeal district, by presidential decree upon the proposal of the Ministers of Justice, Finance, and Interior. Previously, “Children’s Houses” were limited to specific areas (Athens, Thessaloniki, Piraeus, Patras, Heraklion). This reform enables the creation of such offices in additional regions as needed, strengthening protection for minor victims nationwide.

5. Reorganization of Forensic Services (Law 5172/2025):

By Law 5172/2025 (GG A' 10), the regulatory framework governing the operation of the Forensic Services (Law 3772/2009) was amended, providing for the establishment of a three-member committee responsible for the second-level review of forensic reports. Subsequently, Presidential Decree 30/2025 was issued, through which a comprehensive reorganization of the administrative structure of the Forensic Services was carried out. In addition, committees were established for the drafting of the Code of Ethics for Forensic Physicians and the organizational protocol of the Forensic Services, as well as working groups tasked with drafting protocols for the forensic investigation and management of cases involving child abuse, sexual offenses, mass disasters, and unidentified or unclaimed bodies.

Furthermore, the Ministry of Justice, in cooperation with the University of Piraeus, proposes and develops a new system that incorporates innovative functionalities and integrations to facilitate the identification of observations, knowledge retrieval, and the simplified submission of reports. It supports the Forensic Services both at the examination stage, through a highly user-friendly tablet application, and at the administrative level, through an easy-to-use web interface. The core innovation of this research lies in the design and implementation of an integrated information system that employs advanced intelligent methods to support and automate the entire workflow of a forensic department.

6. Court of Audit

Follow up on the procedures entailing the hearing of cases, which mainly concern reductions in State pensions, by a three-member or single-member judicial panel (Art. 91 of Law 4700/2020 and Art. 52 of Law 5016/2023, respectively): In 2025, on the basis of these procedures, 2.972 judgments (corresponding to claims for judicial protection brought by 27.518 claimants) have been delivered and, therefore, the backlog has further been reduced. These figures are based on an initial estimate; further and more up-to-date information may be provided.

7. Law 5172/2025 (A' 10/29.01.2025): Addressing New Forms of Violence Against Women – Transposition of Directive (EU) 2024/1385 – Additional Measures on Domestic Violence – ... – Strengthening Eurojust Operations – Measures for the Protection of Minors and the Fight Against Criminality.

Law 5172/2025 (A' 10/29.01.2025) introduces comprehensive measures, among others, in the following three areas:

Prevention and Combat of Violence Against Women and Domestic Violence – including the transposition of Directive (EU) 2024/1385, enhanced protection for victims (women, children, and vulnerable persons), measures against sexual exploitation, and targeted improvements to domestic

violence legislation.

Protection of Minors and Combating Criminality – through amendments to the Penal Code and Code of Criminal Procedure, strengthening safeguards for minors and improving the effectiveness of law enforcement and judicial proceedings.

Strengthening Cross-Border Judicial Cooperation (Eurojust) – including revised criteria for the appointment of Prosecutors, expanded lists of offenses for joint investigation teams, and measures facilitating the investigation of crimes involving multiple perpetrators and third-country nationals.

8. TSI: "Backlog Reduction Tool" in Courts of First Instance of Athens and Thessaloniki

The European Commission (DG REFORM) approved a request by the Ministry of Justice for support through the Technical Support Instrument (TSI), with the aim of reducing the judicial backlog in the Courts of First Instance of Athens and Thessaloniki. The project is implemented with the contribution of the CEPEJ of the Council of Europe and is based on its methodology and tools for backlog reduction, through the development and implementation of targeted action plans. The support includes guidelines, strategies, legal advice, studies, training, and on-site expert visits, with the active participation of technical consultants, judges, and judicial officers of the two pilot courts. The project started in mid-2024 with an initial duration of 24 months.

Following the amendments to the Code of Civil Procedure adopted in July 2025, additional funding and a nine-month extension of the project, as of 1 January 2026, were deemed necessary in order to effectively support the implementation of the action plans during the transition period and to ensure sustainable and tangible results in backlog management and judicial efficiency.

Other – please specify

Next steps:

1. Proposed Legislative Amendments to the Ministry of Justice Draft Law “Establishment and operation of a Unified Digital Register for Monitoring Corruption Cases, amendments to the Code of Civil Procedure and other provisions” (under public consultation until February 6, 2026).

In addition to the proposed increase in the number of permanent judicial posts for civil and criminal courts (55 posts) and public prosecutors (50 posts), as provided for in Article 59 of the draft law and already referred to above, the following legislative amendments are worth mentioning.

Article 51 of the draft law amends Article 20 of the Code on the Organisation of Courts and the Status of Judges (Law 4938/2022) with a view to clarifying and strengthening the system for the random allocation and composition of criminal court panels. The amendment extends the lottery system to single-member courts of appeal, revises the rules governing the composition of the Indictment Chambers of the Criminal Divisions of the Courts of Appeal of Athens and Thessaloniki, and provides that judges selected by lottery are excluded from subsequent lotteries for a period of two judicial years. It also clarifies that substitute members participate in criminal hearings and establishes specialised Criminal Divisions within the Courts of Appeal of Athens and Thessaloniki, staffed on an exclusive basis for a fixed term, renewable on the basis of objective criteria linked to experience and performance.

Article 54 of the draft law amends Article 7(3) of Legislative Decree 1544/1942 in order to clarify the scope of exemptions from the judicial stamp duty and align it with the subject-matter jurisdiction of single-member and multi-member courts of first instance.

Article 65 of the draft law introduces new Article 476A into the Code of Criminal Procedure, establishing quantitative limits on the length of certain procedural submissions. Applications for cassation and applications for reopening of proceedings are limited to 20 pages, while additional grounds, appeals against decisions of the Council of Appeal concerning European Arrest Warrants, and applications lodged by the Prosecutor of the Supreme Court are limited to 10 pages. In cases of substantial excess, the filing authority must invite the party to adjust the submission within five days; otherwise, arguments contained in the excess pages will not be taken into account. Only the adjusted submission is considered at subsequent stages, while the date of filing of the original submission

remains decisive for procedural time limits. The provision prohibits the indirect introduction of new grounds through the adjusted submission and is expressly aligned with Article 17 of the Internal Regulation of the Prosecutor's Office of the Supreme Court (Presidential Decree 53/2025). The measure aims to enhance procedural efficiency, proportionality and effective management of cassation review, without adversely affecting the rights of the parties.

Finally, **article 70** of the draft law introduces new Article 64 into the Penitentiary Code, establishing a clear and functional framework for the substitution of custodial sentences with community service, subject to judicial review and after completion of a minimum period of actual detention. The provision seeks to promote the social reintegration of offenders, ensure proportionality in the execution of sentences and alleviate prison overcrowding, while providing for a revocation mechanism in cases of non-compliance.

2. Reform of Inheritance Law.

The reform of the Inheritance Law constitutes one of the most significant institutional initiatives of recent years. Since the introduction of the Civil Code in 1946, substantial social and demographic changes have taken place. Given that reforms in Family Law and Property Law have already preceded, Inheritance Law, as a continuation of Property Law, performs a key social function and must therefore keep pace with contemporary conditions.

The Ministry of Justice seeks to modernize the rules of the Fifth Book of the Civil Code, which have remained unchanged since its entry into force almost eighty years ago. The most important reforms of the bill introduced by the Ministry of Justice concern the following:

- a) The protection of the true intent of the testator, through:
 - i) the introduction of safeguards for holographic wills, such as the mandatory declaration of their validity when a distant relative or a third party (non-relative) is instituted as heir; and
 - ii) the introduction into the Greek legal order of institutions such as the inheritance contract *mortis causa*, under which the deceased may conclude a contract with future heirs, for example with his or her children or with a third party (non-relative), and the inheritance contract involving waiver of future inheritance rights.
- b) Changes to intestate succession. The position and share of the spouse or partner under a civil partnership agreement in the estate are strengthened. In addition, the interpretative issue concerning the exclusion of the intestate inheritance rights of the spouse or civil partner in cases of consensual dissolution is resolved, while for the first time, under strict conditions, a partner in a *de facto* union may inherit in the fifth class of succession.
- c) The transformation of the compulsory portion (forced heirship) from a real (*in rem*) right into a personal (*in personam*) right, taking the form of a monetary claim.
- d) The separation of the estate from the heir's personal property. Until now, the debts of the deceased were borne by the heirs, often leading them to renounce the inheritance in order to avoid such liabilities. Even distant relatives, and their children, were called to inherit, creating a state of legal uncertainty regarding the commencement of successive deadlines for renunciation. All of these changes under the new system. If debts exist, they are satisfied from the estate itself and not from the heir's personal assets. The liabilities of the inheritance no longer affect the heir's individual property.
- e) The definitive resolution of long-standing issues grounded in case law, such as the time limit for renunciation by a person lacking legal capacity and the inheritance rights of half-siblings.
- f) The abolition of institutions of inheritance law that have fallen into disuse (such as possession by ascendants, liquidation of the estate, and extraordinary wills).

3. Reform of the Legal Framework Governing Judicial Guardianship.

Within the framework of the National Action Plan for the Rights of Persons with Disabilities and in line with international best practices, the legal framework governing judicial guardianship is being reformed to ensure modernization and compliance with international standards.

The reform moves away from the traditional substitute decision-making model, under which legal capacity is removed from the individual and decisions are taken by a third party, often for an indefinite period. In accordance with the UN Convention on the Rights of Persons with Disabilities, the new framework promotes respect for autonomy, will, and preferences.

The institution of judicial care is introduced, replacing full and auxiliary judicial guardianship. It allows for limited or partial intervention and introduces supported decision-making, enabling individuals to make decisions autonomously, without the consent of a guardian. Key safeguards include the protection of fundamental rights, the prevention of abuse, the establishment of a Judicial Care Registry, mandatory periodic review of decisions every three years, and enhanced digital interoperability to reduce costs and accelerate procedures.

II. Anti-corruption framework

C. The institutional framework capacity to fight against corruption (prevention and investigation / prosecution)

1. List any changes as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention, detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical/specialised resources as relevant), including the cooperation among domestic and with foreign authorities. Indicate any relevant measures taken to effectively and timely cooperate with OLAF and EPPO.

a. The 2026 recruitment plan concerning auditing and supervisory independent authorities

The continuous strengthening of the functional independence of the independent authorities involved in the prevention or timely detection of corruption, as well as those whose main mission is to safeguard and protect the individual freedoms of citizens, is one of the priorities of the Greek Government. For this reason, the leadership of the Ministry of the Interior contributes to supporting their work by strengthening them with trained, specialized, and appropriately skilled human resources. As stated in the answer to the previous question, the Annual Recruitment Plan 2026 (Council of Ministers' Act No. 29/27.10.202524) provides for the recruitment of more than 900 new civil servants, who will be placed in auditing and supervisory independent authorities, such as the Independent Public Revenue Authority (AADE), the EAD, the Authority for Combating Money Laundering, the Competition Commission, Personal Data Protection Authority etc.

Excerpt from the Annual Recruitment Plan 2026

Authority/Body	Number of Positions
Independent Public Revenue Authority (AADE)	700
Supreme Council for Personnel Selection (ASEP)	30
Authority for Combatting Money Laundering	4
Competition Commission	7
Court of Audits	33
Labor Inspectorate	43
Gaming Control and Supervision Commission	4
Communications Privacy Authority	8
Personal Data Protection Authority	20
National Authority for Higher Education	8
National Transparency Authority (EAD)	11
Regulatory Authority for Waste, Energy and Water	26
Port Regulatory Authority	1
Consumer Ombudsman	4
Greek Ombudsman	1
Capital Market Commission	4
Total	904

²⁴ <https://www.ypes.gr/etisios-programmatismos-proslipseon-2026-ekdothike-i-yp%CE%84arithm-29-27-10-2025-praxi-ypourgikou-symvouliou-me-thema-egkrisi-programmatismou-proslipseon-etous-2026-kai-tropopoiisi-t/>

Beyond new recruitments, the central government is currently working to improve the institutional and regulatory framework governing the operation of independent authorities. This is a technical assistance project, which the Vice-Presidency of the Government is responsible for implementing.

b. National Transparency Authority (NTA):

i. Legal framework

In 2025 there have been no amendments to the legal framework.

ii. Annual Budget:

According to article 82 para. 2 of Law 4622/2019, NTA enjoys administrative and financial autonomy. NTA's annual budget for 2025 was 8,747,000 € (ΑΔΑ: ΨΟ1246ΜΙ0Φ-ΤΔ5). As for 2026, NTA's annual budget is 9,254,000 € (ΑΔΑ: 9Μ5Β46ΜΙ0Φ-ΟΘΨ), representing an increase of approximately 5.8% compared to the previous year, reflecting an enhanced allocation of resources.

iii. Human Resources:

Total number of NTA positions: 503 (374 occupied)

- Inspectors-Auditors: 320 (249 occupied)
- Administrative staff: 183 (125 occupied)

A more detailed outline of the human resource planning and allocation is provided in the following table:

General Directorate/Unit	Inspectors-Auditors		Administrative Staff	
Inspections and Audits' Unit	249		-	
	Central	Regional Units		
	177	72		
Directorate General for Financial and Administrative Services and e-Government	-		59	
			Central	Regional Units
			45	14
Directorate General for Integrity and Accountability			42	
Directorate for Strategic Planning and Behavioural Analysis			15	
Directorate General for Awareness Raising and Actions with Society			7	
Directorate for Internal Audit and Investigations			1	
Governor Office			0	
GDPR Officer			1	
Total	249		125	

iv. Inspectors – Auditors

Further to the (pending during 2025) call for the secondment of fifty-three (53) Inspections-Auditors, the procedures have been completed, and 31 inspectors have taken up their duties.

v. Administrative Staff

Regarding the (university level) administrative staff, through the Supreme Council for the Civil Personnel Selection-ASEP 2023 call (written competition) for recruitment, during 2025 nine (9) employees have already taken up duties. Finally, through the mobility cycle, four (4) civil servants joined NTA via secondments.

vi. The National Coordinating Body for Audit and Accountability (ESOEL)

No developments regarding the functioning of the National Coordinating Body for Audit and Accountability. ESOEL met regularly during 2025.

vii. Cooperation with EPPO

NTA cooperation with EPPO includes:

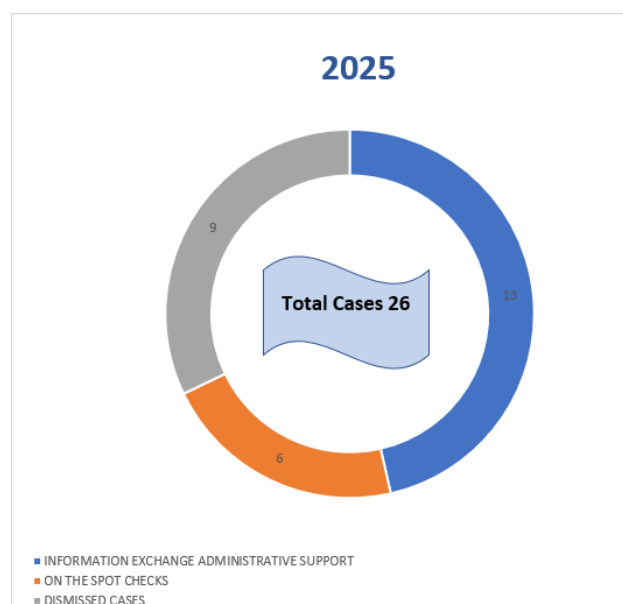
- Exchange of information & documentation. The AFCOS office identifies and informs EPPO of all cases pending that relate to criminal offences falling within the competence of EPPO.
- NTA's Inspection and Audit Unit provides scientific support & technical expertise to EPPO investigations

During 2025, no case was initiated or was pending on cooperation between NTA and AFCOS.

viii. Co-operation with OLAF

The Independent Fraud Coordination Department (AFCOS) for the year 2025:

- Took up 26 cases
- Undertook 28 actions on these cases, which are analysed below:
 - Provision of Information/Administrative Assistance in a total of 13 requests/actions
 - 6 coordinating actions for conducting on-site inspections, organizing operational meetings, etc.
 - Completion of investigation/closure of case, a total of 9 actions/cases.



ix. MOUs

During 2025, NTA signed two (2) MoUs, namely with the United Arab Emirates Accountability Authority and the Independent Commission Against Corruption Hong-Kong, in order to strengthen cooperation by exchanging know-how and expertise in the fields of integrity and transparency, as well as to develop initiatives to enhance integrity mechanisms and to mitigate risks related to corruption and fraud.

c. The Independent Authority for Public Revenue (IAPR)

i. Liability of IARP employees

The legal framework provides for the imposition of administrative, civil, and criminal penalties and sanctions in cases of corruption.

Criminal liability of employees of the IAPR arises when an act or omission constitutes a violation of criminal law provisions and falls within the definition of a criminal offence. According to the Penal Code (Law 4619/2019, OG A' 95), offences related to corruption include, indicatively, fraud (Article 386), breach of duty (Article 259), and bribery (Article 235).

Administrative penalties and sanctions are imposed in accordance with the provisions of the Civil Servants' Code (Law 3528/2007, OG A' 26), which governs disciplinary proceedings.

Indicatively, breaches of disciplinary law may constitute the following disciplinary offences:

- Article 107(1)(h) of the Civil Servants' Code (CSC): Breach of the obligation of confidentiality, in accordance with Article 26(1): "The civil servant must maintain confidentiality with respect to matters classified as confidential under the provisions in force. The civil servant must also maintain confidentiality whenever this is required by common experience and logic, regarding events or information of which he or she becomes aware in the performance of official duties."
- Article 107(1)(c) CSC: Breach of duty as defined by the Penal Code or other specific criminal legislation.
- Article 107(1)(d) CSC: Acquisition of financial or other benefits in the performance of official duties, for the benefit of the civil servant or a third party.

Thus, a breach of confidentiality entails the following disciplinary penalties:

- a. Definitive cessation of the civil servant's duties (Article 109(1)(h) CSC);
- b. Temporary cessation of the civil servant's duties for a period from three (3) to twelve (12) months, with deprivation of wages (Article 109(1)(g) CSC);
- c. Relegation by up to two (2) grades (Article 109(1)(f) CSC);
- d. Suspension from managerial duties (Article 109(1)(e) CSC);
- e. Suspension of the right to participate in evaluation procedures for a period of up to five (5) years (Article 109(1)(d) CSC);
- f. Suspension of the right to promotion for a period of up to five (5) years (Article 109(1)(c) CSC);
- g. Imposition of a fine of up to twelve (12) months' wages (Article 109(1)(b) CSC);
- h. Written reprimand (Article 109(1)(a) CSC).

The Governor is the competent authority to refer the accused civil servant to the Disciplinary Body. Prior to the imposition of the above disciplinary penalties, administrative measures may be taken against the accused civil servant for reasons of public interest, with the aim of removing the civil servant from the performance of duties until the charge is either confirmed or overturned. Such measures include:

- Suspension from duties for a period of two (2) months, imposed prior to the issuance of the Disciplinary Board's opinion on suspension (Article 104(2) of the Civil Servants' Code);
- Potential suspension, imposed following the opinion of the Disciplinary Board and lasting for a maximum period of up to two (2) years (Article 104 of the Civil Servants' Code);
- Compulsory suspension, imposed without the prior opinion of the Disciplinary Board [Article 103 of the Civil Servants' Code; Article 56(1) of Law 2065/1992, OG A' 113].

ii. Independent Integrity Advisor's Office

By virtue of Decision No. Δ.ΟΠΓ.Α 1022991 ΕΞ 2023/15-02-2023 (OG B' 1059) of the Governor of the IAPR, the Independent Integrity Advisor's Office was established within the Authority, effective as of 6 March 2023, reporting directly to the Governor.

The Office was established with the aim of strengthening integrity mechanisms within the Authority, ensuring an effective framework for the protection of employees who wish to report incidents of integrity violations or corruption, irregular conduct, and workplace bullying, as well as providing support, information, and guidance to employees on matters of ethics and integrity in the workplace.

iii. Risk Register

As of mid-2026, the IAPR will have in place a Risk Register and an Integrated Risk Management Information System, through which it will monitor and manage risks pertaining to the Organization.

iv. General Directorate of the Financial Crime Investigation Unit (GD SDOE)

The General Directorate of the Financial Crime Investigation Unit of the General Secretariat for Tax Policy of the Ministry of National Economy and Finance was incorporated into the Independent Authority for Public Revenue (IAPR) pursuant to the provisions of Law 5222/2025 (OG A' 134), effective as of 6 October 2025. The incorporation was effected by virtue of Decision No. Δ.ΟΠΓ.Α 248060 ΕΞ 2025/3-10-2025 (OG B' 5302) of the Governor of the IAPR.

Subsequently, by Decision No. Δ.ΟΠΓ.Α 442713 ΕΞ 2025/16-12-2025 (ΟΓ Β' 6865), effective as of 16 March 2026, the Directorate was renamed the "General Directorate of Financial Transaction Control Forces" and was substantially reinforced through the transfer of tax and customs control units to its structure.

Within this unified operational framework, the General Directorate is responsible for the planning, coordination, and implementation of complex and targeted controls aimed at combating tax evasion, smuggling, fraud, and corruption.

The operation of the General Directorate is fundamentally based on cooperation. At the national level, it works closely with the Public Prosecutor's Office, the National Transparency Authority, the Hellenic Financial Intelligence Unit (FIU), the Hellenic Police, the Hellenic Coast Guard, and the Tax and Customs Authorities. At the international level, it maintains strong collaboration with the European Public Prosecutor's Office (EPPO), OLAF, Europol, Interpol, and numerous other agencies with similar competences.

Within its operational mandate, SDOE receives a high volume of prosecutorial orders to investigate economic and financial crimes, including cases of corruption. It conducts audits and preliminary investigative operations, and upon their completion, the findings—subject to the confidentiality of pre-trial proceedings—are forwarded to the competent Prosecutor for further action.

Pursuant to Article 20 of Law 4557/2018, as in force, SDOE has been designated as the competent authority for verifying the compliance and accuracy of the data recorded in the Central Beneficial Ownership Registry. In this context, a relevant Ministerial Decision has been issued to regulate specific aspects of the control and detection procedures concerning violations related to the registration and updating of beneficial ownership data of legal persons and entities in the Registry. As the competent audit mechanism for detecting violations related to the maintenance, adequacy, and accuracy of information recorded in the Registry on beneficial owners of legal persons and entities, SDOE has direct access to the Central Beneficial Ownership Registry. During the year 2025, the Financial and Economic Crime Unit conducted 547 relevant audits. In 88 cases, violations were identified, primarily due to failure to submit the required information or delays in submission. Consequently, administrative fines were imposed, amounting to a total of EUR 758,600.00€.

In conclusion, with the administrative subordination of the SDOE to the AADE, a unified and, above all, effective tax control mechanism has been established, combining the tax audits of the AADE and the financial crime investigations carried out by the former SDOE. In this way, the state mechanism for controlling corruption becomes more centralized and organized, reducing any overlaps and enhancing the flexibility and effectiveness of controls against tax evasion, black money, and smuggling.

v. The transfer of OPEKEPE to AADE.

With the provisions of the Articles 63-68 of the Law 5264/2025 (GG Α' 239), the Agency for the Payment and Control of Community Aid for Guidance and Guarantees (OPEKEPE) was also transferred to the AADE. All the responsibilities of the previously independent Agency, among them the control and payment of agricultural subsidies and aid, are transferred to the AADE, in order to ensure greater transparency, efficiency, and reliability in the way subsidies to farmers are paid and controlled, thanks to the robust control systems and modern digital infrastructure available to the independent administrative authority.

The new role that the AADE is called upon to play in ensuring transparency in public life and tackling maladministration, mismanagement, and corruption is significantly reinforced in terms of human resources.

As noted above, based on the annual recruitment plan for 2026 (Council of Ministers' Act No. 29/27.10.2025), the AADE is set to recruit 700 new employees from various sectors and specializations to support the implementation of its project and mission.

At the same time, in 2026, other Greek state audit bodies and institutions will also be reinforced with new staff (see the relevant table above).

2. Safeguards for the functional independence of the authorities tasked with the prevention and detection of corruption.

a. NTA's independence:

i. Governor

The open call for the appointment of the NTA governor has been completed in August 2025, following a parliamentary hearing. Ms. Alexandra Rogkakou was appointed Governor for a 5-year term (GG 997/6.8.2025).

ii. Management Board

The Management Board of the National Transparency Authority (GG 1142/14.10.2024) met regularly during 2025.

iii. Audit Committee

No further developments with regard to the Audit Committee²⁵. The Audit Committee met twice during 2025.

b. Public Prosecutor for Economic Crime

As noted above (under Pillar I – Justice), the Economic Crime Prosecutors express concerns regarding several structural and operational challenges affecting the effective investigation and prosecution of corruption and complex economic crime. These concerns relate, in particular, to the growing complexity of cases, which require extensive financial analysis, asset tracing, examination of transnational corporate structures and enhanced cooperation with EU bodies such as the EPPO and EUROJUST, significantly increasing the workload of specialised prosecutors. At the same time, understaffing of investigative services (e.g. the Directorate of Economic Crime Investigations and the Economic Police Directorate) continues to limit their ability to respond promptly to prosecutorial orders. Additional constraints arise from limited inter-agency operability, including the restricted capacity of certain authorities, such as the Independent Authority for Public Revenue, to execute prosecutorial investigation orders, despite their central role in processing financial data.

These justified concerns are being addressed through targeted measures and safeguards aimed at strengthening investigative capacity and ensuring continuity in the execution of prosecutorial orders. We have already mentioned (under Pillar I – Justice) the shortened training period at the National School of the Judiciary for trainee prosecutors, allowing them to assume prosecutorial duties at the earliest possible stage, as well as the planned increase of 50 prosecutorial positions. Both measures were adopted following proposals from the prosecutorial authorities.

Further, in this context, notwithstanding the institutional integration of the former Financial and Economic Crime Unit (SDOE) into the Independent Authority for Public Revenue (AADE), Article 254 of Law 5222/2025 expressly preserved the competence of former SDOE officers to conduct criminal investigations following orders issued by the Economic Crime Prosecutor. This safeguard ensured the continuity and completion of significant ongoing investigations, avoiding procedural disruption during the transition period, particularly in cases involving projects financed through national and European Union funding schemes, thereby contributing to the protection of national and EU financial interests.

Moreover, the envisaged Digital Registry for the Monitoring of Corruption Cases, as described above, is expected to provide significant support in the fight against corruption. Once implemented, the registry will provide structured information on both the progress of investigations and on criminal prosecutions brought in corruption-related cases, thereby supporting more reliable data collection and evidence-based assessment of enforcement efforts.

²⁵ The committee acts as an independent and impartial body, with the responsibilities of article 8 of Law 4795/2021 and ensures the functional independence of the Internal Audit Unit.

Furthermore, as mentioned above regarding the 2026 Annual Recruitment Plan, further measures include the recruitment of more than 900 new civil servants to be deployed to auditing and supervisory independent authorities, including the Independent Authority for Public Revenue (AADE), the National Transparency Authority (EAD), the Authority for Combating Money Laundering, and the Hellenic Competition Commission.

Finally, with a view to strengthening anti-corruption control mechanisms and establishing a more effective overall system, additional initiatives and measures, as outlined in this Pillar II, are also being pursued.

3. Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators.

a. Update on the National Anti-Corruption Action Plan (NACAP)

It should be reminded that NACAP 2022-2025 design and monitoring methodology has been recognised as a good practice by the Commission (DG HOME).

The process of designing and monitoring the new NACAP 2022-2025 is considered a good practice because it is the first time in the history of Greek NACAP (since 2013) that in the process of designing, the main stakeholders are actively involved. More than 44 meetings took place with 24 stakeholders during the second semester of 2021, with the participation of public policy stakeholders and representatives from the private sector and civil society. Another innovative element in NACAP 2022-2025 is the development of a comprehensive set of output and results indicators that will allow the NTA to measure/quantify the outcomes and the impact of the intervention (see the Handbook of good practices in the fight against corruption²⁶).

i. NACAP 2022-2025

Preventing and combating corruption is one of the Greek state's key priorities, as reflected in the "National Anti-Corruption Strategy 2022-2025", which constitutes the country's national strategy for a coherent framework of actions, interventions, and projects aimed at preventing and addressing corruption phenomena, strengthening transparency, integrity, and accountability, and systematically informing and raising public awareness on corruption-related issues (see Law 4915/2022, GG A' 6327).

NACAP includes a set of 148 actions to detect, prevent and raise awareness against corruption in Greece. According to the S1 2025 monitoring report (June 2025):

94 actions had been completed

50 actions were on-going

14 actions had not been implemented

NTA is currently drafting the final monitoring report for S2 2025. According to NTA's unofficial projection, the closure scenario of NACAP 2022-2025 demonstrates that approximately 80% of actions included in the Strategy have been successfully implemented (120 actions completed).

NTA in co-operation with the competent ministries and policy bodies will assess the relevance and added value of the remaining actions especially those that have not materialized. Most of the on-going actions are expected to be transferred in the next Strategy to ensure continuity of anti-corruption reforms.

Furthermore, during 2025, a national corruption risk assessment based on qualitative and quantitative data from various sources took place in 3 levels:

- Level 1: 22 policy areas were identified, and relevant risk factors were developed. Then, an assessment of the level of corruption risk in terms of impact and probability. The exercise

²⁶ <https://www.marinacastellaneta.it/blog/wp-content/uploads/2023/02/Handbook.pdf>

²⁷ <https://ia37rg02wpsa01.blob.core.windows.net/fek/01/2022/20220100063.pdf>

produced a color-coded classification (green - low risk, orange – medium risk -red – high risk) that offers a comparative overview allowing us to identify policy fields most prone to corruption phenomena.

- Level 2: In depth analysis of each policy area. We examined progress reached, the status quo and field specific challenges that need to be addressed. As a result, sectoral priorities were identified, reflecting both systemic weaknesses and opportunities for improvement.
- Level 3: Building on the findings 22 thematic brief notes were drafted, summarizing key findings, priorities and indicative actions. Finally, these briefings were disseminated to competent policy actors and paved the way for an evidence-based consultation process.

In Q3 2025 NTA launched a broad participatory consultation process with all interested parties including the private sector NGOs and the Academia.

In Q3 2025 NTA initiated an independent external evaluation of NACAP 2022-2025. The final evaluation report is expected in February 2026.

ii. Towards NACAP 2026-2030

The Strategy for the period 2026-2030 is under consultation. The new NACAP builds on lessons learnt from the implementation of previous strategies, international good practices and internal and external evaluation findings as well as national priorities. The Strategy is expected in Q2 2026 after its approval by the Ministerial Council.

b. Ministry of Interior's initiative: The working groups for the simplification of administrative procedures in the National Register of Administrative Procedures - "Mitos"

As part of the implementation of actions under the existing National Strategic Plan for Combating Corruption 2022-2025, three (3) separate working groups were set up (GG 2 Y.O.D.D./9.1.200628) with the main task of evaluating, simplifying, standardising and digitising selected administrative procedures in specific thematic areas where there is a high probability of such phenomena occurring.

Each of these working groups consists of executives from the General Directorate of Administrative Procedures of the Ministry of Interior, as well as employees from administrative procedure simplification units of other ministries (Ministries of a. Social Cohesion and Family, b. Labor and Social Security, and c. Rural Development and Food), as well as experienced executives from the National Transparency Authority, with the aim of amending and ultimately improving the administrative framework in areas such as the payment of agricultural subsidies and the granting of the Minimum Guaranteed Income (MGI).

The task of these groups is to record the existing administrative procedures in the National Register of Administrative Procedures - "Mitos", as well as to evaluate them in order to draw up proposals for simplification, standardization, and digitization. Each group will deliver a draft ministerial decision with provisions for the simplification, standardization, and digitization of the above administrative procedures, in conjunction with the strengthening of transparency and accountability safeguards during their implementation.

²⁸ relevant link: <https://ia37rg02wpsa01.blob.core.windows.net/fek/14/2026/20261400002.pdf>

D. Prevention

1. Measures to enhance integrity in the public sector in particular as regards high-level officials (including as regards incompatibility rules, revolving doors, codes of conduct, ethics)

a. The Codes of Conduct:

Regarding the measures to enhance integrity in the public sector in particular as regards high-level officials (including as regards incompatibility rules, revolving doors, codes of conduct, ethics):

i. The Code of Conduct for the Seconded Officials and Special Advisors was published in December 2024 on the website of the National Transparency Authority (NTA) in the following link: <https://aead.gr/images/manuals/kodikas-deontologias-metaklhtwn-ypallwn.pdf>.

Furthermore, the code is published on the websites of the Ministry of Interior (<https://www.ypes.gr/>) and the Presidency of the Government (<https://gslegal.gov.gr/kyvernisi/nomothetiko-plaisio/>).

The Code of Conduct for the Seconded Officials and Special Advisors contains a requirement to submit a declaration on their prior professional activities within one month of taking up their duties, and a declaration on their intended post-government activities upon the termination of their duties.

In addition, for twelve months after leaving public office, they are required to seek authorisation of the Ethics Committee in respect of any professional or business activity relating to the entity to which they have been appointed, if it could create a conflict of interest.

ii. The Code of Conduct for Members of the Government, Deputy Ministers, and General and Special Secretaries is published on the website of the General Secretariat of Legal and Parliamentary Affairs, completing the regulatory framework for the organization and functioning of the government, at the following link: <https://gslegal.gov.gr/kyvernisi/nomothetiko-plaisio/>.

Under the auspices of the Presidency of the Government, each member of the Government and Deputy Minister has received an electronic copy of this Code. It should be noted that the Code has been presented to the Members of the Government at a meeting of the Council of Ministers prior to its publication. The Code of Conduct for Members of the Government contains the same above mentioned requirements with these of the Code of Conduct for the Seconded Officials and Special Advisors

iii. The General Secretariat for Legal and Parliamentary Affairs is developing a dedicated section on its website on transparency and integrity, which is almost completed and will provide consolidated access to all applicable Codes of Conduct and related transparency obligations, including those concerning conflicts of interest and the acceptance of gifts.

b. Update on the operation of Ethics Committee within National Transparency Authority.

Articles 68-75 of Law 4622/201929 on the organization, operation, and transparency of the Government, government bodies and central public administration set out rules on disqualifications, incompatibilities and general rules for avoiding conflicts of interest between members of the government, deputy ministers, general and special secretaries of ministries, public sector administrative bodies, and civil servants. These regulations include the establishment of an Ethics Committee within the National Transparency Authority, whose main task is to deal with any cases involving issues of ethics and conflicts of interest involving government members or senior administrative officials and civil servants.

Since its establishment in 2021, the NTA (EAD) Ethics Committee has dealt with a total of 24 cases—seven (7) of which during 2025—and has issued a corresponding number of decisions on cases of

conflict of interest or lack thereof³⁰. Specifically, in 2025, the Ethics Committee has handled seven (7) cases (relevant Decisions 18-24/2025) dealing with Article 73 par. 2 of Law 4622/2019 on the required permit for applicants to pursue a professional activity in the private sector related to the activity of the public body to which they were appointed and which may create a situation of conflict of interests, provided that less than one year has elapsed since the cessation of their duties. The Committee decided to grant the applicants the requested authorization to carry out their professional activities as specified in their applications for three (3) of the applications while one (1) application was rejected as unfounded. The Committee didn't grant the authorization for three (3) applications³¹. On NTA's website instructions are available for interested parties to submit online applications³² and/or complaints³³ to the Ethics Committee.

c. Standard Operating Regulation for the Audit Committee of Higher Education Institutions (HEIs)

The National Transparency Authority, within the scope of its responsibilities for the development and monitoring of the Internal Control System in the public sector, published a Standard Operating Regulation for the Audit Committee of Higher Education Institutions (HEIs). This Standard systematically records the responsibilities provided in Law 4795/2021 for Audit Committees and defines the framework for cooperation with the Internal Audit Unit, with the aim of facilitating their work to strengthen the independence, integrity, and effectiveness of internal audit in Higher Education Institutions.

It should be noted that the Rules of Procedure of each Audit Committee are drafted by the Committee itself and approved by the Head of the HEI (Article 79 para 2 of Law 4795/2021).

d. Operating Regulation for Audit Committee of the Independent Authorities

The National Transparency Authority, within the scope of its responsibilities for the development and monitoring of the Internal Audit System in the public sector, published the Standard Operating Regulation for the Audit Committee of Independent Administrative Authorities.

The document systematically records the responsibilities provided for in Law 4795/2021 for Audit Committees and defines the framework for cooperation with the head of the Authority and the Internal Audit Unit, with the aim of facilitating their work to strengthen the independence, integrity, and effectiveness of the Authority's internal audit.

As already noted, the Rules of Procedure of each Audit Committee are drafted by the Committee itself and approved by the Head of the Authority (Article 79(2) of Law 4795/2021).

e. Internal Audit

NTA published a report, entitled "Report on the implementation of Part A of Law 4795/2021 on the Internal Audit System in Public Sector Bodies".

The report highlights progress reached, good practices, and points out challenges and areas for improvement, contributing to the development of a modern and effective Internal Control System.

The report includes 11 findings, and 25 recommendations addressed to the competent bodies, five of which concern legislative provisions seeking to strengthen accountability and transparency mechanisms in the public administration.

f. Internal Audit Platform

The RRF-funded project "Internal Audit Platform" is ongoing. The preparatory study was submitted in October 2025 and the project is implemented accordingly. The platform is expected to be fully operational at the end of March 2026.

³⁰ <https://aead.gr/nta/epitropi-deontologias/apofaseis/>.

³¹ More information on cases available: <https://aead.gr/nta/epitropi-deontologias/apofaseis/>

³² <https://aead.gr/deontologia-aitisi-xorigisis-adeias/>

³³ <https://aead.gr/complaints-deontologia/>

The platform provides for the main mechanism for coordination, information and support of stakeholders and users, while it simultaneously is a centralized knowledge repository, gathering and allowing the processing of content, data and information. The heads and executives of the Internal Audit Units will have the right to register, while the system will be managed by an organizational unit of the NTA. Users of the information system will be able, inter alia, to:

- be informed about developments in matters related to Internal Control and the work of the Policies and Procedures and Standards Policy and Procedures Unit
- be informed about planned training/events on issues related to the implementation of the Internal Audit Standards and related policies and procedures.
- receive training/information material in digital format; and
- express their questions to the IAS staff through communication forms.
- submit reports and annual action plans

g. Certification Schemes on Integrity, Internal Audit and Risk Management

In cooperation with the Ministry of Interior and the National Center for Public Administration and Local Government (EKDDA), NTA has designed and has an active role in the implementation of the "Certification Program for Internal Auditors of the Public Sector". Through the Certification Program, participants acquire knowledge, skills and competencies required to effectively perform the duties of an internal auditor.

In 2025, five (5) training cycles were successfully completed, out of the total of thirty (30) that have been held since 2021. More specifically, in 2025 (as of October 2025) 89 internal auditors from various public sector entities, have been certified, while 106 have participated in the relevant training. In total, of the 606 trainees who participated in the Certification Program, 589 have been certified.

Four (4) cycles of Certification of Professional Competence of Integrity Advisors were completed within 2025, resulting in the certification of 239 public officials since the beginning of the training.

Three (3) cycles of Certification of Professional Competence of Risk Managers were completed within 2025, resulting in the training of 73 public officials.

Training of public officials in specialized teaching modules aimed at promoting transparency, accountability, and integrity in the National Centre for Public Administration and Local Government (EKDDA), following and adopting a proposal of NTA (indicative seminars: Heads of Departments and Directorates, and newly recruited public officials.).

2. Measures to enhance general transparency of public decision-making (including rules on lobbying, asset and interest disclosure rules, gifts policy, transparency of political party financing).

a. Lobbying

i. As noted above, under the relevant recommendation, the Transparency Register for lobbyists/interest representatives under Article 8 of Law 4829/2021, in the first half of 2026 and as part of the general reform of the National Center for Public Administration and Local Government, the "Leadership Academy" that is to operate within it, awareness-raising and information activities for government members, deputy ministers, and general and special secretaries of ministries and their private offices are being planned jointly with the National Transparency Authority (NTA).

In co-operation with the Ministry of the Interior Raising Awareness, NTA is designing actions to disseminate information to institutional actors obliged to submit an annual declaration. The launch of the campaign (first RA event) will take place in S1 2026 targeting members in the Cabinet of line Ministries. The roll out of the RA campaign will take place in S2 2026.

ii. Within the framework of the project "23EL27 – Promoting the Transformative Change of the Hellenic National Centre for Public Administration and Local Government (HNCPALG)", which started in October 2023, the Ministry of Interior, in cooperation with the Hellenic National Centre for Public Administration and Local Government (EKDDA) and Expertise France, and with funding from the Reform and Investment Task Force (SG REFORM) of the European Commission, is implementing interventions with

the overall objective of modernising EKDDA. This is pursued through the enhancement of its institutional role, its operational model, and the quality of the training programmes it provides.

In this context, a pilot informational action is being organised on lobbying / influence activities and the operation of the Transparency Register. This action is part of the trial implementation (“stress test”) of new educational content, with an emphasis on the needs of senior officials and the future operation of the Leadership Academy.

The action is scheduled for March 2026 and will take place in person at the premises of EKDDA, with the possibility of simultaneous online attendance.

The briefing is addressed to the Offices of Ministers, Deputy Ministers, General and Special Secretaries, Administrative Secretaries, as well as appointed Integrity Advisors (the expected audience is estimated to exceed 150 participants), with the aim of strengthening understanding of the institutional framework, obligations, and procedures related to influence activities.

The thematic areas of the action will indicatively cover:

- the purpose and operation of the Transparency Register,
- basic concepts and definitions (interest representative, influence activity – what it includes and what it does not),
- the obligations of institutional actors and the sanctions provided for,
- the procedures to be followed in the event of a request for or the holding of a meeting with interest representatives,
- practical examples,
- as well as the annual declaration and a simulation of its submission in a test environment.

b. The Central Audit Committee and the declarations of assets:

i. The institutional framework:

Greece had fulfilled all obligations early enough and there were no recommendations related to political money and assets, regarding the Rule of Law Report.

Therefore, in 2025, the Central Audit Committee’s attention focused on the further implementation of the legislation and the overall improvement of submission and control procedures, to enhance the anti-corruption framework with emphasis on prevention, deterrence, detection, investigation, and repression. The Central Audit Committee (CAC) oversees the institutional framework and implements the policies for combating corruption in the areas of (a) political money for political parties, advertising and polling companies and political figures (MPs and MEPs), as well as (b) disclosure of illegal financial interests and illicit enrichment for natural persons managing public money.

In 2025 continuing the implementation of the new law on asset declarations several steps were taken forward in organizing procedures to meet the laws standards including additional safeguards added for extra transparency, while at the same time ensuring proper compliance with the provisions for the control of party finances.

ii. The Electronic Submission System:

In 2025, the possibilities of the new electronic submission system were utilized on multiple levels by the coordinator, supervising and creating control criteria and internal indicators for measuring the overall quality of the work, according to the provisions of the law in all its dimensions: supervision, coordination, and accountability. The above was integrated through the functioning of the Commission and coordination, the utilization of the system by users of all kinds, the preparation of the registers of submitters, the procedures for submission, publication and control of statements and the imposition of sanctions when required. In particular:

a) In 2025, the new electronic system was used in total for eight registered functions by 1,284,901 unique users, compared to 521,484 in 2024. The functions may have concerned the submission of a declaration, catalogues of obligates or complaints, reading notifications, uploading contracts or documents, or simply browsing the system. These large numbers indicate, on the one hand, that the persons related to the asset declaration system are becoming more and more familiar with the system and, by extension, with the application of the new law. But on the other hand, the penetration that the new system has in the culture of a social subset of those interested in the asset declarations.

b) In 2025, the regular submission of three years was completed (uses 2022, 2023, 2024), leading to a total number of submissions of around 900,000 declarations.

c) For the first time in 2025, an additional check with electronic intersections and red flags at the Coordination level, based on criteria as provided by law, was started on a trial basis, in all the declarations that are submitted. This allowed for better oversight and overall supervision resulting to increased audit output, as described below.

iii. The operation of the Central Audit Committee

Please see our answer below on Repression of Corruption.

c. Audits conducted by the Asset Declarations Audit Department of the Directorate of Economy and Development (Inspections and Audits Unit/NTA)

In 2025, seventy (70) complaints were investigated, and twenty-six (26) audits were completed.

The audits revealed the following:

- a) in six (6) cases, the auditees were performing private work/tasks without a permit from the Service, in violation of the relevant provisions.
- b) Five (5) auditees had submitted inaccurate asset declarations, as they had not included in their submissions, in each case, cumulative or separate assets they had acquired, specifically: available balances in bank accounts (5 cases), mutual funds (1 case), insurance contracts (1 case), ownership of a motorcycle (1 case).
- c) in one (1) case, the audited person had not submitted an initial declaration (assumption of duties).
- d) in one (1) case, the audited person held a 50% stake in a commercial IKE company.
- e) in one (1) case, the auditee was performing private work at a time when he was supposed to be at work.
- f) in one (1) case, the auditee owned a public service vehicle (TAXI) without meeting the legal requirements.
- g) In eight (8) cases, deposits totalling €515,684.83 were found in the auditees' bank accounts, which were not justified by legal and apparent income.
- h) In two (2) cases, the audited persons had purchased a car or motorcycle without this purchase being justified by apparent sources.
- i) In four (4) cases, the family expenses of the audited persons were not covered by apparent sources.

In all of the above cases, the relevant reports were forwarded to the competent disciplinary authority for disciplinary proceedings against the officials involved and for officials who were found to have submitted inaccurate Asset Declarations or had unjustified property increases, the audit reports were forwarded to the Athens Public Prosecutor and the General Commissioner of the State Audit Office for the necessary actions to be taken to recover the unjustifiably acquired amounts, since, according to case law. Furthermore, in all cases where unjustified resources were identified, the audit reports were forwarded to the competent audit services of the Independent Authority for Public Revenue for the taxation of the unjustified resources identified, which are treated for tax purposes as profits from business activities.

d. Gifts policy

In accordance with the provision of Part B' of Law 4829/2021(Gift policy), a list with the gifts offered to the members of the Government and the Deputy Ministries is uploaded on the Presidency of Government website.

The Presidency of Democracy uploads on an annual basis a detailed List of Gifts received.

Thus, during 2025, a list was compiled of gifts offered to members of the government throughout 2024³⁴. A similar list has been compiled for gifts received by the President of the Republic³⁵.

e. The regulatory initiative of the Ministry of the Interior to take additional measures to implement Regulation (EU) 2024/900 on transparency and targeting in political advertising

Apart from the "gift policy" to members of the Greek Government and the President of the Republic, in order to enhance overall transparency in political life, the Ministry of the Interior (MoI) is taking immediate regulatory action to adopt additional measures to implement Regulation (EU) 2024/900 on transparency and targeting in political advertising. Regulation (EU) 2024/900 entered into force in March 2024 and, following the adoption of its implementing Regulation (EU) 2025/1410 in October 2025, is now fully applicable. Its provisions aim, among other things, at the clear identification of political advertisements, disclosure of the funder of each political advertisement, as well as the amount spent, the imposition of strict restrictions on targeting sensitive personal data, such as political beliefs, ethnic origin, etc., and prohibiting interference from non-EU countries during election periods. These objectives have led to the creation of two central electronic portals, the first of which is used by each Member State to enter the dates of all elections (national or local), and the second is where the legal representatives of political advertising service providers established outside the EU enter the dates of all elections (national or local).

The regulatory initiative of the MoI will be undertaken in the immediate future in the form of secondary legislation. The provisions of the relevant Presidential Decree will specify the competent administrative bodies and authorities that will exercise a number of powers to implement the Regulation, such as keeping registers of all legal representatives of political advertising service providers established in Greece. At the same time, the Presidential Decree will designate the Election Directorate of the Ministry of the Interior as the National Contact Point of the Greek State for the effective implementation of the provisions of Regulation (EU) 2024/900. In order to finalize the provisions of this Presidential Decree, the MoI is working in cooperation with the relevant Independent Authorities, specifically the National Telecommunications and Post Commission and the National Broadcasting Council.

f. Presidential Decree 15/2022 (GG A'2936), which codified the legislation in force at the time on the financing of political parties:

According to this regulation, the control of political party funding sources is carried out by the "Control Committee" of Article 25 of Law 5026/2023 (GG A'4537), to which complaints about possible violations of the relevant legislation are forwarded and, after examining them, has the power to impose sanctions. At the same time, in order to reinforce the principles of transparency, the Audit Committee publishes on its website every relevant decision, finding, or penalty it imposes, making them directly accessible to citizens (<https://epitropielegxou.parliament.gr/>). At the end of each year, it submits a report on its activities to the Parliament's Committee³⁸ on Institutions and Transparency and to the Ministers of Finance and the Interior. The annual report on 2025 is expected to be published on March 2026.

³⁴ <https://govpresidency.gov.gr/wp-content/uploads/%CE%97%CE%BB%CE%B5%CE%BA%CF%84%CF%81%CE%BF%CE%BD%CE%B9%CE%BA%CF%8C%CF%82-%CE%9A%CE%B1%CF%84%CE%AC%CE%BB%CE%BF%CE%B3%CE%BF%CF%82-%CE%AD%CF%84%CE%BF%CF%85%CF%82-2024.pdf>.

³⁵

<https://www.presidency.gr/wpcontent/uploads/2025/02/%CE%9A%CE%B1%CF%84%CE%AC%CE%BB%CE%BF%CE%B3%CE%BF%CF%82-%CE%94%CF%8E%CF%81%CF%89%CE%BD-%CE%A0%CF%84%CE%94-2024.pdf>

³⁶

https://www.kodiko.gr/nomologia/download_fek?f=fek/2022/a/fek_a_39_2022.pdf&t=78fe4e176077e25cb74f16bdbb20f1fd

³⁷

https://www.kodiko.gr/nomologia/download_fek?f=fek/2023/a/fek_a_45_2023.pdf&t=c9e754d7f874c37a64f0bd a8c76c70ad

³⁸ <https://epitropielegxou.parliament.gr/%CE%97-%CE%95%CF%80%CE%B9%CF%84%CF%81%CE%BF%CF%80%CE%AE>

3. Measures to prevent conflicts of interest in the public sector. Please specify the features and scope of their application (e.g. categories of officials concerned, types of checks and corrective measures depending on the category of officials concerned).

→ For the three previous points, please also provide information and figures on their application/enforcement, such as number of detected breaches/irregularities of the various rules in place and the follow-up given (investigations, sanctions, etc.).

a. Regarding the measures to prevent conflicts of interest in the public sector:

As part of a broader effort to strengthen the framework for the prevention of conflicts of interest, the General Secretariat for Legal and Parliamentary Affairs is reinforcing the system for the submission of declarations of conflict of interest, as provided for in Prime Minister's Decision No. Y150/2019 on the "Definition of procedural obligations for the avoidance of conflicts of interest".

Furthermore, Article 72 § 4 of Law 4622/201939 is in the process of being amended, in order to transfer the decision-making authority for the management of conflicts of interest of persons entrusted with top executive functions from the Prime Minister to the General Secretariat for Legal and Parliamentary Affairs. The amendment will enter into force by the end of February 2026.

b. Ethics Committee

Please, see above our answer under the title "Ethics Committee".

4. Measures to ensure whistleblower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given).

a. Legal Framework for Whistleblower Protection in Greece

As noted in our second contribution last year (following targeted questions), Greece has established a robust legal framework for protecting whistleblowers (public interest witnesses) from retaliation. To avoid repetition, the key legislative provisions are summarized below:

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

ii. Law 4990/2022 (Art. 18): Incorporating EU Directive 2019/1937, this law ensures that whistleblowers bear no liability for acquiring or disclosing information and are protected from related legal actions.

iii. 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, and transfer or reassignment of public servants outside standard procedures.

iv. Code of Criminal Procedure (Art. 47): Provides immunity from prosecution for offences such as perjury or defamation when committed in the context of whistleblowing, subject to approval by specialized prosecutors.

v. Civil Service Code (Law 3528/2007): (i) Art. 26(4): Whistleblowers cannot be excluded from promotion, subjected to disciplinary action, or treated unfavorably in career advancement, (ii) Art. 110(6): If disciplinary action is taken against a whistleblower, the disciplinary body must prove that it is unrelated to the whistleblower's contribution.

Protected status may only be revoked if a judicial authority determines that the conditions for its grant are no longer met (Law 4254/2014; Art. 47 of Law 4620/2019; Art. 218(7) of the Code of Criminal Procedure).

³⁹ Article 72 para 4: "4. By decision of the Prime Minister, issued following a proposal by the Secretary General for Legal and Parliamentary Affairs and published in the Official Gazette, the details for the implementation of this Article may be specified."

b. The Integrity Advisor

The provisions of Law 4795/2021 (GG A 62) introduced the institution of the Integrity Advisor to the public sector, whose main mission is to ensure a coherent framework for the effective protection of employees who identify, suffer the consequences of, or wish to report breaches of integrity, as well as to provide support, information, and advice to them on issues of ethics and integrity in their workplace. The provisions of the law provide for the establishment of an Independent Integrity Advisor Office in each Ministry, with the exception of three Ministries, but also the possibility of establishing such an Office in other public bodies. According to Article 28 of Law 4795/2021, the position of Integrity Advisor is filled following a call for expressions of interest issued by the National Transparency Authority.

By early 2026, Integrity Advisors have been appointed and have taken up their duties in a total of nine (9) ministries, namely: a. Interior, b. Justice, c. Development, d. Migration and Asylum, e. Infrastructure and Transport, f. Social Cohesion and Family, g. Environment and Energy, h. Culture, and i. Education, Religions, and Sports.

In all other ministries where no Integrity Advisor has been appointed to date, the duties are performed by the Responsible Receiver and Monitor of Reports (RRMO), in accordance with the relevant provisions of Law 4990/2022 (No. 210) on the protection of persons reporting breaches of EU law.

c. Art. 114 of Law 5193/2025 for the implementation of Regulation (EU) 2023/1114 of the European Parliament and of the Council of May 31, 2023, on markets in crypto assets:

The provisions of this law broaden the scope of Article 4 of Law 4990/2022 (A' 210/11.11. 2022) on the protection of persons who report or disclose infringements of Union law, so that its protective scope also covers persons who report or disclose infringements in the field of cryptocurrency markets.

d. Transportation of Directive (EU) 2024/1226 of the European Parliament and of the Council of 24 April 2024 on the definition of criminal offenses and penalties for infringing Union restrictive measures - Law 5232/2025:

The provision of Article 9 of the above Law added paragraph e) to Article 4 of Law 4990/2022, so that its protective provisions for persons reporting violations of EU law also include those reporting violations of EU restrictive measures, while with the provision of Article 15 of the same Law the criminal offense in question was included in the basic offenses of money laundering provided for in Article 4 of Law 4557/2018.

e. Code of Ethics

A Code of Ethics for officers who receive and follow up on whistle-blower reports in the public sector (law 4990/2022 GG A' 210) is expected to be published in S1 2026.

f. Data on the number of reports

According to NTA, as of 30/12/2025, a total of 74 reports were submitted, of which 8 reports (11%) are currently under examination by the competent inspectors.

5. Specific measures to enhance transparency, integrity and accountability in sectors with high risks of corruption, with a view to monitor and prevent corruption and conflict of interests, and where applicable measures to prevent and address corruption committed by organised crime groups.

a. Public Procurement – The Law 5218/2025(GG A 125⁴⁰) on the reform of the framework for the professional training of employees handling public contracts, the framework for the preparation and award of public contracts, and legal protection in the field of public contracts:

⁴⁰https://www.kodiko.gr/nomologia/download_fek?f=fek/2025/a/fek_a_125_2025.pdf&t=a3576f946308f8f87745dc371f6ee117

Pursuant to the provisions of Law 5218/2025(GG A' 125), targeted amendments were introduced to the public procurement legal framework, with the aim of simplifying and streamlining procedures, while strengthening transparency, integrity and procedural efficiency.

The provisions of Part A (Articles 1 to 8) regulate issues relating to the professional training and certification of employees in the field of public procurement, while the provisions of Part B (Articles 9 to 34) regulate issues relating to the preparation, award, and legal protection in the field of public procurement and amend specific provisions of Law 4412/2016. In particular:

i. The establishment of the Committees for the examination of self-corrective measures:

Article 73 para 9 of Law 4412/2016 was amended and two Committees for the examination of self-corrective measures were established by decision of the competent Minister, on a distinct basis:

a. a committee for the examination of self-corrective measures for public supply and service contracts and

b. a committee for examining self-cleaning measures for public works contracts, studies and technical and other related scientific services, with the participation of the Hellenic Single Public Procurement Authority (HSPPA) and the competent Ministries.

ii. An increase in Hellenic Single Public Procurement Authority staff (advisors and members)

In order to accelerate the provision of legal protection, the staff of the HSPPA (Counsellors and Members) was increased, allowing for the establishment of two additional Chambers/Panels, with a view to reducing the length of proceedings and accelerating the examination of pre-contractual remedies.

More specifically:

- In November 2025, four (4) new members were appointed to the Authority (GG Y.O.Δ.Δ. 1531/24.11.2025)

- In December 2025, two (2) new Counsellors were appointed to the Authority (GG Y.O.Δ.Δ. 1683/30.12.2025).

As of 31 December 2025, the Authority consisted of the President, twelve (12) Counsellors, and thirty-three (33) members, out of the thirty-four (34) members provided for under Article 348(1) of Law 4412/2016, as amended by Article 21 of Law 5218/2025.

ii. Professionalization of Public Procurement:

The new legal framework (Law 5218/2025) provides incentives to attract and retain skilled human resources in public procurement. Furthermore, capacity building through training and awareness-raising initiatives is also continued. To this end:

- The National School for Public Administration embedded the tools developed through the TSI project on enhancing transparency and integrity into the training modules for the certification of public procurement officials and risk managers (for more info on the project please see the 2024 RoL contribution).
- In addition, a new Department specialized in Public Procurement is established within the National School for Public Administration to equip (future) public officials with specialized and professional training in public procurement.

In this context, and more specifically for the professional training of employees working in the field of public procurement, the Ministry of the Interior, in cooperation with the General Secretariat for Trade of the Ministry of Development and the National Centre for Public Administration and Local Government, has already completed the certification of 5,500 public sector employees. In fact, in 2026, as part of the reform of the National School of Public Administration, a specialized department for students in the field of public procurement is planned to be created.

As presented above, in order to tackle corruption and maladministration, three (3) separate working groups have been set up as part of the relevant actions of the National Strategic Plan to Combat Corruption, with the main task of evaluating, simplifying, standardizing, and digitizing selected administrative procedures in specific thematic areas that are highly susceptible to such phenomena, such as the payment of agricultural subsidies and welfare benefits (see Minimum Guaranteed Income).

iv. Register of Public Procurement Professionals:

A Register of Public Procurement Professionals was established, aiming to strengthen professionalisation, integrity and accountability of officials involved in public procurement procedures.

Registered officials are required, inter alia, to submit asset and interest declarations, to declare any conflicts of interest, and to comply with safeguards ensuring impartiality and independence.

In this context, the National Centre for Public Administration and Local Government (EKDDA), in cooperation with the HSPPA and other competent bodies, implements training and certification programmes, with HSPPA staff participating as trainers, including on corruption prevention, detection and integrity risks in public procurement.

b. Other measures and initiatives on public procurement:

i. Risk Management – Dissemination of Risk Management Framework in Public Procurement.

The National Transparency Authority, in cooperation with OECD and DG Reform, implemented the project 'Enhancing transparency and integrity in the public procurement system through an integrated risk management system, which is funded through the European Union's Technical Support Instrument (TSI). In the context of this project, OECD has developed in cooperation with NTA, HSPPA and the General Secretariat for Commerce of the Ministry of Development, especially with regard to public procurement procedures, a risk management framework along with a risk registry and a code of conduct for public procurement practitioners, as well as a risk-based audit methodological tool in cooperation with NTA and HSPPA.

All four deliverables were presented to the public during the final event of the project, organized in the second quarter of 2025. With the exception of the risk-based audit methodological tool, all other three tools are available on HSPPA's and NTA's websites.²⁴ The risk-based control methodological tool, using appropriate indicators, identifies contracting authorities in which indications of corruption or other violations of the law are detected in the awarded public contracts, with the aim of further investigating them.

ii. TSI "Methodological framework for the supervision, monitoring and assessment of the Greek public procurement system".

In June 2025, the Authority approved, pursuant to Action 63 of the National Public Procurement Strategy 2021-2025, a study based on the second deliverable of the project "Methodological framework for the supervision, monitoring and assessment of the Greek public procurement system", which was funded by the European Union, through the TSI (Technical Support Instrument) Service, and implemented by the OECD, in collaboration with the Directorate-General for Structural Reform Support of the European Commission (DG REFORM).

The purpose of the above study is to compile a number of indicators, which fall into three (3) general categories/pillars of composite performance indicators KPI's-key performance indices (compliance KPI's, efficiency KPI's and strategic KPI's), which cover the three phases of the procurement cycle of tender procedures, namely the phase (stage) before the submission of the bid (planning), the phase (stage) of submission of the bid and the phase of management-execution of the contract.

iii. Conference at EKDDA on enhancing transparency and integrity in the public procurement system.

A conference on Enhancing transparency and integrity in the public procurement system through an integrated risk management system, held at EKDDA, with the aim of presenting and disseminating the results of the technical assistance project, implemented by NTA in collaboration with HSPPA, the General Secretariat for Trade, and the OECD, with funding from the European Commission's Technical Support Instrument (TSI). During the conference, officials from the relevant national bodies and experts from abroad highlighted the project's deliverables, in particular:

- the benefits of implementing a comprehensive framework for identifying and mitigating risks in public procurement,
- the added value of the risk-based audit planning methodology the importance of adopting the model Code of Conduct to reinforce the values of integrity and accountability among public procurement professionals.

All participants (more than 1.000) from the public and private sectors had the opportunity to learn about the tools developed during the project and good practices applied in other EU countries. The discussion focused also on exploiting the potential offered by artificial intelligence in the fields of fraud and corruption control and prevention, as well as the key challenges for its implementation.

iv. Webinar on Risk Management in Local Government: Tools, Challenges

On November 18, 2025, NTA, in collaboration with the Municipality of Athens, held an online seminar on "Risk Management in Local Government: Tools and Challenges" to raise awareness about the importance of integrating risk management into the functioning of municipalities and Local Government.

During the webinar, the basic aspects of the institutional framework for risk management were examined and discussed, as well as practical tools and illustrative examples. The Head of the Corruption Risk Assessment & Special Sectoral Strategies, as well as the Heads of the Corruption Risk Management and Special Sectoral Anti-Corruption Strategies Departments of NTA discussed further the relevant developments in the field. Through targeted prevention actions, the NTA actively supports municipalities in strengthening integrity mechanisms, promoting transparency and accountability.

v. Guidance to contracting authorities and entities regarding criminal liability of legal persons:

Following the enactment of Law 5090/2024 (GG A' 30), which introduced autonomous criminal liability of legal persons for bribery offences, the HSPPA, through its documents under no 5868/202441 and 8822/202542, provided guidance to contracting authorities and contracting entities on their obligation, in the context of public procurement procedures, to verify whether participating legal persons or entities have incurred criminal liability for bribery-related offences, in accordance with national and EU law.

vi. Measures against conflicts of interest: HSPPA, in accordance with the provisions of Law 4412/2016, was informed by four (4) contracting authorities regarding the measures they took in corresponding cases of public procurement, in order to avoid conflicts of interest.

One case of economic operator's prior involvement in the award of a contract, which was identified through an audit, was forwarded to the competent authority.

c. Hellenic Competition Commission: Strengthening Judicial Capacity Against Bid Rigging in Public Procurement

As part of the European project "Fighting bid rigging in public procurement", the Hellenic Competition Commission (HCC) has taken an active role in promoting the rule of law and safeguarding public interest by participating in a multi-country initiative supported by the OECD and the European Commission's DG REFORM. This initiative, which is being implemented across six EU Member States (Austria, Bulgaria, Croatia, Cyprus, Romania, and Greece), aims to prevent distortions in public procurement, enhance inter-institutional cooperation, and ensure the proper use of public resources.

In this context, on 26 September 2025, the HCC co-organised a specialised seminar for judicial officials in Athens, titled "Enhancing judicial control in the fight against bid rigging in public procurement." Hosted at the Ministry of Justice's "Lambros Margaritis" amphitheatre, the event gathered judges, legal experts, and enforcement authorities to exchange knowledge and strengthen judicial awareness regarding cartels in public tenders.

The seminar focused on building judicial capacity to detect, evaluate, and sanction collusive practices. It included in-depth presentations on evidentiary challenges in cartel investigations, with particular attention to indirect evidence in cases involving secret agreements. The event was opened by the Deputy Minister of Justice, Mr. Ioannis Bougas, who emphasized the urgency and importance of tackling bid rigging to protect public trust and economic integrity.

Key contributions included an insightful analysis by a Judge of the General Court of the EU, who discussed the complexities of proof in cartel cases and the importance of using circumstantial evidence. Additionally, a Legal Advisor from the Court of Justice of the EU presented examples from EU case law, showcasing how European courts approach the concept of single and continuous infringement, underlining the value of clear and substantiated legal interpretation by competition authorities.

⁴¹<https://diavgeia.gov.gr/doc/%CE%A1%CE%9D%CE%911%CE%9F%CE%9E%CE%A4%CE%92-%CE%97%CE%A90?inline=true>

⁴² <https://diavgeia.gov.gr/doc/97%CE%922%CE%9F%CE%9E%CE%A4%CE%92-%CE%9D%CE%939?inline=true>

HCC officials presented the Commission's enforcement powers and tools, shared recent decisions involving bid rigging, and underlined the significance of cooperation with judicial authorities. The HCC also highlighted its role in ensuring transparency, enforcing competition law, and supporting judicial decision-making through training and awareness initiatives.

This activity forms part of a wider HCC effort to support a culture of compliance and integrity, in line with the broader objectives of the project. It reinforces the Commission's institutional commitment to promoting competition, preventing collusion, and contributing to a robust and effective rule of law framework in Greece⁴³.

d. Uniform Local Government Code

In 2025, the draft bill Local Government Code took its final form, including provisions on all issues relating to the organization and operation of municipalities and regions.

More specifically, the Local Government Code includes the following Books with their respective contents:

- a. Book A, which deals with the establishment and organization of municipalities and regions and the electoral system for electing their elected administrative bodies
- b. Book B, which deals with the system of governance of municipalities and regions, their advisory and consultative bodies, the functioning of their legal entities, and the statutory position of their single-member administrative bodies
- c. Book C, which deals with the ways in which municipalities and regions exercise their powers and the recording of powers that are delegated state powers or powers that constitute the administration of their local affairs (in a special table in the annex to the Code)
- d. Book D, which deals with the financial organization and administration of municipalities, regions, and their legal entities
- e. Book E, which deals with the organization of state supervision of municipalities, regions, and their legal entities, and
- f. Book F, which deals with general provisions applicable horizontally throughout the Code

The drafts of the above Books (except for Book F and the part of Book B that refers to the legal entities of municipalities and regions) have already been submitted to KEDE and ENPE, and have been finalized for submission to public consultation, which is scheduled to take place at the end of January 2026.

In particular, the third book of the Code clarifies and codifies, in accordance with the OECD's COFOG standard and the relevant provisions of Law 5013/2023 on multi-level governance, the powers exercised by municipalities and regions. With the passing of the relevant law in the first half of 2026, the operating framework of first and second-level local authorities is expected to improve substantially, enhancing transparency and good governance and significantly reducing both bureaucracy (since both citizens and services will know who does what) and the chances of maladministration and corruption.

e. Extension of the scope of Law 5026/2023 with regard to persons subject to the obligation to submit declarations of assets - Article 49 of Law 5193/2025:

Article 49 of Law 5193/2025 "Strengthening the Capital Market and Other Provisions" (GG A 56/11.04.2025) amends Article 16 of Law 5026/2023 (GG A 45/28.02.2023) and provides for the obligation to submit a declaration of assets by the presidents, managing directors, executive members of boards of directors, and general managers of Real Estate Investment Companies, with the aim of increasing transparency in the sector of these companies.

f. Implementation of Regulation (EU) 2023/1114 of the European Parliament and of the Council of May 31, 2023, on markets in crypto assets - Law 5193/2025:

⁴³ More information about the project is available at:

<https://www.oecd.org/en/about/projects/fighting-bid-rigging-in-public-procurement-in-austria-bulgaria-croatia-cyprus-greece-and-romania.html>

1. The provisions of Chapter B of Part C of the above Law set out measures to implement Regulation (EU) 2023/1114 of the European Parliament and of the Council of May 31, 2023, on markets in crypto assets. In particular, the said Law regulates the legal form of companies which have their registered office in Greece and provide crypto asset services, issue electronic money tokens or asset-backed tokens, and conduct public offerings of crypto assets other than asset-backed tokens or electronic money tokens (Article 97), and provides for criminal penalties for anyone who intentionally provides crypto asset services on a professional basis without the license required by Regulation (EU) 2023/1114 (Article 107).

2. Furthermore, the provisions of this law broaden the scope of Article 4 of Law 4990/2022 (A' 210/11.11. 2022) on the protection of persons who report or disclose infringements of Union law, so that its protective scope also covers persons who report or disclose infringements in the field of cryptocurrency markets (Article 114) .

g. Transportation of Directive (EU) 2024/1226 of the European Parliament and of the Council of 24 April 2024 on the definition of criminal offenses and penalties for infringing Union restrictive measures - Law 5232/2025:

Law 5232/2025 (GG A 163/22.09.2025) transposed into Greek legal order the Directive (EU) 2024/1226 of the European Parliament and of the Council of 24 April 2024 on the definition of criminal offenses and penalties for infringing Union restrictive measures.

Article 4 of the above law defines as criminal offenses the violation of a prohibition or obligation that constitutes a restrictive measure of the European Union or that is specified in a national provision for the implementation of a restrictive measure of the European Union, which, according to Article 5, are punishable as misdemeanors or felonies in the cases specified therein, while paragraphs 2 and 3 of the same article provide for aggravating circumstances. In addition, paragraph 5 of the same article provides for the imposition of a reduced penalty, in accordance with the provisions of Article 83 of the Penal Code, if the perpetrator demonstrably provides the competent authorities with information that they would not otherwise be able to obtain, assisting them in identifying and bringing other perpetrators to justice or in finding evidence. Paragraph 6 of the above article provides for the possibility of the Court imposing the additional penalties of Article 60 of the Penal Code concerning deprivation of positions and offices, Article 65 of the Penal Code, concerning the prohibition of practicing a profession, and Article 67 of the Penal Code, concerning the publication of a conviction, regardless of whether the conditions laid down in those articles are met.

Furthermore, **para 2 of Article 4** ensures that no obligation is imposed on lawyers and notaries to report information which they receive or obtain from their client or concerning him in the course of ascertaining his legal position or in the performance of their duties of defense or representation in or in connection with court proceedings, including advice on initiating or avoiding such proceedings, provided that they are covered by confidentiality, in accordance with Articles 371 of the Criminal Code on breach of professional secrecy, Article 212 of the Code of Criminal Procedure on the professional secrecy of witnesses, and Article 38 of the Lawyers' Code (Law 4194/2013, GG A' 208) on the secrecy and confidentiality of lawyers.

Paragraph 3 of the same article expressly stipulates that violation of the prohibitions and obligations set out in paragraph 1 shall in no way be considered to constitute criminal liability in the case of the provision of humanitarian assistance to persons in need or the performance of activities for the protection of human rights. 1 shall in no way be considered to give rise to criminal liability in the case of the provision of humanitarian assistance to persons in need or the performance of activities in support of basic human needs provided in accordance with the principles of impartiality, humanity, neutrality, and independence, in accordance with international humanitarian law.

The provision of **Article 9** of the above Law added paragraph e) to Article 4 of Law 4990/2022, so that its protective provisions for persons reporting violations of EU law also include those reporting violations of EU restrictive measures, while with the provision of Article 15 of the same Law the criminal offense in question was included in the basic offenses of money laundering provided for in Article 4 of Law 4557/2018.

Finally, **Article 18** of the law added para 3 to Article 100 of the Code of Criminal Procedure, concerning the right of access to case files and disclosure of investigation documents, specifically granting the

competent judicial and prosecuting authorities the power, during the investigation, preliminary investigation, or preliminary examination of offenses that infringe on non-personal legal interests, to decide, giving priority to the defendant's right to a fair trial, to exclude him from part of the case file, except for that on which his arrest and provisional detention are based, if access to it could put the life or fundamental rights of another person in immediate and serious danger, or if such a refusal is absolutely necessary to protect an important public interest, and especially, in cases where access could jeopardize the conduct of an investigation or seriously harm national security. In the event of a refusal, the accused or their counsel may lodge an objection with the competent judicial council, which shall take a final decision.

h. The operation of the Court of Audit

i. Thematic audits and the respective reports

In 2025, the following thematic audits were concluded and the respective reports were published:⁴⁴

- Monitoring the concession arrangements for the use of beach and seashore: Is it effective? (Audit Report 1/2025);
- Forest Fires: Is the effectiveness of the restoration programs monitored? (Audit Report 2/2025);
- Bequests to Higher Educational Institutions, the Academy of Athens and the Greek State Scholarship Foundation: Is their management and utilization sufficiently monitored? (Audit Report 3/2025);
- Public contracts of works: Are they planned as long-term investments or short-term projects? (Audit Report 4/2025).

Additionally, in February 2025 the audit report on the “Supervision of the progress on the establishment of internal control systems and the organization and operation of internal control units in public sector entities” was published.⁴⁵

ii. The Annual Audit Programme for 2026

According to the Annual Audit Programme for 2026, the following audits have been planned:

- Hellenic Agricultural Insurance Organization (ELGA): Is the operation of the agricultural insurance system efficient? Is it adequately adopted to the climate change challenges?
- Postgraduate programmes provided by Higher Educational Institutions: Periodical assessment of the criteria for their selection and evaluation of the legality of their function and management.
- Overdue debts of hospitals: Are there delays in their payment and which are their causes?
- Short-term measures against unfair profiteering, from essential goods, in period of high inflation: Are their targets concrete and accomplished?
- Cleaning of premises: Are the competent authorities monitoring the efficient implementation of those preventive measures during fire seasons?
- Granting entry and residence work permits: Are the competent authorities complying with the applicable normative framework in processing the respective applications? Is the goal of attracting third-country workers achieved?
- School buildings: Are the measures adopted for earthquake resistant control adequate for their protection?

iii. The mandatory pre-contractual audit of legality of public contracts

The Court of Audit, within the context of the mandatory pre-contractual audit of legality, periodically publishes on its official website the accrued number of public works, supply and service contracts, which have been audited by its competent Audit Director or its Judicial Sections as well as the outcome of the audits conducted. The negative Acts (i.e. Acts not authorizing the signature of contracts) may be contested by means of an appeal for revocation before the Seventh Chamber of the Court, the respective judgments of which may further be contested before the Plenum of the Court (appeal for review).

iv. The “Rules of Procedure applicable to the Administrative and Audit Units of the Hellenic Court of Audit”

By virtue of (normative) Decision FG8/36878/30.6.2025 of the Court’s Plenum, the “Rules of Procedure applicable to the Administrative and Audit Units of the Hellenic Court of Audit” were modified (GG B’ 4257/05.08.2025). Under said Rules of Procedure are regulated matters concerning the internal

⁴⁴ <https://www.elsyn.gr/el/node/1781>

⁴⁵ <https://www.elsyn.gr/el/node/1743>

organization and function of the Court's Services, to which its' judicial employees offer their services. In particular, the following matters are regulated: (i) the organisational chart of the administrative and audit units; (ii) the allocation of the judicial employees' statutory posts in these services and (iii) the determination of the administrative and audit remits of the aforementioned services, as well as of the respective procedures. Those revised Rules provide for, inter alia, a centralized procedure for the planning and execution of ex-post financial audits and for the supervision of the latter by judges.

v. The "Procedure for the Audit, by the Court of Audit, upon the Special Account of Guarantees for Agricultural Products"

By virtue of (normative) Decision FG8/35797/25.6.2025 (GG B' 4143/30.7.2025) of the Court's Plenum, the "Procedure for the Audit, by the Court of Audit, upon the Special Account of Guarantees for Agricultural Products" was established, on the basis of Arts. 9 para 1 (d) and 127 of the Court's Organic Law (Law 4820/2021), as currently in force. According to the provisions of Article 69 of Law 5264/2025 (Government's Gazette A' 239/19.12.2025), regarding the management of the Special Account of Guarantees for Agricultural Products and the reform of the procedure for the repayment of unlawful and undue payments, the Court of Audit has the jurisdiction over these disputes.

6. Measures for the prevention of corruption in relation to the issuing of official permits (e.g. related to environment, energy, service provision and various types of construction)

a. Public Procurement – The Law 5218/2025 (GG A' 125):

Please see our answer above concerning Public Procurement, the Law 5218/2025 (GG A 125) on the reform of the framework for the professional training of employees handling public contracts, the framework for the preparation and award of public contracts, and legal protection in the field of public contracts, as well as other measures concerning the above sector.

b. Ministry of Infrastructure and Transport

i. Existing Institutional and Organisational Safeguards:

The Ministry of Infrastructure and Transport has implemented a structured integrity framework aimed at preventing and addressing corruption risks, particularly in high-exposure sectors such as public works, transport services and the management of EU-funded projects.

An Integrity Advisor has been appointed to strengthen internal accountability and compliance.

Furthermore, a Code of Ethics and Integrity Policy (ADA: 9ΓΛΙ465XΘΞ-BAΣ) has been adopted, establishing binding principles on professional conduct, conflicts of interest and transparency, thereby safeguarding institutional credibility and ethical standards within the administration.

For projects financed under the Recovery and Resilience Facility (RRF), a dedicated Procedures Manual (ADA: 9ΟΘΧ465XΘΞ-ΣΞ1) has been adopted, incorporating:

- an Anti-Fraud, Anti-Corruption and Conflict of Interest Strategy,
- a standardised fraud risk assessment procedure,
- and a structured complaints handling mechanism.

In parallel, the digitalisation of registration and certification processes through the Integrated Information System of the Electronic Register of Public and Private Works Stakeholders (MHTE) has significantly enhanced traceability, uniform supervision and procedural transparency.

ii. Forthcoming Institutional and Digital Reforms:

Building upon the existing safeguards, additional reforms are being implemented in key risk areas.

(a) Imported Used Vehicles Registry (IUVR)

An amendment to Article 51 of Law 4784/2021 is being promoted to make prior registration in the Imported Used Vehicles Registry mandatory before first registration of such vehicles. This measure ensures full traceability of supporting documentation and establishes a clear and transparent administrative precondition, limiting opportunities for irregular practices.

(b) Oversight of Driver Examinations

A comprehensive supervisory framework is being developed for theoretical and practical driving examinations. The reform aims to:

- Ensure proper conduct of examinations by competent authorities and examiners.

- Introduce systematic supervision of all stakeholders involved, including training centres, driving schools, instructors and examiners.

Risk analysis tools, evaluation of audiovisual material (where applicable) and coordinated institutional interventions are envisaged to address long-standing integrity concerns.

(c) Central Digital Driver Training Registry

A unified digital platform is being established to interconnect training centres, driving schools, regional transport authorities, the Ministry and the National Transparency Authority. The system will enable:

- electronic recording and certification of training sessions,
- automated examiner allocation,
- digital recording of examination results,
- integration of audiovisual evidence where applicable.

This full digitalisation enhances traceability, objectivity and transparency while limiting discretionary interventions.

(d) Digital Monitoring and Compensation Systems in Public Transport

A nationwide integrated system combining:

- telematics monitoring of transport services, and
- electronic ticketing and revenue monitoring,

is being developed. The interoperability of operational and financial data allows objective verification of service delivery and transparent calculation of public compensation, thereby strengthening financial oversight and preventing irregular practices.

(e) Unified Digital Map of Expropriations (e-apallotriosis)

A comprehensive Geographic Information System (GIS) for expropriations and claims is under implementation, including digitisation of archival material and interoperability with key public systems such as the Hellenic Cadastre and TAXIS. The system enhances transparency, traceability of administrative actions and public access to geospatial information.

(f) Integrated Program Management System for Technical Works (OPS-DTWP)

The Integrated Digital System for the Management of Technical Works and Resources functions as a central hub for monitoring the full lifecycle of public works, providing real-time data on cost, timeline and deliverables. The transition from paper-based procedures to structured digital workflows significantly strengthens accountability and transparency.

c. Overall Assessment

The above measures form a coherent and progressively strengthened anti-corruption framework, characterised by:

- institutional integrity safeguards,
- structured risk assessment mechanisms,
- extensive digitalisation of high-risk procedures,
- interoperability of information systems,
- enhanced traceability and accountability.

These initiatives align with the objectives of the National Anti-Corruption Strategy and reinforce the principles of the rule of law, transparency and sound financial management within the public administration.

C. Repression

1. The legal framework on the criminalisation and sanctions for corruption and related offences, including foreign bribery

a. Reform of the Disciplinary Law for Civil Servants - The new disciplinary Law 5225/2025

A significant reform undertaken in the previous period by the Ministry of Interior is the reform of the disciplinary law for civil servants.

Law 5225/2025 (46) introduces the new disciplinary law, into force as of January 1, 2026, with the aim to speed up the administration of disciplinary justice and enhance transparency. The framework aims also at tightening control and sanctions in the public sector as it redefines the limits of professional conduct, expands disciplinary offenses, and broadens the cases that can lead to permanent dismissal from service. New provisions apply to the entire public sector: to civil servants, local government employees, and legal entities governed by public law.

The key element of the changes in civil servants' disciplinary law is the establishment of a new supreme disciplinary body, the **"Disciplinary Council for Human Resources of the Public Sector"**, which replaces the previous first-instance disciplinary councils, as well as the corresponding second-instance body (Articles 17 and 20 of Law 5225/2025).

The new disciplinary body is competent for exercising disciplinary authority over employees of the public sector and legal entities of public law. It is composed of a total of 60 public officials who are members of the legal personnel of the Legal Council of the State. The new Disciplinary Council for Human Resources of the Public Sector began operating on 1 January 2026 with a 15-member composition, and will operate in full composition from 1 July 2026 onwards.

The meetings of the new disciplinary body, as provided for in the relevant law (Article 20, paragraph 4 of Law 5225/2025), will be held in panels of three or five members, depending on the disciplinary case being heard. This will ensure integrity, impartiality, independence, and the administration of true disciplinary justice in every disciplinary proceeding, while at the same time ensuring the speed of disciplinary proceedings due to the functional specialization of the members of the Public Sector Human Resources Disciplinary Council in this area and their exemption from any other duties.

The new law aims to accelerate and enhance effectiveness and accountability, providing, inter alia:

- Simplification** of procedures: Elimination of non-essential bureaucratic stages.
- Acceleration**: Establishment of binding deadlines for each stage of the disciplinary process.
- Accountability** measures for unjustified delays.
- Restructuring** of disciplinary offences and penalties to rationally increase the stringency of the framework.
- Use of **telecommunication applications** for remote sessions.

b. Establishment of the Police Directorate for Ethics and Internal Audit (Law 5187/2025)

The purpose of this new Directorate is to strengthen internal oversight and institutional integrity.

Responsibilities:

- Central planning of internal audit policies.
- Administrative investigations and accountability procedures.
- Supervision and evaluation of field investigations.
- Promotion of professionalism, transparency, and integrity.

The Directorate reports to the Chief of the Hellenic Police (EL.AS.) and is institutionally supervised by the National Transparency Authority and the Ombudsman (as the National Mechanism for the Investigation of Arbitrary Acts).

c. The Certified Training "e-peitharxika" – Transparency in disciplinary law and procedures:

We remind that the "e-Peitharxika" application is an innovative digital tool, which enhances transparency and accountability in the public sector.

In 2025, NTA initiated a certified training programme on "Management of the National Transparency

⁴⁶ <https://www.ypes.gr/wp-content/uploads/2025/09/FEK-152-20250902-%CE%9D5225-2025.pdf>

Authority's 'e-Peitharxika' electronic application". The program is conducted through the Training Institute (INEP) of the National Centre for Public Administration and Local Government (EKDDA). The 35-hour programme aims at presenting to the participants (employees of the Directorates and Departments of Administration/Personnel/Human Resources, Secretaries of Disciplinary Councils and their deputies, as well as any employee handling disciplinary cases) the "e-Peitharxika" digital application, as well as at training and educating participants in its use and familiarising them with practical issues along with strengthening their knowledge in disciplinary law.

2. Official data on the number of investigations, prosecutions, final judgments, and the application of sanctions for corruption offences (differentiated by offence if possible). Please indicate whether the cases: involve legal persons; are related to the implementation of EU or national funds; involve high level corruption. Please indicate which data is publicly available and how policy-making is informed by the data.

a. Statistics on corruption, including high level corruption.

Please see in the relevant Annex Statistics on corruption, including high level corruption, provided by:

- i. Judicial Statistics Bureau (JustStat Bureau) of Ministry of Justice**
- ii. Economic Crime Public Prosecutor's Office**

b. Statistics of the Court of Audit:

Within 2025, 11 applications were lodged by the Court's Deputy Advocate General before the competent Chambers, for the imputation either of individuals, the possessions of whom were not justified following an asset declaration audit, or of public officials/employees for damages caused to the State, local authorities or to public legal entities. The hearing of the latter cases is pending.

Within 2025 the competent judicial Chambers of the Court of Audit delivered:

(i) 11 judgments, upholding (partially or in their entirety) the respective applications, lodged by the Court's Deputy Advocate General for the imputation either of individuals, the possessions of whom were not justified following an asset declaration audit or for damages caused by officials/employees to the State, local authorities or to public legal entities;

(ii) 157 judgements on imputation disputes arising from financial corrections and revocations against persons liable to public accountability, including proceedings pertaining to the repayment of financial aid received from EU Funds. Those judgments, delivered by the Court's Chambers, are final, having the legal consequences provided for in their enacting terms and may be appealed on a point of law ("ανάρρηση"), before the Court's Plenum, according to the Court's Uniform Procedural Code (Law 4700/2020, GG A' 127).

Finally, by means of decision 1476/2025 of the Minor Panel of the Court's Plenum, the following issue of major importance was referred to and is currently pending before the Major Panel: whether the implementation of the 20-year time-limit, which applied before the entry into force of Law 4571/2018 (A' 186), for the audit of asset declarations and the respective statute of limitations on the State's right to impute individuals liable to submit asset declaration, in case a violation of the pertinent legislation was ascertained, is contrary to supra-legislative provisions.

c. Statistics and Operation of the Central Audit Committee (CAC) in 2025:

i. The operation:

The Central Audit Committee (CAC) in 2025, met 6 times and made a total of 127 decisions (68 in 2024), of which 43 (28 in 2024) related to audit issues (regular and complaints) and 84 (40 in 2024) procedural issues. Regarding the preparatory stages of electronic submission of assets, they were successfully completed in 96% (95% in 2024). There remain some organizational issues that require further attention so that the complete system for both the submission and control pillars can function smoothly and quickly as required by law. For example, further resources are required for the coordination work of the special service to assist the supervisory work of the commission (Article 45, par. 4b), as well as for the co-signing of a) the legal agreement between the commission as the Central Audit Committee and the GGPS, (Article 24, par. 3) and b) the memorandum of understanding between the audit bodies among themselves, on the one hand, and between them and the GGPS, on the other hand. Finally, the judicial members of the Commission should be full-time and exclusive so that the Commission can meet more

frequently, and the decision-making process can be smoother and more accelerated, given that the issues it has to deal with are constantly increasing.

ii. Asset declarations audits:

The common methodology of the network of control bodies was further streamlined in terms of common procedures, as well as legislative provisions and international standards. Control productivity also increased in 2025 according to relevant indicators. The annual average of verifications (workload) per auditor, which increased to 80% in 2025 compared to 78% in 2024. Verification numbers also showed an annual increase of 20%. In 2025, there were 24,156 human verification checks on declarations of the last five years, compared to 19,341 in 2024. The total number of audits by all control bodies exceeds for the third year in a row by 120% the base rate set by the law of 7% for the third year and reaches 8%. In addition, the indicator of high-risk verifications, (5% as in 2024) indicates a consistency of high percentage verifications for this category of checks at 95% as in 2024. Finally, in 2025, 1,615 misconduct cases concerning the last five years were sent to the prosecutor, of which 907 (9581 in 2024) cases concern non-submission of a declaration and 708 cases (109 in the same period in 2024) relate to other findings of the control of declarations.

In 2025, revenues amounting to € 1,454,750 were collected from the payment of 16,130 fees for the late submission of Asset Declarations (DPK).

iii. Political Parties audits:

In 2025, the audit of the finances of political parties, coalitions of parties for the financial year 2023 was completed. 18 political parties / coalitions of parties were audited, and violations of the relevant legislation were found in 8 of them. The Commission (CIDA) submitted its proposal with its proposed sanctions for 6 of these parties to President of the Parliament, as provided for by domestic legislation, and which were adopted in full. For the remaining 2 parties / coalitions of parties, due to the minor gravity of the violations they committed (mainly formal violations of the law) (CIDA) decided not to propose sanctions and sent them letters of compliance. (Related post on the Commission's website):

<https://epitropielegxou.parliament.gr/%CE%9F%CE%B9%CE%BA%CE%BF%CE%BD%CE%BF%CE%BC%CE%B9%CE%BA%CE%AC%CE%A3%CF%84%CE%BF%CE%B9%CF%87%CE%B5%CE%AF%CE%B1/%CE%9A%CE%BF%CE%BC%CE%BC%CE%AC%CF%84%CF%89%CE%BD/%CE%A0%CF%81%CE%BF%CF%8B%CF%80%CE%BF%CE%BB%CE%BF%CE%B3%CE%B9%CF%83%CE%BC%CE%BF%CE%AF%CE%91%CF%80%CE%BF%CE%BB%CE%BF%CE%B3%CE%B9%CF%83%CE%BC%CE%BF%CE%AF%CE%99%CF%83%CE%BF%CE%BB%CE%BF%CE%B3%CE%B9%CF%83%CE%BC%CE%BF%CE%AF>

d. Statistics of NTA's latest annual report (issued in 08.2025)

According to NTA's latest annual report (issued in 08.2025), in 2024 NTA reported the following numbers:

i. Overall Performance

- 5.305 Incoming Complaints
- 2.796 Audit & Investigation Orders
- 2.527 Audit & Investigation Reports
- 1.636 Investigation Orders
- 763 Audit Orders (not including audit orders for the protection of public health) – For further analyses of the audit orders, see also the table below.

Number of audit orders per Directorate (Central and Regional Directorates)

Central Service	2024	(%)
Health and Welfare	230	44.65
Education, Research - Technology, Culture and Sports	76	14.76
Social Security, Social Solidarity and Labour Relations	61	11.84
Regional and Local Authorities, Decentralized Administration and Migration	59	11.46

Economy and Development	40	7.77
Public Works and Transport	20	3.88
Environment, Energy and Communications	17	3.30
Built Environment and Spatial Planning	6	1.17
Disciplinary Procedure Control	6	1.17
Sum (1)	515	100
Regional Directorates		
Thessaloniki	86	34,68
Serres	64	25,81
Larissa	41	16,53
Rethymno	26	10,48
Patras	22	8,87
Tripoli	9	3,63
Sum (2)	248	100
Sum (1+2)	763	

- 117 Systemic audit orders on health service structures & public services
- 18 Mobbing audit orders concluded
- 332 Asset declaration audit orders
- 1.160 Concluded Investigations
- 727 Audit reports (not including COVID-19 & anti-smoking legislation audit reports)
- 119 Audit reports with indications of disciplinary and/or criminal liability

ii. Systemic Audits

NTA conducted a series of systemic audits according to the Annual Audit Plan on:

- 9 audits on the legality of school trip procedures
- 7 audits in municipal cinemas
- 5 audits on municipal record transfer
- 2 audits on pushbacks
- 29 audits on building permits and urban planning
- 15 audits on mobbing

iii. Asset Declaration Audits

- 13.820 liable persons from entities falling under the competence of NTA were audited as to their compliance with the obligation to submit a declaration of assets and financial interests.
- Increases in assets amounting to a total of 381.151,5 € were found in 7 cases.

iv. Disciplinary Procedures

- 2.273 disciplinary cases examined
- 1 appeal before the Council of State
- 238 natural persons subject to disciplinary liability
- 11 judicial authorities' orders, concerning both 2023 and previous years, executed
- 438 cases related to the disciplinary control of public employees examined
- 6.391 documents received, examined and evaluated (summons to a plea, referrals to disciplinary boards, criminal prosecutions, criminal decisions, indictments, suspension acts, removal acts)
- 30 objections submitted to the Disciplinary Boards of First & Second Instance

v. Results from the exercise of disciplinary competences

- 53 disciplinary decisions (33 concern written reprimand and 20 were acquittals)

- In 27 cases (90%) objections and appeals were upheld or a heavier penalty was imposed
- Following objections/ appeals, the penalty of final dismissal was imposed in 10 cases

Disciplinary accountability by capacity

Disciplinary accountability by capacity	2024
Employee	92
Head of Directorate	53
Elected Person	32
Head of Department	26
Mayor	13
Pharmacist (private sector)	4
Doctor (private sector)	3
Head of Directorate General	2
Engineer (private sector)	2
Other (Member of Teaching and Research Staff, Health personnel etc.)	11
Sum	238

90 final Dismissals, mainly for the offence of unjustified abstention from the performance of official duties. See also the table below for the analysis of offences where the final dismissal has been imposed.

Final Dismissals for disciplinary offenses or criminal offenses

Disciplinary offence	Final Dismissals
Unjustified Abstention from the performance of official duties	60
Bribery of employees and doctors	9
Breach of Duty, False Certification	5
Crimes against Sexual Freedom	4
Embezzlement and Deficit of the Accountant Administrator	3
Forgery	2
Illegal prescription (felony)	2
Criminal Organization, Breach of Trust in Public Service	1
Distinguished trafficking of narcotic substances by a physician	1
Violation of drug laws	1
Criminal antiquities trafficking by museum guard	1
Refusal to attend a medical examination, inappropriate behavior	1
Sum	90

vi. Implementation of Proposals - Recommendations in Audit Reports

- 74,09% of proposals - recommendations were implemented by the audited entities

e. Statistics on disciplinary cases of the electronic database 'e-Peitharxika'⁴⁷:

The progress of disciplinary cases has been monitored since early 2024 in the electronic database 'e-Peitharxika'⁴⁸ of the National Transparency Authority. This platform systematically monitors the progress of preliminary examination procedures, sworn administrative examination procedures (EDE), disciplinary proceedings, criminal cases related to disciplinary proceedings of single-member or collective disciplinary bodies, and disciplinary cases after the issuance of disciplinary decisions, in the event of legal action.

Based on official data recorded on the 'e-Peitharxika' electronic platform, as of mid-December 2025, 4,307 disciplinary cases were pending. Of these, 82.44% (3,551/4,307) were concentrated in 18 of the 72 primary disciplinary councils to which they had been assigned for adjudication.

This highlights the need to reform disciplinary law and the process of administering justice, which the political leadership of the Ministry of the Interior has recently undertaken. With the new disciplinary body that has been set up, the "Public Sector Human Resources Disciplinary Council" (Article 20 of Law 5225/2025), the adjudication of disciplinary cases will be significantly accelerated and there will no longer be a risk of them becoming time-barred.

f. Statistics of Internal Affairs Service of the Security Forces (I.A.S.S.F.):

The Internal Affairs Service of the Security Forces (I.A.S.S.F.) which was established by the Law 4613/2019 is a single independent special service, reporting directly to the Minister of Citizen Protection. Internal Affairs Service of the Security Forces has as its mission the investigation, investigation and prosecution of specific crimes provided for by par. 2 of art. 21 of Law 4613/2019 and are committed or participated in by police officers, port officers and employees of the fire brigade, employees and functionaries of the wider public sector, as well as employees or officials of the European Union or International Organizations operating in the Greek territory.

Investigation and preliminary examination conducted by the Service are supervised directly by senior prosecutors (Prosecutor to the Court of Appeal of Athens and Thessaloniki). This Supervision is exercised either by themselves, or through their subordinate prosecutors or deputy prosecutors of appeals and consists of the right to be informed of all information or complaints that come to our Service, to be aware of all the cases they handle and to monitor their progress, to give instructions, to direct and to be present during the execution of investigative acts.

Every year, the Service's Annual Report with the previous year's events, is published on the website of Ministry Of Citizen Protection (<https://www.minocp.gov.gr/ypiresia-esoterikon-ypotheseewn-somaton-asfaleias/etisies-ektheseis-apologismou/>).

In addition, with regard to dealing with corruption in general, we inform you that, until the writing of this document, there have been no changes both in terms of the legal framework that governs the operation and action of our Service, as well as its application in practice.

In the year 2025, 1492 complaints about corruption offenses were submitted to our Service, 610 preliminary examinations were carried out to verify or confirm the commission of crimes related to corruption, 43 criminal offenses under our jurisdiction were investigated that were committed within the limits of the automatic procedure (in the act) and carried out in total 139 arrests.

Below are detailed specific statistics by area of interest, regarding the action of the Internal Affairs Service of the Security Forces in the year 2025:

Out of the total of forty three (43) files filed for open-ended offenses (in the act) (51 in 2024 and 36 in 2023), apart from the offense of dereliction of duty which is present in the majority of them, among other things, fourteen (14) related to bribery of an employee, thirteen (13) of drug law violations, five (5) cases of guns law violation, three (3) cases of false statement, two (2) cases of fraud, two (2) theft cases, one (1) extortion case, one (1) case of illegal use of force, one (1) case of customs law violation

⁴⁷

https://epeitharxika.aead.gr/?_gl=1*1itwmzp*_ga*MjAwMzc1NTE3MS4xNzY3NzE1Mjg3*_ga_QD1JXRGNFH*cze3Njc3MTUyODYkbzEkZzAkdDE3Njc3MTUyODYkajYwJGwwJGgw

⁴⁸

https://epeitharxika.aead.gr/?_gl=1*1itwmzp*_ga*MjAwMzc1NTE3MS4xNzY3NzE1Mjg3*_ga_QD1JXRGNFH*cze3Njc3MTUyODYkbzEkZzAkdDE3Njc3MTUyODYkajYwJGwwJGgw

and one (1) case of domestic violence. Of the one hundred thirty-nine (139) arrested, twenty-three (23) were police officers, five (5) were port officials, forty-three (43) were civil servants in general, two (2) were firefighters and sixty-six (66) were private citizens. In ten (10), out of a total of forty-three (43) cases filed for spontaneous offenses (in the act), the perpetrators had set up a criminal organization with a specific hard operational structure and hierarchy.

Cross-pillar elements: cross-border rule of law issues related to the Single Market

If you are aware of any significant challenges concerning the Single Market faced by businesses or citizens from your Member State in a cross-border context relating to any of the four pillars of the report, including for example issues with market access and the conditions for economic activities, please highlight them in your input.

a. Digital RRF projects:

1. An Integrated Audit Management System and AI tool (49) to support the entire cycle of audits is on-going. On 21/11/2025 the relevant contract was signed while on 27/11/2025 the competent committees for the monitoring and delivery of project's deliverables have been issued. On 5/12/2025 the drafts of project's deliverables for the implementation study of the 1st phase were submitted to NTA while on 29/12/2025 the 1st version of the project's deliverables for the implementation study of the 1st phase was delivered. The second version is expected by the end of January 2026. The project is proceeding according to schedule.

2. The upgrade of the e-Pothen platform and data base for asset declaration (50) is delayed due an appeal submitted by a candidate to HSPPA and the Court of Appeals. The case was examined on 21.10.2025 and the announcement of the court decision is pending. Given the above the project is no longer eligible under RRF. NTA is exploring alternative path to fund the project.

3. NTA developed a digital forensics Lab (51) for the examination of digital evidence using modern e-tools and technologies (digital forensics software), thus improving scientific efficiency and reliability in forensics investigations. During 2025, all the necessary equipment has been delivered and the lab is expected to be fully operational in Q1 2026.

4. National Communication Campaign: Under RRF funding, the NTA is implementing the "Anti-corruption awareness raising activities" project to enhance its operational capability to design and carry out targeted communication, information and publicity activities, and it is expected to be completed at the Q1 2026.

⁴⁹ **IMS – AUDITS/INVESTIGATIONS:** Development of an Integrated Audit and Inspection Information Management System and an artificial intelligence tool to further enhance the audit work of the National Transparency Authority. The project is expected to improve the effectiveness and efficiency of the audit work which is the first of the Authority's five Strategic Objectives for the period 2023-2027, through the simplification and digitization of procedures, the standardization and production of the required documents through the ERP, the integration and adoption of modern methodological tools (e.g. the RBAP methodology) and the collection and use of information with appropriate processing to visualize useful results (indicators, statistical results, distributions, etc.) to help the monitoring and decision making as well as the implementation of best practices.

⁵⁰ **UPGRADING OF SERVICES FOR THE ELECTRONIC SUBMISSION, CONTROL AND PROCESSING OF ASSET STATEMENTS - ASSETS AND LIABILITIES (E-POTHEN):** The project focuses on modernizing the E-Pothen system by upgrading its services, technology, security, and interoperability to comply with the new institutional and regulatory framework, enhance transparency, reduce corruption, and support economic stability and social cohesion.

⁵¹ **CREATION OF A DIGITAL FORENSICS LABORATORY, ANALYSIS OF DIGITAL EVIDENCE AND ENHANCEMENT OF THEIR EXAMINATION CAPABILITY THROUGH THE SUPPLY OF SPECIALIZED AND SUPPORTING EQUIPMENT AND FORENSIC SOFTWARE (DIGITAL FORENSICS LAB):** The project establishes a digital forensics laboratory to support reliable investigations through scientific methods and modern tools, enabling faster forensic analysis and strengthening the medium long-term efforts to prevent and combat fraud and corruption through targeted measures.

During 2025, the deliverables included the production of a Communication Plan and the design of communication material and activities, the Media Campaign as well as the Production of four (4) animated videos & role-playing games (primary & secondary school students) and the Organization of eight (8) events and one (1) Integrity Forum.

The campaign is being implemented in two distinct phases (A and B) with the aim to enhance awareness about the Authority and its mandate and competencies in combating corruption.

Phase A (August – September 2025): "National Transparency Authority: Source of Integrity, Bridge of Trust," focused on highlighting NTA's work and mission. The campaign used a combination of national and regional television, radio, and digital channels, achieving high coverage and frequency. On YouTube in particular, views exceeded initial forecasts by 117.6%

Phase B (October–November 2025): "Tackling corruption is everyone's business," highlighted the audit work of the NTA's Inspection and Audit Unit, with the aim of mobilizing society to actively participate in the country's efforts to combat corruption. Emphasis was placed on promotion via YouTube, where more than 3 million views were recorded, while on Meta media, views exceeded 5.5 million. The performance of the Google Display awareness campaign was particularly significant, leading to a 467% increase in clicks compared to initial forecasts.

Overall, both phases of the campaign boosted NTA's visibility and simultaneously promoted its work and its significant impact on improving their daily lives.

The relevant TV spots (with English subtitles) are available at the following links:

Phase A: <https://www.youtube.com/watch?v=VJbmZv9LP04>

Phase B: <https://www.youtube.com/watch?v=n05BMb38bTs>

"Information Security Management System according to ISO 27001" is already completed. The project included manuals, security policies and workflows according to ISO 27001 specifications.

b. As far as it concerns ILIMS:

The Integrated Licensing and Inspection Management System (ILIMS) is a digital platform established under Law 4442/2016 to streamline and standardize the licensing and inspection processes for economic activities in Greece. It enables businesses to submit all licensing actions electronically and allows both operators and authorities to access complete licensing and inspection histories through a digital mailbox.

ILIMS serves businesses of all sizes and legal forms and operates 24/7, facilitating digital communication with public authorities. It also supports public administration by improving monitoring, data collection, and policy planning. By standardizing procedures and recording all actions electronically, ILIMS significantly reduces bureaucracy, enhances transparency, and limits opportunities for corruption.

The system is fully operational since February 2025.

The Licensing Management System, since its first operation in February 2025, has approximately 287.000 users (including users from the public sector and economic operators/entities). In addition, approximately 168.400 finalized actions have been carried out regarding distinct licensing procedures. The Inspections Management System will be implemented in a future contract.

c. Raising awareness:

i. The 3rd Panhellenic Student Competition

As regards, the 3rd Panhellenic Student Competition "Integrity Leaders of Tomorrow" for the school year 2024-2025 entitled "Young people discuss corruption and ways to fight it", which was launched by NTA on 1.11.2024, during 2025 all the procedures and meetings of the Evaluation Committee have been concluded and in January 2026 NTA is expected to organize a ceremony to award the Competition winners.

This year Competition includes written and oral contribution, in which students from high schools all over Greece can participate. These initiatives attract the participation of a wide range of students, taking into account that in the two previous student competitions (school years 2020-2021 and 2022-2023), a total of 2,192 students from all educational levels participated with 1,341 projects from 213 schools from all over the country. Raising the awareness of the younger generation on values such as transparency, integrity, justice, democracy, equality, equity, etc. and making them active participants in the effort to fight corruption is a priority of the National Transparency Authority.

ii. Conferences, webinars and workshops

In 2025, the NTA organized the following conferences/ webinars/ workshops:

a. December 2025:

- On December 23, 2025, the fourth annual online workshop - webinar was organized by the National Transparency Authority (EAD), in collaboration with the Hellenic Diplomatic Academy of the Ministry of Foreign Affairs, on the topic "The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (Foreign Bribery)".
- Two online seminars entitled "Codes: Ethics in Practice - How Ethics Becomes a Practical Tool" aiming at highlighting Codes of Ethics as a practical and essential tool to guide public servants in dealing with ethical and moral situations that arise in the daily exercise of their duties. The seminars were held on December 10 and 11, 2025, with the participation of 234 executives from organizations with which the EAD has developed partnerships through Memoranda of Cooperation. A series of similar actions will follow to support and train public sector executives.
- 5th Integrity FORUM: More than 500 members of the student and academic community, as well as executives from public bodies, participated in the 5th NTA Integrity Forum on the occasion of International Anti-Corruption Day. This year's forum, entitled "Building a future with values: Young People and a Culture of Integrity", focused on the student community of the law and political science departments of the National and Kapodistrian University of Athens and the public administration department of Panteion University, with the aim of informing them about the work of the NTA and raising their awareness and involvement in transparency, accountability, ethics, and civic participation.
- Integrity Advisors' Workshop:
NTA organized an Integrity Advisors' Workshop on December 1st with the aim to provide guidelines for the performance of their duties. The newly appointed integrity advisors of the Ministries of Interior, Education, Religion and Sports, Migration and Asylum, Development, Justice, Culture, Infrastructure and Transport, Social Cohesion and Family attended the workshop.

b. November 2025:

- Public Opinion Survey: From November 20 to November 29 a public opinion survey was conducted for corruption in Greece.
- Workshops/NTA: Source of Integrity, Bridge of Trust
More than 610 executives from the public and private sectors (representatives of political leadership, the academic community, and local organizations) attended the two consecutive workshops organized by the National Transparency Authority on November 27 and 28, 2025, in Patras and Tripoli, respectively. The aim of the events was to inform the local community, local government, and public about the role and mission of the NTA.
- Webinar on Risk Management in Local Government: Tools, Challenges
On November 18, 2025, NTA in collaboration with the Municipality of Athens, held an online seminar on "Risk Management in Local Government: Tools and Challenges".
- Workshops/NTA: Source of Integrity, Bridge of Trust
More than 1.440 executives from the public and private sectors (representatives of political leadership, the academic community, and local organizations) attended the two consecutive workshops organized by the National Transparency Authority on November 19 and 20, 2025, in Thessaloniki and Serres, respectively. The aim of the events was to inform the local community, local government, and public about the role and mission of the NTA.

- 8th Compliance Conference

The Association of Compliance Officers in Greece (ASCO Greece), in collaboration with Nomiki Bibliothiki, organized the 8th Compliance Conference, titled "Shaping a Responsible & Resilient Future - Compliance as Catalyst for Business Growth", on Thursday, November 13, 2025, in person at Megaron - The Athens Concert Hall. The conference was held under the auspices of the National Transparency Authority (NTA), the Athens Chamber of Commerce and Industry (ACCI), the Federation of Enterprises



(SEV), the Hellenic Bank Association (HBA), the International Compliance Association (ICA), the

Hellenic Association of Insurance Companies (HAIC), the Association of Certified Fraud Examiners (ACFE), the Hellenic Investors Association (SED), Diversity Chapter Greece, and KEAN.

- Conference on Internal Audit

The Governor of the NTA participated in the annual conference of Internal Auditors, entitled "Auditing the World: the auditor's perimeter in turbulent times" that took place on November 11th, 2025, in Athens.

c. October 2025:

- Workshops/NTA: Source of Integrity, Bridge of Trust

The National Transparency Authority organized an informative workshop on Thursday, October 30, 2025, in Rethymno. The event is being held as part of the NTA's initiative to highlight its role, mission, and multi-level work throughout the country, with an emphasis on control, public accountability, and good governance. During the conference, the Authority's responsibilities and actions were presented, along with statistical data on the management of complaints and reports by the Regional Service of Rethymno, as well as specific examples of audits and case studies. In addition, collaborations with local bodies and good practices implemented in the region was also highlighted.

- "A safe and creative working environment in the public sector"

A contemporary dimension of work in the public sector was highlighted at the event co-organized by the Ministry of Foreign Affairs and the National Transparency Authority on Monday, October 13, 2025, entitled "A safe and creative working environment in the public sector: Good practices for conflict resolution in Greece and Europe." The event focused on the guiding role of the National Transparency Authority and the innovative initiatives of the Ministry of Foreign Affairs in the field of preventing and addressing workplace violence and harassment.

Greece was the first country in Europe to ratify Convention 190 of the International Labour Organization "on the elimination of violence and harassment in the world of work" with Law 4808/2021.

d. September 2025:

- "National Coordination Body for Control & Accountability: Controls, Data Protection & Transparency" by the National Transparency Authority and the Data Protection Authority – Conclusions"

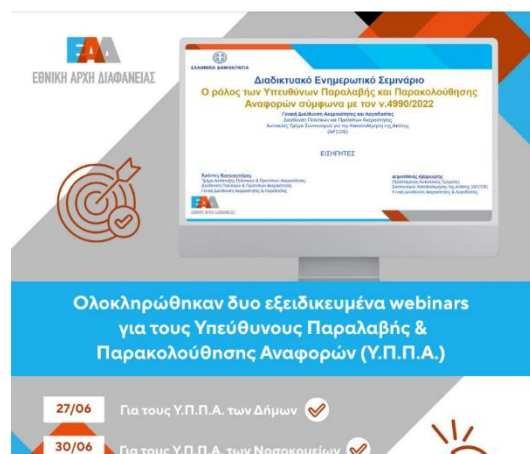
More than 320 executives from public audit bodies attended the workshop co-organized by the National Transparency Authority (NTA) and the Data Protection Authority (APD) in the context of the implementation of the Memorandum of Cooperation they have signed, entitled "National Coordination Body for Control & Accountability: Controls, Data Protection & Transparency". The workshop aimed to inform and raise awareness among the executives of the National Coordination Body for Control and Accountability (ESOEL) on issues of personal data protection and secure processing.

- 89th Thessaloniki International Fair – Two Interactive thematic workshops: "Corruption Affects Us All – Your Opinion Matters!"

More than 350 visitors to the International Fair had the opportunity to participate in the two interactive workshops organized by EAD entitled "Corruption Affects Us All – Your Opinion Counts!" The events took place at the NTA stand on September 6 and 7, 2025, with the participation of representatives of organizations, professionals from the public and private sectors, and citizens. Participants took part in a live vote, answering short questions about the phenomenon of corruption and how to combat it. watched the results of the vote in real time and asked the Authority's executives their own questions about the NTA's initiatives and the actions being taken to enhance transparency.

e. June 2025:

- Two webinars were organized by NTA on the role of officers who receive and follow-up on whistleblower reports in public sector (law 4990/2022 GG A' 210 – Whistleblowers Protection Act), on June 27 and 30, 2025. The first one concerned Municipalities (Local Government) while the second one addressed the challenges met on the Health Sector (Hospitals).
- Workshop: "Internal Audit in Public Administration: Institutionalization – Implementation – Prospects." On Thursday, June 26, 2025, NTA organized a workshop entitled: "Internal Audit in Public Administration: Institutionalization – Implementation – Prospects." The workshop was attended by a total of more than 570 participants (in person and online). The objective of the workshop was to present the report prepared by the NTA entitled "Report on the implementation of Part A of Law 4795/2021 on the Internal Audit System in Public Sector Bodies". The Heads of Internal Audit Units namely from the Ministry of the Interior, the Region of Crete, the University of Patras, the Municipality of Thessaloniki, and the Independent Authority for Public Revenue, presented their projects as well as the progress and difficulties they encountered during their operation.
- 5th Annual Conference HARIMA (Hellenic Association of Risk Managers): "In a World of Risk – Join the Risk Management Revolution". The NTA participated in the 5th Annual Conference of the Hellenic Association of Risk Managers (HARIMA) held on Tuesday, June 17, 2025, entitled: "In a World of Risk, Join the Risk Management Revolution," brought together high-level executives from the public and private sectors, policymakers, and international experts, covering a wide range of topics such as risk management, artificial intelligence, business continuity, and ESG standards.



f. May 2025:

- Countering Corruption in international, European and national framework: Modern challenges for the Rule of Law. On 9.5.2025, a conference was organized by NTA in cooperation with the Law School of the Aristotle University of Thessaloniki.
- "Enhancing transparency and integrity in the public procurement system through an integrated risk management system" (for more info see the section on risk management)

g. March 2025:

On 12.03.2025, 50 students from the 2nd High School of Athens visited NTA's premises to discuss on the concepts of corruption, integrity and accountability and learn about the mandate and competences of the Authority.

All the audiovisual material of the events has been posted on the Authority's web site and on its YouTube channel and is freely accessible to all interested parties, creating a friendly user online library, which is constantly being enriched with new information and awareness-raising activities.

c. Hellenic Competition Commission Strengthens Rule of Law through Judicial Training on Digital Competition Law – Participation in the CompEUte Project:

The Hellenic Competition Commission (HCC) is actively contributing to the promotion of the rule of law and judicial capacity building through its participation in the CompEUte project, a European Union-funded initiative aimed at enhancing the legal knowledge and skills of administrative and civil judges in the application of EU competition law within the digital economy.

The project is coordinated in Greece by the Centre for European Constitutional Law – Themistocles and Dimitris Tsatsos Foundation, with the support of the Hellenic School of the Judiciary (ESDI). The HCC's involvement reflects its strategic commitment to institutional cooperation and legal education on complex competition law issues, particularly in light of the growing importance of digital markets.

As part of the project, the HCC conducted four specialised seminars in December 2025, two at its own premises and two at the National School of the Judiciary in Thessaloniki. These training sessions were

attended by judges from courts across Greece, including representatives from civil, administrative, and competition divisions. The training was delivered by HCC officials — primarily legal experts — who shared practical insights, case law examples, and institutional experience in enforcing competition rules in digital contexts.

The seminars addressed:

- The foundational principles of EU and Greek competition law,
- Challenges in applying competition law to digital platforms and online markets,
- Key enforcement tools and decision-making practices of the HCC,
- Legal and economic concepts relevant to market definition, dominance, and digital collusion,
- The evolving legal landscape regarding data, algorithms, and AI in market behavior.

Through these structured trainings, the HCC empowers judges with the analytical tools needed to understand, assess, and adjudicate on complex digital competition cases. The initiative forms part of a broader training program under CompEUte, which also includes:

- A needs assessment of judges' knowledge gaps,
- Development of innovative blended learning curricula,
- Creation of digital training content for asynchronous future use,
- Study visits to the HCC and the Court of Justice of the European Union,
- A concluding conference to foster cross-border dialogue and judicial networking at the European level.

The HCC's contribution to CompEUte demonstrates its institutional role not only as an enforcement authority but also as a promoter of legal awareness and judicial education. By supporting judges in navigating the intricacies of modern competition law, especially in the digital domain, the Commission reinforces judicial independence, transparency, and the effectiveness of legal remedies — core elements of the rule of law.

d. Hellenic Competition Commission Contributes to the Rule of Law Dialogue – Intervention at the National School of the Judiciary Seminar on Independent Authorities:

On 16 May 2025, the President and Vice-President of the Hellenic Competition Commission (HCC) participated as keynote lecturers in a high-level seminar organised by the National School of the Judiciary (ESDI), titled “Independent Authorities and Their Contribution to a European Democratic Rule of Law.” The seminar formed part of the School's ongoing training program for Greek judicial officers, focusing on the role of independent institutions in upholding democratic values, legal certainty, and institutional balance within the European legal order.

The intervention of the HCC leadership reflected the Commission's growing role not only as a competition enforcement authority, but also as an institution committed to supporting the legal ecosystem and democratic governance in Greece and across the EU. The lecture addressed the multiple ways in which independent regulatory bodies — and competition authorities in particular — reinforce the rule of law, protect market integrity, and promote citizen trust in public institutions.

Key themes of the HCC's contribution included:

- The legal status and institutional guarantees of independence for competition authorities;
- The role of the HCC in ensuring transparency and accountability in market operations;
- How enforcement of competition law prevents abuse of economic power and fosters democratic fairness;
- The importance of inter-institutional cooperation between independent authorities, the judiciary, and the executive branch;
- The European dimension of competition enforcement and the alignment with EU law and principles.

The President of the HCC emphasized the importance of active engagement with the judiciary to cultivate a common understanding of the legal standards and economic rationale underlying competition law. The Vice-President highlighted how competition law acts as a structural pillar for maintaining open markets, limiting arbitrary power, and ensuring fair access to economic opportunities — all fundamental elements of a mature democratic society governed by the rule of law.

By participating in this educational event, the HCC reaffirmed its institutional commitment to spreading legal knowledge, contributing to judicial education, and promoting the values of transparency, legality,

and institutional integrity. This activity complements other recent initiatives by the Commission aimed at strengthening judicial capacity and legal certainty in competition enforcement, particularly in the digital and public procurement sectors.

Together, these actions form a cohesive strategy through which the HCC actively supports the development of a robust European democratic legal order, in which independent authorities and well-informed courts play a decisive role.

III. Media Pluralism and Media Freedom

B. Media authorities and bodies.

1. Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies.

As mentioned in our inputs on RoL 2024 and 2025, the National Council of Radio and Television (NCRTV) is the independent authority that supervises and regulates the radio and television market. Its independence is enshrined in the Greek Constitution and its operation is governed by a set of provisions, including Law 4779/2021 which transposed Directive (EU) 2010/13 concerning the provision of Audio-visual Media Services (AVMSD), strengthening its independence from the Government and other state entities.

a. Update on measures taken to ensure the independence, enforcement powers and adequacy of resources of NCRTV

i. Legal framework – The Law 5253/2025:

Since the publication of the 2025 Rule of Law report, Law 5253/2025 (GG A' 212), partially enforcing Regulation 2024/1083/EE (EMFA), was published, which further strengthens the role of the NCRTV, aiming also the enforcement of its powers and resources.

1. With art. 26 of the said law, NCRTV has been appointed as the competent authority for the implementation of paragraph 1 of article 5 of the above law, on safeguards for the independent operation of public media service providers, and of paragraph 1 of article 18, on the content of media service providers on very large online platforms.

2. According to article 33 of the same law, NCRTV shall also be responsible for the preparation and publication on its website of the annual report on the distribution of state advertising expenditures to media service providers and online platform providers, based on the information of paragraph 2 of article 25 of the Regulation and a relevant recommendation submitted by the General Secretariat of the Hellenic Republic, which has been appointed as the competent authority for the enforcement of article 25.

3. Article 34 of the abovementioned law foresees new enforcement powers for the NCRTV regarding article 27 (Duties of media service providers) and 32 (Provision of information and data).

Under this article, the media regulatory authority by its decision has the authority to impose one or more of the following sanctions on media service providers: a) a recommendation for compliance with a specific provision, with a warning of the imposition of other sanctions and b) a fine of five hundred (500) to ten thousand (10,000) euros. For the imposition of the above sanctions, the NCRTV must call the interested party to a hearing, where in particular the gravity of the violation and the existence of recurrences regarding the issues are considered.

4. Article 36 of the law 5253/2025 brings amendment to paragraph 1 of article 36 of law 4779/2021, that transposed the AVMSD, foreseeing administrative sanctions against media service providers for the respect and protection of human dignity.

Half of the amount of the fines imposed pursuant to the provisions of this law is attributed, through the state budget, to the NCRTV to strengthen its supervisory role. The relevant amounts are recovered through the procedure provided for in the Public Revenue Collection Code (Law 4978/2022, GG A' 190)⁵².

5. New organisational chart: In view of these new competences, NCRTV is in the process to amend its

⁵² The initial draft law also laid down the substantive and procedural rules for the enforcement of Article 22 (assessment of media market concentrations) by the NCRTV, as well as provisions for the further development of the National Media Ownership Database by the Authority. These provisions were ultimately not included in the final law, so that they could be assessed in light of existing, similar provisions—mainly those applicable to free-to-air media providers—in order to avoid imposing parallel and potentially overburdensome obligations on those providers.

organisational chart and to allocate posts between the new units⁵³.

6. It is also envisaged that NCRTV shall be responsible for the enforcement of article 22 par. 3 and 4 of Regulation 2024/900/EE on the transparency and targeting of political ads. NCRTV has actively participated in the drafting of the relevant implementing legal instrument that will, most probably, take the form of a Presidential Decree.

ii. Human resources - Employment of new staff⁵⁴

During 2025 the Authority has acquired seven (7) additional employees, six (6) public servants of different backgrounds and one (1) legal expert. Three of the public servants were assigned with administrative tasks and 3 were placed in the programme department to monitor the political pluralism in the current news programmes of the six free to air nation-wide AVMS.

Therefore, there are currently 43 employees serving at the National Council for Radio and Television, whilst efforts are being made to further strengthen the Authority with new employees in order to ensure that it is adequately staffed in view of the forthcoming licensing procedure of the free to air regional AVMS.

In particular, in the context of the overall strengthening of the NCRTV and in view of its increasing responsibilities, the Government has already formulated a plan for a significant and substantial strengthening of the NCRTVs staff by adding 25 specialized employees to the 57 existing permanent positions, under a procedure that will be included in the upcoming bill on the licensing of regional television stations.

The distribution of the above staff will be carried out upon the recommendation of the NCRTV, while the Council itself will carry out the selection process of the new personnel, in cooperation with the Supreme Personnel Selection Council. At the same time, the same bill will also provide for the establishment of a Special Legal Service Office in the Council, with the aim of optimizing audit procedures and utilizing the existing and new human resources.

iii. Financial resources

As provided for in our inputs of 2024 and 2025, the NCRTV's budget is included in the Annual State Budget under a dedicated line-account and is approved by the Parliament. A significant portion of operational costs is covered by sanctions and fees imposed and fees from audio-visual licensees, creating an element of resource autonomy.

Currently, article 36 of the law 5253/2025 brings amendment to paragraph 1 of article 36 of Law 4779/2021, which transposed the AVMSD, foreseeing administrative sanctions against media service providers for the respect and protection of human dignity.

Half of the amount of the fines imposed based on this law is attributed, through the state budget, to the NCRTV to strengthen its supervisory role. The collection of the relevant amounts is carried out through the procedure of the Public Revenue Collection Code (Law 4978/2022, GG A' 190).

All the above constitute the mechanism to ensure stability, predictability, and transparency, refuting claims of financial dependency or vulnerability of NCRTV.

⁵³ Given the expansion of the NRA's competences beyond its original remit, the NCRTV has noted the need to amend its founding act (Law 2863/2000) to reflect these new responsibilities, including those arising under the DSA, and to ensure adequate investigative and enforcement powers. It has also noted the need to review the framework applicable to free-to-air AVMS providers, particularly as regards media ownership transparency and media concentration, in light of the EMFA.

⁵⁴ As already noted in our contribution last year, in light of the increased responsibilities of the NCRTV (including those arising from the AVMSD, the DSA and the EMFA), and according to data provided by the Ministry of Interior, since 2022 the NCRTV has recruited a total of seventeen (17) new staff members through the procedures of the Supreme Council for Civil Personnel Selection. Recruitment included: seven (7) administrative and financial personnel; five (5) Specialist Scientific Personnel (three lawyers, one economist and one specialist in political and social analysis of communication); two (2) IT specialists; and three (3) specialists in communication and media.

2. Conditions and procedures for the appointment and dismissal of the head / members of the collegiate body of media regulatory authorities and bodies.

Update regarding the cases challenging the legality of the composition of NCRTV pending before the Council of State

The applications for the annulment of decisions of NCRTV, also challenging, among other things, the legality of the composition of the Board, that have been notified to the Authority are two, in particular:

- 1.** The application of the political party POPULAR ORTHODOX ALERT (owner of the radio station under the name ART FM) for the annulment of decision 136/2025 of NCRTV revoking Decision No. 11/21.12.2010 certifying the legal operation of the radio station ART FM, which had been granted to the radio station in 2009 on the basis of Article 50 of Law 3801/2009 (Filing Number 2837/2025).
- 2.** The application of the company under the name AATEP EGO MEDIA AE (owner of the free to air nation-wide AVMS under the name "MEGA") for the annulment of decision 5/2025 of NCRTV imposing a fine of €90,000 on the above company "ALTER EGO MEDIA AE" for violating the provisions on the protection of personality and objectivity in news reporting (Filing Number 829/2025).

It is recalled that, as noted in our contribution last year, the Athens Bar Association's petition challenging the Deputy Minister's appointments to the NCRTV was rejected by the Council of State Plenary on 14 June 2024 (Decision 1639/2024) and is therefore no longer pending.

3. Existence and functions of media councils or other self-regulatory bodies

Independent self-regulation – The Hellenic Media Council (art. 37⁵⁵ of Law 5253/2025):

For the first time, the possibility of establishing an institutional, fully independent self-regulatory body (Media Council) with the participation of journalists, media owners, academics, and civil society, is introduced into national legal order (i.e. art 37 of Law 5253/2025) (56), in accordance with the principles and spirits of the European Media Freedom Act (EMFA) aimed at protecting and promoting sectoral and public dialogue on issues relating to freedom of the press and the media, protecting and strengthening pluralism and editorial independence, adopting measures for media literacy and against misinformation, including the adoption of fact-checking procedures.

The purpose of the above provision is to encourage a reliable, professional and ethical journalism, without state or regulatory interference in the content of information, in full compliance with Article

⁵⁵ More specifically, **article 37 of the above law stipulates** that:

"1. The representative organizations of owners of publications, websites, journalists, holders of licenses or certificates of legal operation of free-to-air radio and television stations and providers of subscription radio and television services may establish the "Hellenic Media Council" (hereinafter the Council), as a self-regulatory body completely independent of any political, governmental or other influence, which aims in particular to:

a) protect and promote sectoral and public dialogue on issues concerning freedom of the press and the media,

b) protect and strengthen pluralism and editorial independence,

c) take initiatives and promote public dialogue, regarding issues concerning:

ca) unfounded or abusive legal proceedings to discourage participation (SLAPPs),

cb) Media Literacy,

cc) Safety of Journalists and

cd) Disinformation, including the adoption of fact-checking procedures,

d) Assistance to media service providers, their editorial staff or any person who, by reason of their regular or professional relationship with a media service provider or its editorial staff, may possess information relevant to the identification of journalistic sources or confidential communications or capable of leading to it, in exercising the right to effective judicial protection in the event of infringements of paragraphs 3 to 7 of Article 4 of Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 on a common framework for media services in the internal market and - Amendment of Directive 2010/13/EU (European Regulation on freedom of the media) (L 17.4.2024).

2. Representatives of the academic community, scientific bodies and civil society bodies may also participate in the Council."

⁵⁶ <https://search.et.gr/el/fek/?fekId=790137>

4(2) of the Regulation, further enhancing the safety of journalists, contributing to the observance of journalistic ethics and combating malpractice, without prejudice to the freedom of the press.

The core mandate of the Hellenic Media Council is: a. the protection and promotion of sectoral and public dialogue on press freedom and media issues, b. the protection and strengthening of pluralism and editorial independence, c. Media Literacy initiatives and actions against disinformation and Slapps, d. Fact-checking procedures for verification of facts.

Furthermore, according to Article 42 of the same law, financial support for the above Council is provided for in an amount of up to one hundred thousand (100,000) euros per year, based on a joint ministerial decision that will determine all the necessary details for the disbursement and payment of the amount.

B. Safeguards against government or political interference and transparency and concentration of media ownership

1. Measures taken to ensure the fair and transparent allocation of state advertising

As provided for in our input on RoL 2025, the Article 9 of Law 2328/1995 (GG A' 159) and the Presidential Decree 261/1997 (GG 186 A') defined the terms and conditions, as well as the procedure for the assignment, transmission or registration of state advertising for public sector bodies implementing communication programs.

a. The new legal framework ensures full state advertising transparency (Art. 27 para 1, art. 31 and art. 33 of Law 5253/2025).

Following the publication of the Rule of Law Report 2025, in the context of harmonization of the Member States with the European Regulation 2024/1083 (European Media Freedom Act, EMFA), with the provisions of the new law 5253/2025 (see art. 27 para 1, art. 31 and art. 33) transparency and accountability in the allocation of state advertising are further strengthened (57).

In particular, following the provisions already legislated for the Print and Electronic Media Registers, the obligation of all public sector bodies to disclose the expenditure allocated for state advertising, is introduced for the first time. In addition, the media themselves are required to disclose the amounts they have received from state advertising. Additionally, an annual report on the allocation of state advertising expenditure is compiled and published.

Based on the above, accountability is fully ensured with regard to the allocation of public funds for state advertising.

⁵⁷ In para. 1 of **article 27** entitled "**Duties of media service providers**" it is stipulated that media service providers shall make public, in a visible and easily accessible manner, to the recipients of their services, in particular on their websites or in another similar medium, the updated information referred to in paragraph 1 of Article 6 of the Regulation. In particular:

Article 31 "Regulations for transparency in public sector advertising" provides that all public sector bodies shall publish:

a) On their website, the expenses they intend to allocate for state advertising or supply or service contracts concluded with media service providers or online platform providers or with third parties with a subject matter relating to state advertising or supply or service contracts with media service providers or online platform providers. The relevant posting shall include, at a minimum and in a clear manner, the description of the object of the expense, the procedure for awarding the relevant contract and its budgeted amount.

b) On their website and on the electronic platform maintained at the SGCOMM, the information referred to in paragraph 2 of article 25 of the Regulation. The relevant postings include, at a minimum and in a clear manner, the description of the object of the relevant expenses and the awarding process of the relevant contracts and the amount of each of them.

Article 33 "Reports" provides that the NCRTV shall draw up and publish on its website an annual report on the allocation of state advertising expenditure to media service providers and online platform providers, based on the information in paragraph 2 of article 25 of the Regulation and a relevant proposal submitted by the SGCOMM. In order to assess the completeness of the information on state advertising made available under paragraph 1 of article 31, the NCRTV may request further information from public authorities, including more detailed information on the application of the criteria and procedures referred to therein.

b. Update on the operation of other instruments in the field of transparency in state advertising

i. The information system “e-Pasithea” continues its operation.

The new, upgraded, modern and functional digital tool (information system) “e-Pasithea”⁵⁸ for both the SGCOMM and public sector bodies, continues its operation at the Secretariat General for Communication and Media (SGCOMM) since September 2024, for the submission of communication programs, reporting state advertising expenditures and activity reports of public sector bodies for approval.

During the year 2025, the e-Pasithea system is constantly enriched with new detailed data of approved communication programs and expenditures. It is to be noted that the Print (MET) and Electronic (MHT) Registries, as well as the Registry of the Audio-visual Media of the NCRTV, are available on the "e-Pasithea" platform, so that public sector bodies can register advertising expenditure exclusively in certified publications or websites and licensed radio and television stations.

In "e-Pasithea", every citizen can have access to detailed data concerning the communication programs of public sector bodies approved by the SGCOMM, as well as to the reporting data of their expenditures.

ii. The relevant circulars:

(a) In order to ensure compliance with the current institutional framework and to safeguard legality and transparency, in the fall of 2025, as every year, a relevant circular was sent to all public sector bodies, as well as to the Media Owners' Associations, regarding the obligation to prepare and submit a communication program for the year 2026, to submit reporting state advertising expenditures and an activity report on the communication actions of public sector bodies and the broader public sector for the year 202559.

(b) In accordance with the provisions of para 1 and 2 of article 22 of Law 5005/2022 (GG A' 236), the registration of advertisements and any other registration or promotion for direct or indirect consideration is carried out, under penalty of invalidity of the contract or order, only in print or electronic media, which is registered in the Print (MET) or Electronic (MHT) Media Registries, respectively, which are kept at the SGCOMM.

To this end, the SGCOMM sent a relevant circular to all competent services with the aforementioned obligation (60).

2. Safeguards against state / political interference, in particular:

- safeguards to ensure editorial independence of media (private and public)

a. The new legal framework – Art. 28 of Law 5253/2025:

Article 28 of the above Law provides for measures to ensure the editorial independence of media service providers. In particular, it provides for the obligation of media service providers providing news and information on current events with journalistic content, regardless of their legal form, to respect and ensure editorial independence in accordance with paragraph 3 of Article 6 of the EMFA Regulation, through appropriate safeguards, in particular, guidelines and policy documents, while indicative content of such safeguards is also provided.

At the same time, the obligation to comply with the principle of proportionality on the part of providers protects the maintenance of their established editorial line, as well as the reasonable right of the owners of private media service providers to set strategic or general objectives or to promote the development and economic viability of their businesses.

⁵⁸ <https://e-pasithea.media.gov.gr>

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<https://diavgeia.gov.gr/doc/9%CE%9A3%CE%9B46%CE%9C%CE%93%CE%A87%CE%9F%CE%9E%CE%A9?inline=true>

⁶⁰ <https://media.gov.gr/wp-content/uploads/2025/11/%CE%95%CE%B3%CE%B3%CF%81%CE%B1%CF%86%CE%BF-%CE%B3%CE%B9%CE%B1-%CE%BA%CF%81%CE%B1%CF%84%CE%B9%CE%BA%CE%AD%CF%82-%CE%B4%CE%B9%CE%B1%CF%86%CE%B7%CE%BC%CE%AF%CF%83%CE%B5%CE%B9%CF%82.pdf>

- Specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal), safeguards for their financial and operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions

a. The new legal framework of Law 5253/2025:

The purpose of the above law is to **strengthen the public character of "Hellenic Radio and Television Limited Company (ERT SA)"** and its position in the context of a highly competitive market and to strengthen the orderly, transparent and effective operation of public radio and television. The objectives of the above law are, among others, the following: a) completing the process of collecting the contribution fee and assigning the cash certificate, and the compulsory collection of receivables that are not collected annually by electricity suppliers to the Independent Public Revenue Service. b) The provision of performance incentives to ERT S.A. staff for the achievement of its objectives and mission. c) the regulation of issues concerning ERT staff, including the provision of performance incentives and the elimination of wage inequalities among the staff of its musical ensembles in relation to the musicians of the Athens State Orchestra, the Thessaloniki State Orchestra, and the Opera Orchestra. d) harmonization with Law 4972/2022 (A' 181 EFE) on corporate governance of public limited companies and with Law No. 5062/2023 (A' 183 EFE) on the system for selecting the management of legal entities in the public sector, and in particular with regard to the selection and appointment of the chairman of the board of directors and the managing director. e) the possibility of setting up a working group on innovation and modern technologies at ERT S.A., the cooperation of the group with public and private bodies with similar objectives and with higher education institutions, as well as its participation in international and European organizations. f) the provision of organizational changes in the administration of ERT SA, such as the increase in the number of members of its Board of Directors from seven (7) to nine (9) and the participation therein of one (1) member of the higher learning institutions, one (1) teaching and research staff and one (1) member with sufficient experience in auditing or accounting or in another field of economic sciences. g) the integration of corporate social responsibility into the institutional framework of ERT SA. h) the establishment of cooperation between ERT S.A. and the Ministry of Education, Religious Affairs and Sport for educational television and the utilization of radio and television content. i) internships and apprenticeships at ERT by trainees of vocational education and training structures and higher education students. j) the establishment of a framework for international relations and collaborations of ERT and its outreach. k) The evaluation of the public response to the performance of the public service assigned to ERT SA, using modern technical methods and means.

b. Specifically, the Article 14⁶¹ of Law 5253/2025 on the control and supervision of ERT S.A.:

ERT SA has administrative and financial autonomy, is organized and operates in accordance with the provisions of Law 4173/2013⁶², as recently amended by Law 5253/2025 and the specific provisions

⁶¹ Article 10 of Law 4173/2013 on supervision - control of E.R.T. S.A., as replaced by Article 10 of Law 4324/2015 (GG A 44), was amended as follows by Article 14 of Law 5253/2025, Government Gazette A 212/25.11.2025:

1. The National Broadcasting Council (E.S.R.) is responsible for the supervision of E.R.T. S.A. with regard to its broadcast programming and compliance with the general principles governing the content provided, and publishes an annual report on this matter.

2. The ESR is responsible for supervising ERT SA with regard to the fulfillment of its public service obligations and compliance with European Union law on state aid to public radio and television.

3. ERT S.A. shall submit to the Institutions and Transparency Committee of the Hellenic Parliament and to the NCRTV, three (3) months after the approval of the annual financial statements by the Ordinary General Meeting, a report on the transparency of the use of the license fee. This report shall be posted on the websites of ERT S.A., the NCRTV, and the General Secretariat for Communication and Information.

4. The Company is supervised, in matters of operation and responsibilities, by the Minister, who is entrusted with the responsibilities of the General Secretariat for Communication and Information, without prejudice to the provisions concerning the relevant responsibilities of the National Broadcasting Council. The financial supervision of the Company is exercised by the Minister of National Economy and Finance.

⁶² ERT SA, as defined in Law no. 4173/2013, is supervised by different bodies with distinct roles: the Secretariat General for Communication and Media (SGCOMM), the National Council for Radio and Television (NCRTV) and the

governing public limited companies.

In accordance with the provisions of article 10 of Law 4173/2013, as amended by art. 14 of law 5253/2025, the control of ERT SA regarding the broadcast program and the observance of the general principles of the provided content is carried out by the NCRTV, which publishes a relevant report annually.

The new law determines the period within which ERT SA submits to the Parliament's Institutions and Transparency Committee and to the NCRTV a report on the transparency regarding the use of the contribution fee within three (3) months after the approval of the annual financial statements by the General Assembly. This report is posted on the website of ERT SA, the NCRTV, and the SGCOMM. This provision aims to further ensure transparency of the actions of ERT SA.

c. Specific safeguards introduced and still in force:

It should be also noted that according to our inputs on ROL 2024 and 2025, specific safeguards have been introduced and are still in force enhancing the independence of heads of management and members of the governing board of ERT SA, as well safeguards for the financial and operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions, indicatively:

i. Law 5062/2023⁶³, which has already brought into force the new system for selecting public sector

Ministry of National Economy and Finance. The Company is supervised, for matters of its operation and responsibilities, by the Minister who is assigned the responsibilities of the SGCOMM, without prejudice to the provisions concerning the relevant responsibilities of the National Council for Radio and Television. In particular, the administrative supervision of ERT SA falls under the Department of Supervised Bodies and Communication Programs of the Secretariat General for Communication and Media of the Presidency of the Hellenic Government, a structure that has existed for decades and is staffed by civil servants (Presidential Decree 98/2020). This administrative supervision ensures ERT's compliance with legal and regulatory provisions. Finally, the financial supervision of ERT SA is exercised by the Minister of National Economy and Finance.

⁶³ More specifically, the law has established a selection process based on transparent and fair criteria under the supervision of the constitutionally established Independent Authority of the Supreme Council for Civil Personnel Selection (A.S.E.P.), in accordance with the provisions of Article 4 of the above-mentioned law.

Specifically, the selection process for the Chairman of the Board of Directors and the Managing Director includes:

- issuance of a call for expressions of interest by the supervising Ministry, following the approval of the A.S.E.P.
- written examination of candidates
- compilation of a list of candidates based on the results of the written examination
- verification of the required qualifications of the candidates who rank in the top fifteen (15) positions
- scoring of eligible candidates based on formal educational qualifications and experience
- preparation of provisional lists
- submission of appeals within an exclusive period of five (5) days
- examination of appeals by the competent selection committee within a period of eight (8) days and posting of final lists
- interviewing the top 7 eligible candidates
- drawing up a list of the three (3) most suitable candidates by the competent selection committee, which is sent to the supervising Minister.
- Selection of one (1) of the three candidates from the above list and appointment by decision of the company's General Assembly, following a recommendation by the competent Minister.

Upon completion of the procedure provided for by law, by a five-member independent committee chaired by a member of A.S.E.P., and by decision of the General Assembly, the Chairman of the Board of Directors and the Managing Director of ERT SA are appointed.

The role of the Deputy Minister is strictly limited to proposing a candidate to the General Assembly from the list of the three most prominent candidates selected by the independent authority's selection committee. This procedure is described in the relevant law 5062/2023 "New system for selecting public sector administrations, enhancing their efficiency and other provisions" of the Ministry of Interior and applies to all legal entities in the public sector. These candidates are selected through a rigorous, transparent, and multi-level evaluation process by the independent authority A.S.E.P. Particularly for ERT SA, the decision of the General Assembly was preceded by the prescribed procedure of a parliamentary hearing for the formulation of an opinion by the Standing Committee on Institutions and Transparency of the Parliament, which is a transparent and public process of parliamentary control and consensus, broadcast live on the Parliament channel.

administrators, which establishes a coherent and comprehensive framework for selecting the management of public sector legal entities in accordance with the constitutional principles of equality and meritocracy, with particular emphasis on the essential qualifications required.

ii. There are special provisions/safeguards in force, according to which the term of office of the Chairman of the Board of Directors and the Managing Director shall terminate prematurely (para 1 of Article 10 of Law 5062/2023).⁶⁴

iii. The provisions of Article 8 of Law 4972/2022 applies to all members of the Boards of Directors (including the Chairman of the Board of Directors and the Managing Director).

In particular, a member of the Board of Directors whose appointment was made in violation of the conditions for appointment under Article 8 of Law 4972/2022 (prohibition from being Chairman, Vice-Chairman, Managing Director or member of the Board of Directors of another company, not having the required qualifications for appointment, not being eligible for appointment as a civil servant) shall be dismissed immediately upon discovery of the violation.

iv. Specifically, for ERT SA, the position of member of the Board of Directors (including the Chairman of the Board and the Managing Director) is incompatible (para 3 of Article 9 of Law 4173/2013): a) with the capacity of supplier or, in general, counterparty of ERT SA under a contract for work or services, b) with participation in any way in another company related to the media, c) with the capacity of member of the Board of Directors in trade unions and associations of ERT SA employees, d) as a member of the Government, a member of parliament, an elected representative of local government, or a civil servant holding a position in a political party.

The term of office of the other members of the Board of Directors shall be terminated if it is found that they do not meet the conditions under which they were appointed (impediments and incompatibilities as mentioned above).

- information on specific legal provisions and procedures applying to media service providers, including as regards granting/renewal/termination of licences, company operation, capital entry requirements, concentration, and corporate governance

a. The extension of licensing deadlines for regional television and radio stations.

By law 5263/2025 (GG A' 238) the licensing deadlines for regional television stations and radio stations were extended to 31.12.2026.

b. The draft laws on licensing:

i. The draft law on the licensing process of free-to-air terrestrial digital television broadcasting content providers with regional scope:

In August 2025, the draft Law under the title "Licensing of free-to-air terrestrial digital television

As regards the selection of the other members of the Board of Directors of Public Limited Companies (other than the Chairman and the Managing Director), Law no. 4972/2022 applies, which provides for their election by the General Assembly of the Companies, based on increased mandatory qualifications (higher education degree, at least five years of work experience), following a recommendation by the competent Minister. The Boards of Directors of public limited companies include employee representatives, who are elected by direct, secret, and universal vote by the employees.

The members of the Board of Directors are appointed for a fixed term, enjoy personal and functional independence in the exercise of their duties, and are subject to the law.

⁶⁴ In the event of a) their resignation, b) deprivation of personal liberty following a temporary detention order or court decision, even in the case of dismissal with bail, c) permanent inability to perform their duties for reasons of health or disability (physical or mental)

The term of office may also be terminated:

a) by decision of the General Assembly due to failure to achieve the objectives set out in the Performance Contract, which includes annual objectives and actions to be implemented during their term of office.

b) by decision of the General Assembly in cases of clear indications of unlawful exercise of duties, based on a report by the competent Inspector or criminal prosecution for an offense that may result in dismissal from service.

broadcasting content providers with regional scope and other provisions" was presented to the Council of Ministers⁶⁵. Under the provisions of the said draft law, the National Council for Radio and Television (NCRTV) will be the competent supervisory authority for the licensing procedure and will continue to supervise the operation of television stations. Instead of a fee for obtaining a license annual supervision sum to be paid in favour of the NCRTV is foreseen, in order to strengthen its financial and operational capacity.

In addition, the operating conditions are streamlined and rules are set, significantly strengthening the supervisory work of the NCRTV. Finally, the framework for adaptation to the technological broadcast standard (DVB-T2) is created, so that all regional television stations broadcast in high definition (HD).

All candidates wishing to be licensed by the NCRTV must meet certain minimum requirements, such as: tax and insurance compliance, transparency regarding ownership status, with the disclosure of each shareholder who owns at least 5% of the business, Criminal record check, minimum number of employees, journalists and non-journalists, minimum of necessary building facilities and basic equipment, completeness of the broadcasting program.

The draft law will be finalised in the following months and the licensing process will commence within 2026.

ii. Furthermore, within the next three (3) months, the relevant draft bill regarding the licensing process of radio stations will be presented to the Council of Ministers.

3. Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners

a. The continuous and effective operation of the electronic MET and MHT Registries:

As already mentioned in our input on RoL 2025, Law 5005/2022 focuses, inter alia, on transparency of media ownership.

Transparency in media ownership continues to be strengthened with the almost three-year operation of the electronic MET⁶⁶ and MHT⁶⁷ Registries and the institutional establishment of the conditions for certification of printed materials and websites in the MET and MHT Registries, respectively.

The operation of the MET and MHT Registries for almost three years has resulted to the certification of 395 publications and 641 electronic press websites. The large number of certified print and electronic press websites demonstrates the widespread acceptance of the MET and MHT electronic registers by print and electronic press businesses.

b. Law 5212/2025: further changes upgrading the implementation of the electronic Registries MET and MHT

Specifically, the journalistic profession and quality journalism have being strengthened as the obligation of having signed articles in both print and electronic media is introduced, bureaucracy is reduced by simplifying the registration and registration renewal procedures, the relevant deadlines for both registries are extended, changes are being made to the proof of actual operation and circulation of publications.

In addition, a sample-based administrative inspection system is introduced, with a planned annual rate of 15% for individual categories of print and electronic media, as well as on-site inspections of a randomised sample amounting to at least 5% per year of all certified print publications and at least 3% of all electronic media.

Immediately after the publication of Law 5212/2025, the amendments and additions brought thereunder were notified with the circular E/2760/11.07.2025 of the Secretariat General for Communication and Media (Directorate for Media) to all associations of owners of printed and electronic media as well as radio and television stations, in order for them to inform their members accordingly.

⁶⁵ <https://media.gov.gr/parousiasi-sto-ypourgiko-symvouliao-tou-schediou-nomou-adeiodotisi-parochon-periechomenou-epigeias-psifiakis-tileoptikis-evryekpompis-elftheris-lipsis-perifereiakis-emveleias-kai-loipes-diatakseis/>

⁶⁶ <https://mt.media.gov.gr/submissions/MET/public/>

⁶⁷ <https://mt.media.gov.gr/submissions/MHT/public/>

c. The new provisions on the transparency – Laws 5212/2025 and 5005/2002:

- i. It should be reminded that initially, under the provisions of Law 5005/2022, the printed or electronic press company is obliged, as a condition for its certification in the electronic MET and MHT Registries, respectively, to indicate in a prominent place on the printed material or website, the company's name, the registered office of the company, the names of the shareholder or partner who directly or indirectly holds half of the shares or company shares, the publisher (for the printed press), the legal representative, the director and the editor-in-chief, as well as the administrator and the beneficiary of the domain name (for the electronic press).
- ii. Following the amendment of Law 5005/2022 by Law 5212/2025, transparency in the ownership status has been further strengthened, as the above obligation is extended to the names of the shareholders or partners who holds, directly or indirectly, at least twenty-five percent (25%) of the shares or company shares (compared to at least 50% that was in force before), in compliance with the European Media Freedom Act.
- iii. Furthermore, the upcoming draft law on regional television licenses will include a provision establishing the national media ownership database in compliance with the European Media Freedom Act.

d. The continuous operation of the Committee of Deontology of Article 25 of Law 5005/2022:

The relevant independent Committee for the observance of the principles of journalistic ethics and deontology of Article 25 of Law 5005/2022 continues its operation for the third year of its term. In April 2025, the aforementioned Committee was reconstituted⁶⁸ as the two-year term provided for in the law was completed. It should be noted that this committee consists of nine (9) members and an equal number of alternates, who are widely recognized in the field of media and are appointed by the institutions themselves.

e. Radio, television, new audio-visual media services:

The National Council of Radio and Television, maintains registries for both operating radio stations⁶⁹ and national and regional TV channels⁷⁰, as well as a corresponding registry for new audio-visual services⁷¹ pursuant to the provisions of Law 4779/2021. These registries are exclusively under the control and jurisdiction of the NCRTV and the included information is also available in the Council of Europe's MAVISE⁷² database, which is updated on a monthly basis and operates as a central database providing information on the country of jurisdiction of television channels, on-demand services and video-sharing platforms, in accordance with Directive 2018/1808 on audio-visual media services.

C. Framework for journalists' protection, transparency and access to documents

1. Rules and practices guaranteeing journalist's independence and safety, including as regards protection of journalistic sources and communications, referring also, if applicable, to follow-up given to alerts lodged with the Council of Europe's Platform to promote the protection of journalism and safety of journalists.

Greece has demonstrated in practice that it has implemented structural and substantive reforms on guaranteeing journalist's independence and safety. The targeted legislative and administrative initiatives of recent years are not merely fragmentary measures, but are part of a broader strategy to

⁶⁸chrome-

extension://efaidnbmnnnibpajpcglclefindmkaj/https://diavgeia.gov.gr/doc/9%CE%9A%CE%97%CE%9646%CE%9C%CE%93%CE%A87-%CE%9C%CE%942?inline=true

⁶⁹ <https://www.esr.gr/%cf%81%ce%b1%ce%b4%ce%b9%cf%8c%cf%86%cf%89%ce%bd%ce%bf/>

⁷⁰ <https://www.esr.gr/%ce%b5%cf%80%ce%af%ce%b3%ce%b5%ce%b9%ce%b1-%cf%84%ce%b7%ce%bb%ce%b5%cf%8c%cf%81%ce%b1%cf%83%ce%b7/>

⁷¹ <https://www.esr.gr/%ce%bd%ce%ad%ce%b5%cf%82-%cf%85%cf%80%ce%b7%cf%81-%ce%bf%cf%80%cf%84%ce%b9%ce%ba%ce%bf%ce%b1%ce%ba%ce%bf%cf%85%cf%83%cf%84%ce%b9%ce%ba%cf%8e%ce%bd-%ce%bc%ce%ad%cf%83%cf%89%ce%bd/>

⁷² <https://mavise.obs.coe.int/>

strengthen the guaranteed under Article 14 of the Constitution freedoms of expression and freedom of the press.

a. The Memorandum of Understanding is still in force:

On 23 May 2022, Greece took a significant step forward, as has been reflected in previous Rule of Law Reports, by signing a Memorandum of Understanding (MoU), at the initiative of the Secretariat General for Communication and Media of the Presidency of the Hellenic Government and with the participation of five other Ministries, which is still in force.

The MoU underlines Greece's commitment to complying with international and regional standards, is aligned with landmark European and international texts, such as Commission Recommendation (EU) 2021/1534 on ensuring the protection, safety and empowerment of journalists and other media professionals in the European Union, and provides the fundamental framework for subsequent initiatives that have strengthened media protection in Greece, taking into account European standards for the protection of journalists.

b. The Task Force is continuing its work:

i. The renewal of its term and its new composition

The Task Force on the Protection, Safety and Empowerment of Journalists and Media Professionals, established in July 2022, **renewed its mandate for the fourth consecutive year**, whilst **representatives from two (2) new institutions were added**, in order to further enhance its structure and role: the Hellenic Coastguard and the National Cybersecurity Authority (GG B' 6728/2025)⁷³.

ii. The participation of the Task Force in the preparation of the National Action Plan for the Safety of Journalists - Article 40⁷⁴ of Law 5253/2025:

Under the article 40 of the new Law 5253/2025 (GG A' 212)⁷⁵, new competencies were introduced for the Task Force. More specifically, **a National Action Plan for the Safety of Journalists is foreseen, with clear timelines, monitoring and evaluation mechanisms**. The above National Action Plan for the Safety of Journalists (Action Plan) is established, with the aim of holistically addressing threats to the physical, psychological and professional safety of journalists, strengthening their protection in the field, as well as strengthening the institutional response to phenomena of violence, intimidation or surveillance. This Action Plan will be drawn up **with the contribution of the Task Force for the Safety and Empowerment of Journalists, ensuring a coherent strategy for the implementation of reforms and the delivery of concrete results, in the immediate future**.

The Action Plan includes in particular: a) recording incidents of threats or violence against journalists and other media professionals, b) development of early warning and support mechanisms, c) planning

⁷³ <https://search.et.gr/el/fek/?fekId=791009>

⁷⁴ Article 40 of law 5253/2025 states that:

"1. A National Action Plan for the Safety of Journalists (Action Plan) is hereby established, with the aim of holistically addressing threats to the physical, psychological and professional safety of journalists, strengthening their protection in the field, as well as strengthening the institutional response to phenomena of violence, intimidation or surveillance.

2. The Action Plan is drawn up by the Secretariat General for Communication and Media, following a recommendation from the Task Force on the Protection, Safety and Empowerment of Journalists and Media Professionals, and is approved by decision of the Minister to whom the responsibilities of the Secretariat General for Communication and Media have been assigned.

3. The Action Plan includes in particular:

- a) recording incidents of threats or violence against journalists and other media professionals,
- b) development of early warning and support mechanisms,
- c) planning and implementation of educational actions and development of synergies,
- d) strengthening of cross-sectoral cooperation,
- e) Connection with European mechanisms and institutions.

4. The Secretariat General for Communication and Media is responsible for monitoring, coordinating and evaluating the implementation of the Action Plan, as well as for issuing an annual progress report, which is published on its website.

5. The Action Plan is updated every three years or earlier, if significant developments occur at national, European or international level."

⁷⁵ <https://search.et.gr/el/fek/?fekId=790137>

and implementation of educational actions and development of synergies, d) strengthening of cross-sectoral cooperation, e) connection with European mechanisms and institutions.

c. Trainings organised by the International Training Center for the Safety of Journalists and Media Professionals (ICSJ):

Among the most prominent initiatives of the Task Force is the creation of the International Training Center for the Safety of Journalists and Media Professionals⁷⁶.

Under the coordination of the International Training Centre for the Safety of Journalists (ICSJ) along with the Peace Journalism Lab, the School of Journalism and Mass Communications of Aristotle University Thessaloniki, the Jean Monnet Chair for European Public Diplomacy, and the Hellenic Multinational Peace Support Operations Training Center organize the annual "Safety for Journalists" Training School, with the support of Secretariat General of Communication and Media, Digital Communication Network Global, Journalists Union of Macedonia and Thrace and Friedrich Newman foundation, **the third "Safety for Journalists" Training School will take place between 16-18 March 2026⁷⁷.**

This three-day program is designed to provide journalists with both theoretical and practical knowledge to be able to respond to war zones or hazardous environments (Hazardous Environment Awareness Training - HEAT). It includes topics such as field safety, first aid, survival in hostile environments, digital security and information management, with the aim of strengthening international protection of press freedom and giving journalists tools to safely cover conflict. The school is held at the Multinational Peace Operations Support Center and includes practical field training from a certified Special Forces center of the Hellenic Army.

d. International Conferences by the ICSJ:

i. **For the year 2025,** ⁷⁸the International Center organised **the second International Conference on the Safety of Journalists between 14-15 June** under the title "From risk to resilience: a multidisciplinary approach to global journalist safety"⁷⁹.

ii. **The third annual Conference will be held between 19-20 March 2026** under the title "Bearing witness: Trauma and resilience in modern journalism"⁸⁰, following the annual "Safety for Journalists" training between 16-18 March. The conference will bring together journalists, academics, mental health professionals, and media ethicists to critically examine the intersection of trauma and journalism.

It will explore practical, ethical, and theoretical frameworks for reporting on sensitive issues while prioritizing the well-being of both the subjects of the news and the journalists themselves. Its goal is to foster a dialogue that moves beyond awareness and toward actionable strategies for building resilience, promoting ethical practice, and creating a more trauma-informed media landscape.

Regarding the operation of the International Training Center, consultations have begun regarding its regular funding in order to ensure its sustainability, as well as relevant discussions on its development and relocation to new premises, in collaboration with the Journalists Union of Macedonia and Thrace.

⁷⁶ Among the most prominent initiatives of the Task Force is the creation of the International Training Center for the Safety of Journalists and Media Professionals⁷⁶. In January 2023, the International Training Center for the Safety of Journalists and Media Professionals (ICSJ) was created, at the initiative of the Secretariat General for Communication and Media, with the participation of members of the Task Force, including Journalists' Associations, Universities and Public Service Media. The ICSJ is under the scientific supervision of the Peace Journalism Laboratory of the Department of Journalism and Media of the Aristotle University of Thessaloniki and provides high-level training and research.

⁷⁷ <https://icsj.net/index.php/el/training-school>

⁷⁸ ICSJ organised an international conference on journalists' safety under the title "Safeguarding Journalists: Mapping the field", between 20-22 September 2024⁷⁸, with over 100 participants from all over the world. The conference addressed the challenges faced by journalists worldwide and explored strategies to ensure their safety, while upholding the principles of free speech and independent journalism through panel discussions, workshops, presentations, and networking sessions.

⁷⁹ <https://icsj.net/images/conference2025/SAFETY%20Agenda%20FINAL.pdf>

⁸⁰ <https://icsj.net/index.php/el/conference-2026>

e. Council of Europe Platform to promote the protection of journalism and the safety of journalists:
The continuous constructive relationship of Greece with the Council of Europe Platform to promote the protection of journalism and safety of journalists

Greece continues its constructive relationship with the Council of Europe Platform to promote the protection of journalism and safety of journalists, in order to ensure accountability and the fulfilment of commitments under the European Convention on Human Rights on the protection of freedom of expression:

i. It is important to mention **that during year 2025, only 4 new alerts were registered on the Platform, of which 3 have already been replied by the state, while the deadline for the expected reply on the 4th one is on the 19th March 2026.**

ii. **On the 10th and 17th December 2025**, the partner organisations to the Platform marked the following seven (7) alerts as “resolved”, concluding they was no longer an active threat to media freedom:

N°244/2023 - Journalist Romain Chauvet Sentenced to Prison over Alleged Dissemination of False Information ⁸¹

N°42/2015 - Police Assault Against a Photographer in Greece ⁸²

N°308/2022 - Greek Photojournalist Nikos Pilos Arrested and Charged ⁸³

N°102/2018 - Three Fileleftheros Journalists Detained After Defence Minister Files Libel Complaint ⁸⁴

N°22/2019 - Athens Review of Books faces risk of closure after a politician in defamation case obtained a freeze on its bank accounts ⁸⁵

N°4/2017 - A Greek Newspaper Publisher and Director Charged with Libel ⁸⁶

N°64/2016 - Sport Journalist Kyriakos Thomaidis Faces Arrest after Police Raid on Skai TV's Building ⁸⁷

More than 80% of all alerts concerning Greece have received a formal reply — a response rate far above the European average, which remains under 50% (reference date 12.01.2025). These numbers reflect a greater mobilization of institutions and a willingness to engage with scrutiny.

f. Council of Europe “Journalists Matter” Campaign:

Greece continues to be an active partner in the five-year long “Journalists Matter” Campaign of the Council of Europe, where the Secretary General for Communication and Media acts as the National Focal Point for the country, showcasing the importance of the project for the national authorities⁸⁸.

For the year 2025, the SG for Communication and Media **attended the third National Focal Points meeting followed by the Annual Thematic Conference**: Building the paradigm against impunity of crimes against journalists **that took place in April in the city of Luxembourg**⁸⁹. Furthermore, the SGCOMM invited a representative of the Greek Ministry of Justice and lecturer of the National School of Judiciary to attend the Training of Trainers on SLAPPs (Strategic Lawsuits Against Public Participation), **between 9-10 October 2025 in Prague, following the formal invitation by the Council of Europe, in order to maximize the benefits of the training**⁹⁰.

⁸¹ <https://fom.coe.int/en/alerte/detail/107640210;globalSearch=false>

⁸² <https://fom.coe.int/en/alerte/detail/12102405;globalSearch=true>

⁸³ <https://fom.coe.int/en/alerte/detail/107638266;globalSearch=false>

⁸⁴ <https://fom.coe.int/en/alerte/detail/39656556;globalSearch=false>

⁸⁵ <https://fom.coe.int/en/alerte/detail/44920458;globalSearch=false>

⁸⁶ <https://fom.coe.int/en/alerte/detail/22200662;globalSearch=false>

⁸⁷ <https://fom.coe.int/en/alerte/detail/17857175;globalSearch=false>

⁸⁸ <https://www.coe.int/en/web/freedom-expression/greece-national-chapter>

⁸⁹ <https://www.coe.int/en/web/freedom-expression/annual-thematic-conference-2025>

⁹⁰ https://www.coe.int/en/web/freedom-expression/training-of-trainers-on-slapps-strategic-lawsuits-against-public-participation-?p_l%20back_url=%2Fen%2Fgroup%2Ffreedom-expression%2F%7E%2Fcontrol_panel%2Fmanage%3Fp_id%3Dcom_liferay_layout_admin_web_portlet_GroupPagesPortlet%26p_l_lifecycle%3D0%26p_p_state%3Dmaximized%26p_p_mode%3Dview%26_com_liferay_layout_admin_web_portlet_GroupPagesPortlet_tabs1%3Dpages%26_com_liferay_layout_admin_web_portlet_GroupPagesPortlet_privateLayout%3Dfalse%26_com_liferay_layout_admin_web_portlet_GroupPagesPortlet_displayStyle%3Dmiller-columns%26p_r_p_selPlid%3D138797116%26p_r_p_layoutSetBranchId%3D0%26p_p_auth%3DXvtuxUxK

g. The Collective Labor Agreement:

In the year 2026, in the same spirit of cooperation with journalist associations and in the continuous effort to improve the working conditions and terms of journalists, **the two-year Collective Labor Agreement will be renewed.**

h. The contribution of the Hellenic Police:

The Hellenic Police remains firmly committed to protecting human rights, promoting the safety of journalists, and ensuring transparency in the media, in full compliance with the principles of the rule of law and the international obligations undertaken by our country.

Within the framework of enhancing transparency and strengthening the national contribution to the protection of freedom of expression in the media, the Hellenic Police regularly provides information and statistical data regarding alerts published on the Council of Europe Platform for the Protection of Journalism and the Safety of Journalists.

This information is intended to support the systematic monitoring of the conditions under which freedom of the press operates in Greece, while also highlighting practices aimed at preventing and addressing threats or intimidation of journalists.

It is recalled that, under Article 40 of Law 4622/2019 (as amended), the Communication and Information Office of the Ministry of Citizen Protection is responsible for informing the media about the Ministry's activities, promoting its work, coordinating publications, managing events and press conferences, overseeing the Ministry's website, and supporting consultations with social partners and civil society. It also manages advertising and public awareness campaigns.

The Office additionally serves as the Press Office of the Hellenic Police, supporting the Police Spokesperson, drafting and distributing press releases, responding to media coverage, developing media relations, and managing communication during critical incidents in line with the Incident and Crisis Management Plan "POLYDEUCES." Specific communication plans may be implemented in coordination with relevant Police services according to the Strategic and Operational Program of the Hellenic Police (S.O.P.H.P.).

Through its management of the Ministry's and Hellenic Police's websites and official social media accounts (Facebook, Instagram, X, LinkedIn, YouTube), the Office provides regular updates to the public on Ministry and Police activities, including preventive actions and corruption-related cases⁹¹.

2. Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists.

a. The participation of the Hellenic Police in the Task Force:

A member of the Communication and Information Office of the Ministry of Citizen Protection participates as a member in the Task Force on "Ensuring the Protection, Safety, and Empowerment of Journalists and Other Media Professionals," coordinated by the General Secretariat for Communication and Information of the Presidency of the Government.

The above Office has also been invited to appoint representatives of the Ministry of Citizen Protection to this Working Group. To this end, two (2) officials (one as regular member and one as alternate) were proposed and subsequently appointed as members by relevant decisions of the Secretary General for Communication and Information, which were also published in the Government Gazette.

As part of the operation of this Working Group, its members meet - mainly - once a month, where they discuss various issues related to the journalism profession and plan actions and interventions to be implemented in the future.

⁹¹ In 2025, the Office published at least 14 press releases regarding corruption cases handled by the Internal Affairs Service of the Security Forces, including bribery, abuse of authority, and dereliction of duty, as well as a press release on the International Anti-Corruption Day conference. Additionally, at least 9 announcements were issued regarding Sworn Administrative Investigations and suspension measures against police officers.

b. The National Plan for the Management of Open-Air Public Assemblies still in force:

The National Plan for the Management of Open-Air Public Assemblies, aimed at improving the management of demonstrations by journalists and media professionals, which has been included in the previous reports on the rule of law, remains in full force as of 2021.

c. The study program of the Hellenic Police Academy and the new course:

i. In addition to the above, **in 2025, a new course on freedom of expression and the safety of journalists was introduced into the study/training program of the Hellenic Police Academy.**

Specifically:

The Hellenic Police, **in collaboration with UNESCO and the ICSJ**, introduced a new course entitled: "Freedom of expression and information – Freedom of the press" in the Constitutional Law – Human Rights course in the first year of the Greek Police Academy.

The new course, which is a result of the Ministry of Citizen Protection's participation in the Working Group on the Protection, the Safety and Empowerment of Journalists and Other Media Professionals, **focuses on topics such as the role of journalism as a pillar of democracy, hate speech as a restriction on freedom of expression, the protection of rights in the European Union, the Organization for Security and Co-operation in Europe (OSCE) and UNESCO, the adoption of international standards for freedom of expression, and protection against the spread of fake news.**

The lectures will be organized with the participation of representatives of the journalistic community and police officers, with the aim of strengthening dialogue, foster mutual understanding, and develop practical cooperation that will contribute to the protection of rights and the strengthening of trust and interaction between the police and the media.

ii. It is worth noting that **the topics of the Task Force** on Ensuring the Protection, Safety, and Empowerment of Journalists and Other Media Professionals **have been incorporated into the approved curriculums for the 2025-2026 academic year** at the Police Academy and the Police Academy (Police Academy), as follows:

1. POLICE ACADEMY (POLICE SCHOOL)

Course: "CONSTITUTIONAL LAW – HUMAN RIGHTS" (1st year – 1st semester):

Freedom of expression and information. Freedom of the press. The role of journalism as a pillar of democracy. Democracy, public order, and the media. Hate speech as a restriction on freedom of expression. Protection of freedom of expression rights in the European Union, the OSCE, and UNESCO – International standards for freedom of expression. Dissemination of fake news.

2. POLICE ACADEMY (POLICE CONSTABLES SCHOOL)

Course: "CONSTITUTIONAL LAW – HUMAN RIGHTS" (1st Year – 1st Semester):

Freedom of expression and information. Freedom of the press. The role of journalism as a pillar of democracy. Democracy, Public Order, and the Media. Hate speech as a restriction on freedom of expression. Protection of freedom of expression rights in the European Union, OSCE, and UNESCO – International standards for freedom of expression. Dissemination of fake news.

3. POLICE OFFICERS SCHOOL

Course: "CONSTITUTIONAL LAW – HUMAN RIGHTS" (1st Year – 2nd Semester):

Freedom of expression and information. Freedom of the press. The role of journalism as a pillar of Democracy. Democracy – Public Order – Media. Hate speech as a restriction on freedom of expression. Protection of rights in the European Union, OSCE, and UNESCO. International standards for freedom of expression. Dissemination of fake news.

iii. The approved lecture on the safety of journalists

Additionally, to the above, a lecture was approved for the aforementioned Schools titled: "The nature of the work of journalists and police officers and how they interact in the field – Practical demonstration," as follows: For the Police Academy (Police Constables School), in the 3rd year of studies (5th Semester). For the Hellenic Police Officers School, in the 1st and 4th years of studies.

iv. The ongoing training on the Safety of Journalists and Media Professionals

During the period from June 18th 2024 to June 21st 2024, training on the Safety of Journalists and

Media Professionals was conducted under the supervision of the International Training Center and the scientific responsibility of the School of Journalism and Mass Communications of the Aristotle University of Thessaloniki. This was supported by UNESCO, in cooperation with the Hellenic Police Post-Graduate and Lifelong Learning School of Northern Greece, with the participation of twenty-nine (29) Hellenic Police Officers (in person and remotely) and fourteen (14) Journalists (in person and remotely). Via the Recommendation Note 1730/25/1543980 dated July 17th, 2025, the Leadership of the Hellenic Police decided to implement similar training during the year 2026.

3. Access to information and public documents by public at large and journalists (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information).

As provided for in our input on RoL 2025, the Council of Europe's Tromsø Convention on the right of access to public documents has been fully incorporated into Greek law with the entry into force of Law 5143/2024 (GG A' 161), which completely reformed Article 5 of the Code of Administrative Procedure, which enshrines the above fundamental right.

In fact, the Permanent Representative of the Greek State to the Council of Europe has already stated in its Plenary Session that the country **has fulfilled all its obligations in this regard with this regulation and the relevant secondary regulatory provisions.**

4. Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits.

a. Protective legal framework at safeguarding journalism and freedom of expression:

As already mentioned in our inputs on RoL 2024 and 2025, Greek law provides a robust and protective legal framework aimed at safeguarding journalism and freedom of expression, while effectively discouraging abusive or manifestly unfounded legal actions against journalists, in line with EU standards and Commission Recommendation (EU) 2022/758. In particular:

i. Decriminalisation of simple defamation: Article 362 of the Criminal Code was repealed by Law 5090/2024, removing criminal liability for journalistic reporting of facts or value judgments in the public interest. Criminal liability is now limited to intentional dissemination

of knowingly false information aimed at harming another person's reputation (criminal slander).

ii. Limits on civil liability claims: Claims for civil liability based on conduct amounting to simple defamation are no longer admissible before civil courts, significantly reducing the scope for abusive compensation claims against journalists.

iii. Mandatory pre-litigation procedure for claims against the press: Pursuant to Article 5 of Law 1178/1981, plaintiffs must seek in natura redress by requesting the publication of a corrective statement before initiating legal proceedings. Failure to comply results in the claim being declared inadmissible. Courts strictly apply the pre-litigation requirement, often dismissing claims ex officio if the procedure has not been followed, effectively deterring abusive litigation.

iv. Proportional and reasonable compensation: Even in cases where claims are upheld, courts apply Article 932 of the Civil Code to award damages for moral harm that are fair, proportionate, and tailored to the **parties'** economic circumstances, preventing excessive awards.

For further details on the above provisions of national law, please refer to the detailed presentations in our 2024 and 2025 RoL contributions.

b. Recent developments:

i. Transposition of the Anti-SLAPP Directive into National Law Greece's commitment to transpose Directive (EU) 2024/1069 on SLAPPs by May 2026:

Greece has committed to transposing Directive (EU) 2024/1069 on the protection of public participation from abusive litigation (SLAPPs) by the deadline (May 2026). By Ministerial Decision (GG 43/21.01.2025) a Legislative Drafting Committee was established at the Ministry of Justice, which consists of judges, university law professors, lawyers, members of the Expert Group against SLAPP and members of the

Working Group for the Protection of Journalists as well as representatives of other Ministries. The above Committee accepting a relevant request invited to one of its meetings two representatives of journalists' associations (one representative of the Hellenic Radio and Television-ERT- and one representative of the Panhellenic Federation of Journalists' Unions, POESY), who submitted their proposals and opinions on the transposition of the directive into national law.

The draft law being already prepared will not be limited to cross-border cases within the scope of the Directive, but will extend protection to domestic cases as well, in line with the Council of Europe's recommendation on the matter. Furthermore, the members of the above working group are actively participating in EU workshops on the proper transposition of the Directive, as well as in training programs and conferences on SLAPP organized by the Council of Europe.

ii. Monitoring and transparency: Judicial Statistics on media-related cases:

In compliance with the European Commission's **"Anti-SLAPP" Recommendation (EU) 2022/758 of 27 April 2022, the statistics referred to the point 31 of the Recommendation on offences committed through the press, are being processed by the Office for the Collection and Processing of Judicial Statistics of the Ministry of Justice (JustStat).**

A newly installed information system now enables the retrieval of registered decisions and adjudicated compensations amounts for media- related offences.

Based on the statistics **for the year 2025**, the following conclusions can be drawn, consistent with the trends observed in the previous reporting cycles:

- The number of lawsuits against press and media journalist remains low.

- Only a minor proportion of claims are upheld.

- In most cases, awarded amounts are significantly lower than claimed, often under €5,000.

Full court statistics on claims against journalists and media outlets, including amounts claimed and awarded, are provided in the Annex to this contribution.

iii. Financial support for the SLAPPs Observatory of POESY

POESY has established a SLAPPs Observatory in Greece to monitor corresponding incidents, an initiative that was launched within the framework of the Task Force. Through data collection, the Observatory creates a communication channel and is able to provide assistance, in collaboration with the members of POESY, with the aim of contributing to the overall response to the SLAPPs phenomenon. Journalists can report any SLAPPs on the Observatory's platform and receive legal support from POESY. All personal data is treated confidentially for research purposes. Under law **5253/2025 (see article 38), financial support for the SLAPPs Observatory of POESY is provided by the state**, ensuring its sustainability and ability to assist journalists facing abusive litigation. This is the first time that Greek law explicitly provides for direct, recurring public funding for an entity dedicated to monitoring and addressing SLAPPs against journalists, linking funding to compliance with Commission Recommendation (EU) 2022/758.

iv. Media Training Programme of the National School of the Judiciary.

For the 2025–2026 period, the National School of the Judiciary (NSJ) has integrated a comprehensive media training framework into its educational programs. The curriculum focuses on the critical intersection of judicial practice, media relations, and digital communication platforms, equipping judicial officers to navigate complex modern media environments while safeguarding judicial independence and ethical standards. **Key topics include Strategic Lawsuits Against Public Participation (SLAPP), mass media and judicial authority, judicial officers' use of social media, and the interplay between public perception and justice. These subjects are incorporated across initial training, continuous professional development, and specialized programs (please see in Annex NSJ full training programme).**

By embedding these initiatives, the National School of the Judiciary demonstrates a strategic institutional response to the challenges posed by today's media landscape, ensuring that judicial officers at all stages of their careers are prepared to uphold ethical standards, maintain independence, and perform their duties effectively in an increasingly media-driven society.

Other – please specify

1. Media Literacy initiatives – fight against disinformation:

Access to information, freedom of expression and the strengthening of citizens' critical thinking against disinformation are the cornerstones of democracy. In today's era, dominated by an overabundance of information and the rapid spread of the use of artificial intelligence (AI) tools, the need for quality and accurate information becomes imperative.

The Secretariat General for Communication and Media (SGCOMM) has been implementing a coherent framework of initiatives and interventions in recent years, with the aim of addressing disinformation, strengthening citizens' digital literacy and promoting Media Education, especially for the new generation, and submits a report to the European Commission every three years on the actions developed at national level.

The rise of social media and digital platforms has radically changed how news is produced, distributed and consumed. Disinformation on the online space spreads much more rapidly and can be hard to address in a timely manner. For that reason, our focus is on pre-bunking, rather than debunking, and on strengthening societal resilience to disinformation.

A National Strategy for Media Literacy is being established with art. 3992 of Law 5253/2025 with the aim of comprehensively strengthening citizens' information and communication literacy, cultivating critical reception and content production skills, strengthening the public sphere's resilience to misinformation, and upgrading the State's institutional communication. The Strategy has a three-year time frame and is structured around thematic axes, including specific objectives, policy measures, indicative actions, implementing bodies, effectiveness assessment indicators, and an implementation timetable, under the coordination of the General Secretariat for Communication and Information.

This strategy, with institutional characteristics, will be a commitment by the State and the SGCOMM more specifically that includes provisions for annual reporting and coordination. These two initiatives

⁹² The specific provision of interest is **article 39 in Law no. 5253/2025**:

"National Strategy for Media Literacy

1. A National Strategy for Media Literacy (the Strategy) is hereby established, with the aim of comprehensively strengthening citizens' information and communication literacy, cultivating critical perception and content production skills, making the public sphere more resilient to disinformation and upgrading the State's institutional communication.

2. The Strategy constitutes a horizontal public policy framework, is structured into thematic axes, includes specific objectives, policy measures, indicative actions, implementing bodies, effectiveness assessment indicators and an implementation schedule.

3. The Strategy is set for three (3) years.

4. The Secretariat General for Communication and Media is responsible for coordinating the implementation of the Strategy and ensuring synergy with national, European and international policies in the field of Media Literacy.

5. The SGCOMM is responsible for the preparation of periodic monitoring reports of the Strategy, which are published on its website.

6. To support the preparation of the annual report, an Advisory Committee on Media Literacy is established, consisting of experts, representatives of independent authorities, members of the academic community, representatives of non-governmental organizations, journalistic and international bodies. The present committee is established by decision of the Minister to whom the responsibilities of the SGCOMM have been assigned.

7. The SGCOMM, in the context of implementing the Strategy, may conclude memorandums of cooperation with:

- a) public bodies and organizations
- b) educational and research institutions
- c) independent administrative authorities
- d) institutions and organizations of the European Union
- e) representative associations of editors, journalists, publishers and media service providers in general
- f) international organizations and associations
- g) civil society organizations, and
- h) other institutional partners.

8. The memorandums of cooperation of par. 7 concern in particular:

- a) the planning and implementation of educational, training and information actions for citizens of all ages
- b) the production and dissemination of informational, educational or research material
- c) the development of tools for measuring, evaluating and documenting the level of media literacy
- d) the monitoring of disinformation phenomena and disruptions of public debate
- e) the organization of awareness-raising actions, and
- f) the integration and interconnection with relevant European policies."

are closely linked to citizenship as a concept, the education of citizens at the most critical age, the cultivation of critical thinking skills and democratic education, familiarity with the Press and the cross-checking of news and therefore the strengthening of resilience to disinformation. This entire endeavour will be complemented by a new pilot program focusing on media literacy that has been announced by the government.

The Advisory Committee on Media Literacy is to be established in the near future by a relevant Ministerial Decision, in accordance with the provisions of paragraph 6 of the article above.

2. «Cultivating Critical Readers» – A new pilot program on Media Literacy:

The joint pilot program "Cultivating Critical Readers"⁹³ of the Ministry of Education, Religious Affairs and Sports and the Secretariat General for Communication and Media was presented by the Greek government in September 2025.

The goal of the program is to cultivate news literacy, critical thinking and digital responsibility in students aged 12-18, in order to protect younger generations from fake news. To achieve this, news will be connected to subjects such as History, Sociology and Language. At the same time, students will take on the roles of reporters, editors, photographers and content creators. With the "Cultivating Critical Readers" program, tomorrow's citizens will be ready to actively participate in public debate, protect their rights, and build a Democracy resilient to disinformation.

The initiative has begun in October 2025 in over 30 middle and high schools throughout the country (Athens, Thessaloniki, Kastoria, Chania, Patras, Larissa, Heraklion, etc.) for the duration of 12 months. Its implementation will involve training both teachers and journalists who will participate in it.

As part of the program, interactive workshops will be held on topics such as:

- Recognizing and tackling fake news
- Critical use of Artificial Intelligence in information (how to identify errors, misleading prompts and algorithmic distortions)
- Personal data protection and digital security
- Understanding media ethics and the role of journalism

The innovation of the program lies in the fact that for the first time in Greece, a systematic news literacy program will be implemented, combining journalism, artificial intelligence and civic education, which, among other things:

- Offers students practical tools to stand up against information overload, information avoidance, and the dangers of uncritical use of AI.
- Adopts project-based learning with experiential methods (production of podcasts, articles, videos, campaigns).
- Promotes the reading and analysis of the printed and digital press, enhancing the readability and sustainability of the press.

3. Conferences on Media Literacy/Disinformation:

The SCGOMM carried on with its conferences on media literacy and disinformation. The continued goal is to address the new generation, educators, parents and all active citizens who wish to be informed, to consider basic questions on media and become familiar with the concept and the functions of media literacy, so as to be able to benefit from all the advantages and recognize the disadvantages of the digital world. Another conference took place in Kastoria (16.05.2025)⁹⁴.

Some of the themes covered:

- i. Literacy in the age of AI
- ii. Fake news and disinformation in the era of social media
- iii. The influence of social media and psychological consequences for teenagers

The conference included participation of scientific experts, academics, psychologists, journalists, cybersecurity experts and other professionals. Prior to the conference, a hands-on workshop took place, where students had the opportunity to consider the impact of the media, obtain a more critical

⁹³ <https://media.gov.gr/parousiasi-pilotikou-programmatos-kalliergontas-kritikous-anagnostes/>

⁹⁴ <https://media.gov.gr/imerida-i-paideia-sta-mesa-kastoria-16-05-2025/>

perspective on media and information and be informed about helpful tools to confront disinformation and fake news. During the workshop, the specially designed leaflet on disinformation, created by the SGCOMM, is distributed to the students.

4. MedDMO Workshop:

In November 2025, a workshop was held for SGCOMM staff by MedDMO on combatting disinformation. Areas covered included characteristic elements of disinformation and possible ways to combat it; tools and policies for dealing with it; the vision of EDMO: its mission, activities in Cyprus, Greece and Malta, its role as a hub and its key actions and next steps. This collaboration, which began in 2025, is set to expand in the coming months, through the signing of a Memorandum of Understanding with the organization.

5. Participation in the Council of Europe's "RESIST" project to strengthen resilience to disinformation:

The SGCOMM participates as a partner in the Council of Europe's "RESIST: Reinforcing Societal Resilience to Disinformation in Europe" project with an implementation horizon of 2025-2030. The project focuses on issues of Democracy, the Rule of Law and Human Rights, and aims to:

- Highlight the causes and mechanisms that lead individuals to believe, share and/or produce disinformation content
- Develop policy tools that will strengthen societal resilience through education, youth, culture and the media
- Provide clear guidance to policymakers
- Support innovative national strategies for Media Literacy

6. Meeting on "Strengthening Social Resilience against Disinformation":

On the 8th December 2025, the Secretariat General for Communication and Media and the Secretariat General for National Security organised a closed working meeting, with the participation of representatives of 40 domestic government bodies and independent authorities, as well as representatives from the European Commission and the European Parliament, under the topic "Strengthening Social Resilience against Disinformation/Misinformation". After the meeting, SGCOMM sent a questionnaire to all the stakeholders who were invited to the working meeting with the following topics:

A. Mapping existing responsibilities and initiatives

B. Gap Analysis

C. Awareness strategy & future initiatives

Based on the processing of the data to be collected, the operating framework and priorities will be determined and a roadmap of actions will be established that will be supported by future working groups, having in mind the principles of the European Democracy Shield.

7. Memoranda of Cooperation:

The Secretariat General for Communication and Media, in the context of exercising its responsibilities, has proceeded with the signing of Memoranda of Cooperation with University Institutions throughout Greece, intending to commence corresponding collaborations with all Institutions whose action is related to the competences of SGCOMM, in particular for the promotion of media literacy, addressing the phenomenon of disinformation and developing a structured dialogue with the scientific community. A memorandum of cooperation has already been signed with each of the following: Panteion University, Democritus University of Thrace and the University of the Peloponnese.

Furthermore, the SGCOMM has developed an open channel of communication with international and domestic journalistic associations with the aim of discussing and supporting issues related to the issues faced by the sector of journalists and media professionals.

8. Synergy with the Training Institute (INEP) of the National Center for Public Administration (EKDDA):

Consultations with the participation of the Journalists' Union of Athens Daily Newspapers have already been completed and a relevant agreement is expected to be signed for the development of training programs for public servants on issues of identifying misinformation, dealing with Fake news, and good practices for databases of printed and electronic media.

9. Paris Declaration on Multilateral Action for Information Integrity and Independent Media:

The Paris Declaration on Multilateral Action for Information Integrity and Independent Media was adopted by Greece, through the Secretariat General for Communication and Media, in the context of a High-Level International Conference, held in Paris on 29 October 2025 with the participation of a total of 29 countries⁹⁵.

With the Paris Declaration, the 29 governments commit to take collective action to strengthen international cooperation to protect the independence of the press, the integrity of information and the viability of independent media, in an era of increasing polarization, systematic disinformation and the rise of hate speech.

10. Organization of a Forum on Public Discourse in Democracy and the Public Sphere, Digital Security and Information Protection in March 2026 with the participation of representatives of the European Commission and the Council of Europe, representatives of the Press and the public sphere.

11. OSCE RFoM Amb. Jan Braathu's Visit to Greece:

On 22-23 September 2025, the OSCE Representative on Freedom of the Media, Ambassador Jan Braathu, paid an official visit to Greece, the second time he visited the country within the year, after the National Focal Points meeting of the OSCE RFoM "Safety of Journalists Project" (SoJ) that was hosted in Thessaloniki for the year 2025⁹⁶. Ambassador Braathu acknowledged that Greece has made significant strides in enhancing the safety of journalists through a series of capacity-building and training activities, as well as legislative steps, and stated that he looks forward to continued cooperation between Greece and the OSCE in the field of journalist protection⁹⁷. He also stated that the OSCE is ready to provide support to the Greek authorities and is eager to actively engage in the ICSJ's training activities, so that Greece becomes a point of reference in South-Eastern Europe⁹⁸.

The OSCE RFoM Toolbox that was launched within the framework of the SoJ Project, includes five initiatives and good practices from our country, namely: The Collective Labour Agreement for journalists working in public bodies, law 5062/2023 - New system for the selection of administrations of public sector entities, the MoU and Task Force on the SoJ, and the establishment of the International Training Center for Journalists in Thessaloniki⁹⁹.

⁹⁵<https://www.amna.gr/en/article/944738/Greece-signs-Paris-Declaration-on-Multilateral-Action-for-Information-Integrity-and-Independent-Media>

⁹⁶ <https://www.amna.gr/en/article/890769/Jan-Braathu-Greeces-initiatives-in-the-field-of-information-are-very-important--The-establishment-of-the-ICSJ-is-a-huge-achievement>

⁹⁷ <https://www.amna.gr/en/article/935458/Jan-Braathu-to-ANA-MPA-The-government-has-made-substantive-efforts-in-terms-of-press-freedom>

⁹⁸ <https://rfom.osce.org/representative-freedom-media/660937>

⁹⁹ <https://osce-soj.glide.page/dl/b33482>

IV. Other institutional issues related to check and balances

B. The process for preparing, enacting and implementing laws

For the reporting period, the Greek Government following the previous good results in preparing and enacting laws, due to the adoption of Law 4622/2019, preserved the same quality standards and procedures in the law-making process¹⁰⁰. **In a snapshot:**

1. In 2025, for the fourth consecutive year, not a single bill was submitted to Parliament in implementation of either the urgent or super-urgent procedure, which was standard practice in previous years.
2. The number of amendments per draft bill has declined to a new historic low of 0.56 amendments per draft bill, underscoring the sustained strengthening of legislative discipline and regulatory quality.
3. In parallel, the number of provisions per amendment following a consistent downward trend has declined further to 2.34 provisions per amendment, representing the lowest level recorded to date.
4. In accordance with Article 44 § 1 of the Constitution, and due to extremely urgent and unforeseen events relating to the outbreak of sheep and goat pox, one act of legislative content [πράξη νομοθετικού περιεχομένου] was issued in the context of emergency legislation.
5. Since 2023, not a single last-minute amendment was submitted by the Government to Parliament.
6. As in 2024, in 2025 not a single bill was submitted to Parliament without previous public consultation.
7. For the second consecutive year, as in 2024, every draft bill was submitted to the two-week rule of public consultation before its enactment.
8. In a significant novelty, apart from public consultation, since 2025, all draft bills are submitted to the Economic and Social Council for prior consultation.
9. As in 2024, the Central Codification Committee continued its intensive work on codification of legislation.
10. Preparatory work is underway for the revision of the legislative drafting manuals, while the National Codification Portal remains a strategic priority.

More specifically:

¹⁰⁰ As already noted in our previous contributions (RoL 2024, RoL 2025), according to the Law 4622/2019, each draft bill is first presented to the Council of Ministers before being submitted to the General Secretariat for Legal and Parliamentary Affairs, which is responsible for coordinating all ministries, within their respective areas of competence, in relation to the legal acts concerned. The General Secretariat carries out an initial assessment of the legal drafting for consistency with constitutional, European, and international law, as well as an evaluation of the completeness and effectiveness of the acts concerned. Every draft bill is accompanied by the Impact Assessment Analysis, which contains an explanatory memorandum (αιτιολογική έκθεση), its impact report (έκθεση συνεπειών) and the General Accounting Office's reports on fiscal implications, a report on the bill's public consultation, a legality report (examining the bill's consistency with constitutional, European and international law) and an implementation report (outlining the steps that need to be undertaken to ensure the bill's implementation, e.g. the necessary secondary legislation). Moreover, since 2019, key legislative drafting features that enhance the clarity, accessibility and effectiveness of legislation have been consistently applied, including a table of contents preceding each bill; substantive headings in each article; a concise explanation introducing each amendment of existing legislation; and the compilation of all delegation clauses and transitional provisions in distinct articles. Additionally, every draft bill is afterwards subject to public consultation for a minimum of two weeks. During the same period of time, the draft bill is also submitted to the Economic and Social Council for consideration on the basis of monitoring legislation from the civil society point of view and it is also assessed by a high-level interdisciplinary body, the Committee on Quality Evaluation of the Law-making Process, comprising both legal and economic experts, who assess the quality of draft legislation, submit their proposals and contribute to the law-making process, before the draft bill is finally submitted to Parliament. Apart from the Committee on Quality Evaluation of the Law-making Process, the Central Codification Committee is responsible for the codification of legislation.

1. Framework, policy and use of impact assessments and evidence-based policy-making, stakeholders'/public consultations (including rules and practices on the transparent participation of civil society to policy development and decision-making processes, and transparency and quality of the legislative process in the preparatory, the parliamentary and implementation phase (including guidance on how to implement legislation).

a. Public consultation:

As already mentioned in our input on RoL 2025, draft bills are consistently subject to public consultation for a minimum of two weeks. **Within 2025**, just like in 2024, not a single bill has been submitted to Parliament, without previous public consultation as required by the law 4622/2019. As far as the duration of public consultation is concerned, following the publication of the European Commission's previous rule of law report, all draft bills complied with the two-week rule for public consultation. In this context, 66% of draft bills (31 out of 47) were subject to public consultation for two weeks.

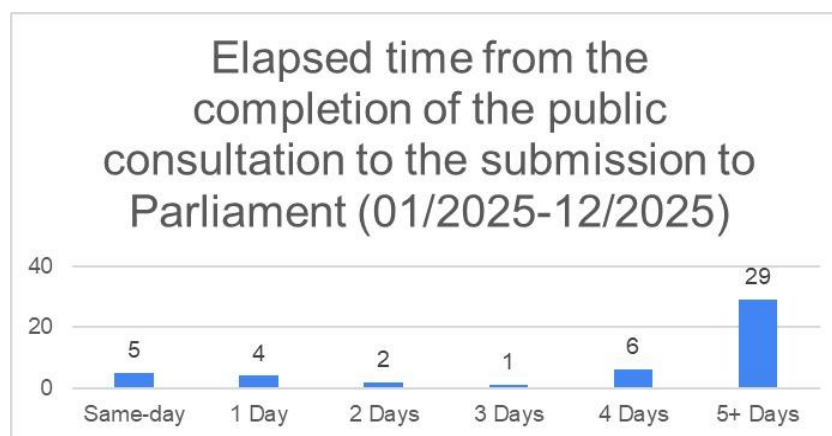
Additionally, draft bills of fundamental importance are subject to public consultation for additional time; 34% of draft bills (16 out of 47) were subject to public consultation for more than fifteen days. For instance, the bill on «Fair Work for All: Simplification of Legislation – Support for the Worker – Protection in Practice» which was open to public consultation for 26 days and the bill on «Establishing criminal offences and sanctions against natural and legal persons for breaching the restrictive measures of the European Union, implementing Directive (EU) 2024/1226 of the European Parliament and of the Council of 24 April 2024 on the definition of criminal offences and penalties for the violation of Union restrictive measures and amending Directive (EU) 2018/1673 and other provisions» which was open to public consultation for 19 days.

STATISTICS ON DRAFT BILLS SUBMITTED TO PUBLIC CONSULTATION				
YEAR	IN CONSULTATION 14-15 DAYS	IN CONSULTATION FOR LESS THAN 14 DAYS	IN CONSULTATION FOR MORE THAN 15 DAYS	TOTAL NUMBER OF DRAFT BILLS IN CONSULTATION
2018	8	22	14	44
2019	5	11	6	22
	5	19	2	26
2020	32	9	10	51
2021	40	4	6	50
2022	43	12	5	60
2023*	8	13	0	45
	17	4	3	
2024	39	8	1	48
2025	31	0	16	47
TOTAL	228	102	63	393

Another element that proves the continuous improvement in preparing and enacting laws, is the increase of indicators relating to the percentage of articles opened to public consultation as part of the published draft in relation to the total articles submitted to parliament.

On the same basis, as in 2024, where the percentage of articles opened to public consultation compared to those submitted to the parliament reached 91.4% of all articles, in 2025, the percentage has risen to 93.4% and the percentage in relation to the total articles published, which also includes articles in amendments, has risen from 82.5% in 2024 to 88% in 2025.

Finally, since January 2025, the average time that elapses between the completion of the public consultation and submission to Parliament is constantly increasing, with 80.8% of the draft bills (38 out of 47) being submitted at least two days and 74.5% (35 out of 47) at least four days, after the completion of the public consultation, as shown in the table below:



This represents an increase of 15.4% in 2025 compared to 2024 (from 70% to 80.8%) with regard to draft bills submitted at least 2 days after the conclusion of the consultation period, and an increase of 14.6% (from 65% to 74.5%) for draft bills submitted at least 4 days after the consultation period.

b. Participation of stakeholders and the civil society in the law-making process:

In addition to public consultation, in implementation of the findings included in the 2024 European Commission's 2024 Rule of Law country report for Greece, draft bills are submitted to **the Economic and Social Council (Οικονομική και Κοινωνική Επιτροπή - ΟΚΕ)** for consultation, in order to strengthen the participation of civil society in law-making. The Economic and Social Council is a consultative body, organized in the example of the European Economic and Social Committee, functioning as an independent legal entity, founded by Law 2232/1994 and is also constitutionally protected through Article 82 of the Constitution since 2001. Once the report of the Economic and Social Council is submitted to the General Secretariat for Legal and Parliamentary Affairs, it is duly taken into account by both the competent ministry and the General Secretariat prior to the finalisation of the draft bill. The report is incorporated into the Impact Assessment Analysis accompanying each draft bill and is made publicly available on the Parliament's website, together with all supporting documents submitted alongside the draft bill.

In addition, draft bills are submitted to the various independent authorities, according to their competence. According to the Parliament's Rules of Procedure, stakeholders (including civil society organizations) and experts (including independent authorities) are consistently invited to express their opinions regarding bill drafts, before the bill is discussed in the plenary, thus allowing their views to be taken into consideration from members of parliament when voting for bills.

c. Codification of legislation:

In accordance with Article 76 § 6 (101) of the Constitution, in 2025 the following legislation was codified:

- **Code of Indirect Taxes on Transactions within the Scope of Application of the Tax Procedure Code, as well as Other Indirect Taxes (Law 5177/2025) and**
- **Property Tax Code (Law 5219/2025).**

Moreover, in 2025, the following two codes were adopted:

¹⁰¹ Article 76 para 6: "Judicial or administrative codes drafted by special committees established under special statutes may be voted through in the Plenum of the Parliament by a special statute ratifying the code as a whole."

- **Code for Traffic Regulation (Law 5209/2025) and**
- **National Customs Code (Law 5222/2025).**

Pursuant to Article 76 § 6 of the Constitution and Article 111 § 3 (102) of the Parliament's Rules of Procedure, a simplified parliamentary process applies exclusively to the codification of existing legislation without substantive amendments. Within this framework, and pursuant to Law 4622/2019, the Central Codification Committee is entrusted with the examination of draft codes, in order to verify that they constitute a systematic consolidation of existing provisions and comply with the principles governing codification.

This simplified process was not followed in respect of the **Code for Traffic Regulation (Law 5209/2025) and the National Customs Code (Law 5222/2025)**, as these Codes do not merely codify existing law, but also introduce substantive changes to the legal framework, adapting the regulatory regime to current needs. For this reason, they were adopted through the ordinary legislative procedure.

In addition, in a development of fundamental importance, **all labour law** has been codified in a single document produced by the Central Codification Committee (**Presidential Decree 62/2025**).

In this context of ongoing efforts to promote the systematic codification of legislation, at least two new codes of particular significance are expected to be submitted to Parliament for adoption in 2026: the **Consumer Protection Code and the Spatial and Urban Planning Code**.

d. Accessibility, drafting practices and digital tools:

Building on the good drafting practices already implemented, the General Secretariat for Legal and Parliamentary Affairs plans to revise the Legislative Drafting Methodology Manual and the Regulatory Impact Assessment Manual in 2026. The revision will focus on further enhancing the accessibility, simplicity and clarity of legislative language, promoting a more consistent and user-oriented presentation of legal provisions, and supporting the uniform application of drafting and impact assessment standards across all ministries.

Regarding the state of play of the National Codification Portal, as already reported in previous contributions, the Legal Provisions Processor, a modern legal informatics tool supporting the drafting of primary and secondary legislation, has been implemented.

As regards the public legal database component of the Portal, its development has proven to be technically complex, due to the scale and fragmentation of the legislative corpus and the need to ensure accuracy, reliability and continuous updating of codified texts. In this context, the implementation of the Portal is being reassessed in order to address the identified technical challenges and to ensure that its deployment is consistent with the required standards of quality and legal certainty. Work on the project is ongoing.

e. The Legislative Quality Index 2024 (103)

2024 is the best year of the decade according to the KEFIM Legislation Quality Index

The quality of legislation improved significantly in 2024, recording its best performance of the decade according to the Legislation Quality Index published for the sixth year by the Center for Liberal Studies, which examines the laws passed during the 2024 calendar year.

According to the report's findings, in 2024 the quality of legislation was rated at 64.8 points, an improvement of 4.3 points compared to 2023. Compared to 2019, the improvement reaches +6.1 points, while compared to 2014, it reaches +8.6 points, confirming a clear long-term upward trend in the quality of legislation.

A key positive factor for 2024 is the consolidation of the reduction in the volume of legislation, despite a marginal increase in the total number of pages.

¹⁰² Article 111 para 3: "In the adoption of judicial or administrative codes and in the codification of provisions carried out in accordance with Article 76 paragraphs 6 and 7 of the Constitution, the debate is held once in principle, followed by a vote on the code as a whole."

¹⁰³ <https://kefim.org/deiktis-poiotitas-nomothetisis-simantiki-veltiosi-stin-poiotita-tou-nomothetikou-ergou-to-2024-me-epimones-ostoso-diarthrotikes-ekkremitites/>

Compared to 2023:

The number of laws passed decreased by 6.1%,

articles by 28.2%,

amendments by 24.3%,

authorizations for Presidential Decrees by 44.4%, and

authorizations for Ministerial Decisions by 29.8%.

Compared to 2014, 2024 shows approximately 80% fewer amendments and 78% fewer authorizations for Presidential Decrees, reducing institutional overload and improving the conditions for monitoring and enforcing laws.

Improvement of the parliamentary process

The parliamentary process shows a clear improvement (+3.5 points), with all laws being voted on through the normal procedure (i.e., not as urgent). The average number of amendments per law has fallen to a historic low of 1.22.

f. The transposition of EU directives into national law.

According to the comparative data on the progress of transposing directives by year and by country published on the website <https://ec.europa.eu/implementing-eu-law/transposition-directives/en#inline-nav-4>, in June 2019 Greece was ranked third worst in terms of transposing EU directives, whereas today it is ranked 10th best.

2. Rules and use of fast-track procedures and emergency procedures (for example, the percentage of decisions adopted through emergency/urgent procedure compared to the total number of adopted decisions)

a. Urgent and super-urgent legislative procedures:

Since 2019, the use of urgent and super-urgent legislative procedures, which allow for limited parliamentary debate, has been progressively reduced. During the 2015–2019 legislative period, an annual average of 7.11 bills were adopted under the urgent procedure and 4.22 under the super-urgent procedure. By contrast, since July 2019 only three bills have been adopted under the urgent procedure, with a single case in 2021 and none in 2022, 2023, 2024 and 2025, while the total number of super-urgent bills over the same period amounts to eight, including only one in 2021 and none since 2022. As a result, in 2025, for the fourth consecutive year, no bill has been submitted to Parliament under either the urgent or the super-urgent procedure.

b. Parliamentary amendments:

In 2025, the number of amendments reached a historic low of 0.56 amendments per draft bill, a trend that is also confirmed by recently published findings from civil society organisations on the quality of legal drafting, indicating that the total number of parliamentary amendments declined by around 80% between 2014 and 2024 (104).

Similarly, the number of provisions per amendment is constantly decreasing, currently reaching a historic low of 2.34.

According to previous surveys:

In 2021, the average number of provisions per amendment was 5.64;

In 2022 the average number of provisions per amendment was 5.96;

In 2023, from January to April, (parliamentary period before elections) the average number of provisions per amendment was 7, and from July to December, (parliamentary period after elections) the average number of provisions per amendment was 4.23;

In 2024 the average number of provisions per amendment was 3.74.

¹⁰⁴https://kefim.org/deiktis-poiotitas-nomothetis-simantiki-veltiosi-stin-poiotita-tou-nomothetikou-ergou-to-2024-me-epimones-ostoso-diathrotikes-ekremotites/?fbclid=IwY2xjawO_gvJleHRuA2FlbQIxMABicmlkETFac0VUelFVOHZXOWxMOW5hc3J0YwZhcHBfaWQQMjlyMDM5MTc4ODIwMDg5MgABHtPQmwnrImQTbP71zrQw9JNW3ltEX6n3tocoJ5234OHO-wWTHku6TikuEOb_aem_MwUuXTw3M6YHLxwsPzUv8g

c. Last-minute amendments:

Since 2023, not a single last-minute amendment has been submitted by the Government to Parliament, thus marking a clear departure from past practices whereby amendments were introduced during the discussion of a draft bill in the Parliament's plenary session, hours or literally minutes, before its completion. Such amendments are no longer submitted, reflecting the current Government's commitment to transparency and accountability in the preparation and enactment of laws.

3. Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.

a. Legal certainty and stability

It should be reminded that Good legislation in Greece is grounded in the constitutional principles of legal certainty and transparency, supported by mandatory reports and procedural safeguards during the drafting and parliamentary stages. Key laws, such as Law 4622/2019, and the Manual of Legislative Drafting Methodology provide structured rules to ensure clarity, predictability, and public accountability. Specific constitutional provisions restrict retroactive legislation, especially in criminal and tax matters. The Council of State has reinforced these principles by requiring clear, reasonable, and legally defined limitation periods, particularly for tax obligations.

For more detailed information, please see our answer on A5. Additional Questionnaire of the RoL2025 Questionnaire: Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.

b. Additionally on the non-discrimination factor:

Greek legislation on the elimination of discrimination and the promotion of equal treatment is based on a combination of constitutional provisions, European directives and specific laws. The most important provisions focus on prohibiting discrimination on the grounds of sex, race, color, ethnic origin, ancestry, religious/other beliefs, disability, age, sexual orientation, and gender identity, namely:

i. The Greek Constitution enshrines the prohibition of discrimination through a number of fundamental provisions that guarantee equality and the protection of human dignity:

Article 4 (General Principle of Equality): This article stipulates that all Greeks are equal before the law. In particular, paragraph 2 enshrines gender equality, stating that men and women have equal rights and obligations.

Article 5 (Protection of Personality): Paragraph 2 explicitly states that all persons within Greek territory enjoy absolute protection of their life, honor, and freedom, without discrimination based on nationality, race, language, or religious or political beliefs.

Article 13 (Freedom of Religion): Ensures that the enjoyment of individual and civil rights does not depend on anyone's religious beliefs.

Article 22 (Right to Work): Establishes the principle of equal pay for work of equal value, regardless of gender or other discrimination.

Article 116 (Positive Measures): Allows the State to take positive measures to promote equality between men and women, specifying that these do not constitute prohibited discrimination.

ii. The relevant legislation

1. Law 4443/2016 (GG A' 232) is the main law for the transposition of European Directives (2000/43/EC and 2000/78/EC) promoting the principle of equal treatment. It prohibits discrimination in work, employment, vocational training, and (with amendments) in social areas such as social protection, education, and access to goods/services.

Amendment in 2024: Article 9 of Law 4443/2016 was amended by article 70 of Law 5089/2024 to extend the prohibition of discrimination based on sexual orientation, gender identity, expression, and characteristics, as well as religious or other beliefs, to areas of national competence, i.e. beyond the scope of European Union Directive 2000/78 and covering areas already covered by previous laws. Specifically, under the new regulation, discrimination based on the above-mentioned characteristics of

a person will no longer be permitted in the 25 areas of (a) social protection, including social security and healthcare, (b) social benefits and tax concessions or advantages, (c) education, and (d) access to the supply and provision of goods and services available (for consideration) to the public, including housing.

2. Article 70 of Law 4488/2016 (GG A 137):

This article introduces reforms that play an important role in the overall change and improvement of the treatment of persons with disabilities in our country, establishing critical tools for the production of policies concerning these individuals. The first two paragraphs establish a horizontal obligation for the bodies involved in the legislative process to consider the rights of persons with disabilities when drafting legislative provisions and to consult with these persons, their representative organizations, and individuals or groups of individuals who have a legitimate interest in the rights of persons with disabilities. It also establishes an obligation for those involved in the drafting of legislative provisions to cooperate with the bodies that make up the mechanism for monitoring the implementation of the UN Convention on the Rights of Persons with Disabilities, namely the Coordinating Mechanism (Minister of State responsible for the coherence of government work) of Article 71 of the above law and the Central Reference Point (General Secretariat for Transparency and Human Rights) of Article 72 of the same law. Equally important, the second paragraph provides for an amendment to the legislation on good lawmaking and the addition to the regulatory impact assessment of a specific section concerning the documentation of the compatibility of the proposed regulations with the Convention, as well as the specific consequences for persons with disabilities with disabilities resulting from the proposed regulations. The third paragraph addresses the lack of statistical data, which is a key tool for the design and formulation of public policies by requiring the Hellenic Statistical Authority and the services and bodies belonging to the Hellenic Statistical System to develop, produce, and disseminate official statistics on persons with disabilities.

3. Law 4808/2021 (GG A' 101): Ratifies Convention 190 of the International Labor Organization (ILO) on the elimination of violence and harassment, including gender-based violence, in the world of work. Imposes policies and Employer Obligations to prevent and address discrimination, violence, and harassment, especially for persons with disabilities.

4. Law 5089/2024 (GG A' 27/16.02.2024): Legalizes same-sex marriage and strengthens protections against discrimination. It makes Greece the 16th EU country to fully recognize same-sex marriage. An important step towards eliminating discrimination based on sexual orientation.

4. Rules and application of states of emergency (or analogous regimes), including judicial review and parliamentary oversight.

Emergency legislation:

Emergency legislation that is adopted by the Government and subsequently ratified by the Parliament ("acts of legislative content" [πράξεις νομοθετικού περιεχομένου]) is provided in Article 44 of the Greek Constitution under strict conditions.¹⁰⁵ During 2023, four such acts were enacted in full compliance with the constitutional requirements. The two first acts (in June and July 2023) aimed at addressing urgent public health needs as the Parliament was not in session; the third act (in September 2023) addressed the emergency situation caused in the Thessalia region by the "Daniel" storm; finally, the fourth act (in December 2023), against the backdrop of a number of serious incidents associated with endemic fan violence, provided for all Super League I football matches to be held behind closed doors for two months so as to ensure full compliance with the legal requirements regarding safety in sports venues and protection of life and bodily integrity of all participants. For the first time since 2017, in 2024, not a single act of emergency legislation was adopted.

¹⁰⁵ Article 44 para 1: "Under extraordinary circumstances of an urgent and unforeseeable need, the President of the Republic may, upon the proposal of the Cabinet, issue acts of legislative content. Such acts shall be submitted to Parliament for ratification, as specified in the provisions of article 72 paragraph 1, within forty days of their issuance or within forty days from the convocation of a parliamentary session. Should such acts not be submitted to Parliament within the above time-limits or if they should not be ratified by Parliament within three months of their submission, they will henceforth cease to be in force."

5. Regime for constitutional review of laws

With reference to our contributions in RoL 2024 and 2025 on the above subject, we summarise the following:

a. The diffuse nature of constitutional review of laws

In Greece there is no Constitutional Court. The Greek Constitution guarantees the constitutionality review (art. 93 par. 4 (106) and 87 par. 2(107)). Control over the law's constitutionality has a diffuse nature, it can be carried out by any court. According to these provisions, every court has the right and the duty to examine the constitutionality of the law and safeguard the application of the Constitution in each concrete case pending before it.

b. The Court of art. 100 of the Constitution

In cases of conflict between the Highest Courts concerning the constitutionality of the law, a special court, the "Supreme Special Court", is competent to solve such dispute/disagreement about the constitutionality of the law. According to Article 100 (108) of the Greek Constitution, this court is composed by judges of all three Highest Courts and its decisions are binding for all other courts.

c. The "pilot" case process

Law 3900/2010 (Art. 1) introduced the institution of the "pilot case process" before the Council of State, enabling litigants and administrative courts to directly address the Council of State cases with issues of a more general interest that fall within the competence of the Administrative Courts of First Instance or Administrative Courts of Appeal, under the condition that such case has not already been discussed before the administrative court. In 2025, 24 petitions were filled by litigants for cases to be heard under the "pilot case process" [7 of those petitions were found admissible and will be heard before the Council of State] and 16 Judgments were issued under the "pilot case process" (see Judgments No. 2321/2025, 2320/2025, 2251/2025, 2233/2025, 2131/2025, 2105/2025, 1576/2025, 1155/2025, 1150/2025, 890/2025, 808/2025, 532/2025, 483/2025, 334/2025, 223/2025, 49/2025).

d. The advisory function of the Council of State

According to article 95 par. 1 of the Constitution, the Council of State gives an opinion to the Administration on the legality of the draft regulatory presidential decrees. Up until 2025, Chamber E of the Court was solely competent to give opinions on the legality of said presidential decrees. However, in view of the fact that the submission of a very large number of draft regulatory urban-planning decrees for review by the Court is expected, and the processing of all draft presidential decrees must be carried out swiftly, by decision 19/2025 the Administrative Plenary of the Council of State decided that from 16.9.2025 Chamber C will also be competent to give opinions on the legality of certain presidential decrees.

¹⁰⁶ Article 93 par. 4. The courts shall be bound not to apply a statute whose content is contrary to the Constitution
¹⁰⁷ Article 87 "1. Justice shall be administered by courts composed of regular judges who shall enjoy functional and personal independence. 2. In the discharge of their duties, judges shall be subject only to the Constitution and the laws; in no case whatsoever shall they be obliged to comply with provisions enacted in violation of the Constitution.

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¹⁰⁸ **Article 100** 1. A Special Highest Court shall be established, the jurisdiction of which shall comprise: ... e) Settlement of controversies on whether the content of a statute enacted by Parliament is contrary to the Constitution, or on the interpretation of provisions of such statute when conflicting judgments have been pronounced by the Supreme Administrative Court, the Supreme Civil and Criminal Court or the Court of Audit. 2. The Court specified in paragraph 1 shall be composed of the President of the Supreme Administrative Court, the President of the Supreme Civil and Criminal Court and the President of the Court of Audit, four Councilors of the Supreme Administrative Court and four members of the Supreme Civil and Criminal Court chosen by lot for a two-year term. The Court shall be presided over by the President of the Supreme Administrative Court or the President of the Supreme Civil and Criminal Court, according to seniority. In the cases specified under sections (d) and (e) of the preceding paragraph, the composition of the Court shall be expanded to include two law professors of the law schools of the country's universities, chosen by lot

B. Independent authorities

1. Independence, resources, capacity and powers (including effective access to relevant data) of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions

a. With reference to our contribution on RoL2024 & 2025, the following should be reminded:

The protective institutional framework of Independent Authorities (IAs) in Greece, based on Article 101A of the Constitution, guarantees the functional and personal independence of their members from governmental hierarchy, imposing enhanced parliamentary majorities for their appointment and safeguarding the duration of their term.

Key Pillars of Protection

-Constitutional Safeguard (Article 101A):

It establishes the requirement that members be appointed with guarantees of personal and functional independence, selected through the Conference of Presidents of the Hellenic Parliament.

-Term of Office and Renewal:

Members serve a fixed term, while an explicit provision allows the extension of their mandate until new members are appointed, ensuring continuity in their operation. Previously identified challenges regarding the appointment of members of Independent still remain due to the fact that no consensus has been reached by the competent Conference of Presidents of Parliament according to the Constitutional Provisions for three Independent Authorities¹⁰⁹ (HDPa, ADAE, Ombudsman).

-Incompatibilities:

Strict incompatibilities apply to members during their term of office in order to avoid conflicts of interest.

-Functional Autonomy:

Independent Authorities operate outside the traditional administrative hierarchy, ensuring objectivity in sensitive areas.

It should be noted, that following a proposal of HDPa, Article 154 of Law 5221/2025, GG A`133/28.07.2025 was legislated, which provides for the competence of the above Authority to amend its organigram by its own decision (instead of a Presidential Decree). Further proposals of the above IA on the context of legal improvements and simplification are under examination from the Ministry of Justice.

-Human resources:

The challenges regarding the human resources are addressed by an act of the Cabinet of Ministers¹¹⁰ according to which new staff positions were approved (i.e. 20 new positions for the HDPa). For further information please see the relevant Table on the positions provided for IAs under Pillar II.

In addition to the above, regarding the issues of the Independent Authorities and the requests/proposals proposed by them for their more effective operation, we remind the assignment of a study on improving the functioning of the independent authorities at the OECD in cooperation with the General Directorate for Structural Reforms (DG Reform) of the European Union (EU). Please, see the relevant answer on the following question.

2. Safeguards to ensure the effective independence of supervisory and regulatory authorities with a direct impact on economic operators such as national economic oversight, enforcement and competition authorities.

The assignment of a study on improving the functioning of the independent authorities at the OECD in cooperation with the General Directorate for Structural Reforms (DG Reform) of the European Union (EU)

¹⁰⁹ See <https://www.hellenicparliament.gr/Enimerosi/Deltia-Typou/?press=926876f9-b191-4dce-9898-b37700f76c00>

¹¹⁰ Act 29/27.10.2025 - 2026 recruitment planning approval

Furthermore, in order to improve the framework of the independent authorities, the Greek government, following an initiative of the Minister of State in cooperation with the General Secretariat for the Coordination of Government, assigned in September 2024 the study on improving the functioning of the independent authorities at the OECD in cooperation with the General Directorate for Structural Reforms (DG Reform) of the European Union (EU). The project is funded by the Technical Support Instrument (TSI). Already during the first months of the project's implementation a series of meetings of OECD representatives with ministries and independent authorities took place.

C. Accessibility and judicial review of administrative decisions

1. Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data) and respect of the good administration principle (including the obligation of the administration to give reasons for decisions)

Please see our answer on the following topics of our input on RoL 2025:

C1. Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data) page **Error! Bookmark not defined.**

C5. Additional Questionnaire of RoL2025 - Respect of the good administration principle (including the obligation of the administration to give reasons for decisions) [this question complements the existing question on transparency of administrative decisions] page 130

2. Judicial review of administrative decisions: short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or derogations from the general regime of judicial review)

Please see our answer on the following topic of our input on RoL 2025

C2. Judicial review of administrative decisions: short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or derogations from the general regime of judicial review)

3. Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies (e.g. administrative review)

Please see our answer on the following topic of our input on RoL 2025

C6. Additional Questionnaire - Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies. [this question complements the existing question on judicial review of administrative decisions] page **Error! Bookmark not defined.**

4. Rules and practices related to the application by all courts, including constitutional jurisdictions, of the preliminary ruling procedure (Art. 267 TFEU)

a. Request for a preliminary ruling to the CJEU:

In 2025, there were thirteen (13) cases of preliminary references sent by national courts before the Court of Justice of the European Union. They were all lodged by administrative courts, namely by:

i. The Council of State

In 2025, the Council of State lodged eleven (11) requests for a preliminary ruling to the CJEU (see Judgments 2260-2261/2025, 2193/2025, 1726/2025, 1479/2025, 1096/2025, 1076/2025, 920/2025, 868/2025, 275/2025, 168/2025), in relation to the interpretation of provisions of EU Regulations and Directives. Most requests concern cases falling within the field of economic law (e.g. public procurement procedures, energy law, banking law, state aid legislation), environmental law, tax law and international protection (see cases C-149/25 on air transport, C-255/25 on State aid, C-359/25 concerning Directive

2000/78 and retirement ages, C-397/25 on social security, C-478/25 concerning Directive 2019/883 on port reception facilities for the delivery of waste from ships, C-584/25 on public procurement and C-618/25 on public procurement)

ii. the Administrative Court of First Instance of Thessaloniki lodged one (1) request for a preliminary ruling to the CJEU (T-356/25 on VAT)

iii. the Special Court for Actions against Judges lodged one (1) request for a preliminary ruling to the CJEU (C-686/25 on the personal liability of a European Delegated Prosecutor)."

b. Important case law concerning the rule of law:

The Council of State, through its Judgments, confirms its role in safeguarding the rule of law. For example, in 2025 the Court issued the following Judgments:

i. **Judgments 1918-1920/2025 (in Plenary Session)** where the Court held that the establishment and operation of branches of foreign universities originating from the European Union or from a country that is a party to the GATS, under a law, which ensures a high level of studies and academic freedom, is not prohibited by the Constitution, as the latter should be interpreted in harmony with EU law, in view of recent legislative and case-law developments of EU law.

ii. **Judgment 1048/2025 (in Plenary Session)** where the Court annulled a ministerial decision declaring Turkey as a safe third country for applicants for international protection from Syria, Afghanistan, Pakistan, Bangladesh, and Somalia due to a lack of sufficient reasoning for said declaration, following judgment of the CJEU of the 4.10.2024 (case c-134/23). It should be noted that, following this annulment, a ministerial decision declared again Turkey as a safe third country. The case was heard before the Plenary Session in November 2025, and the judgment is pending.

iii. **Judgment 869/2025 (in Plenary Session)** where the Court held that the statutory provisions that give to tax administration the power to suspend the use of or deactivate a taxpayer's tax identification number (TIN), when there are objective indications that the taxpayer is committing tax evasion, without laying down the basic regulations and the appropriate safeguards, as the principle of rule of law requires in such a case, are contrary to the Constitution.

iv. **Judgments 657/2025, 659/2025 and 660/2025 (in Plenary Session)** where the Court held that the fines imposed on three political figures for the leak of personal data of voters abroad, through mass e-mails, prior to the European elections 2024, were lawful, as this leakage violated the legislation on the protection of personal data (GDPR).

5. Implementation of final judgments by the public administration and State institutions and follow-up given to supranational judgments, including decisions from the European Court of Human Rights, as well as available remedies in case of non-implementation

a. Compliance of the Administration with court decisions –Legal framework

The Greek Constitution provides for the obligation of the Public Administration to comply with final judgments (article 95 par. 5). Law 3068/2002 establishes a mechanism to ensure the Administration's compliance with judgments and their implementation.

In 2025, the Council of State (in Council) issued 47 decisions regarding the Public Administration's compliance to the Court's Judgments.

i. Working Group on the reform of the relevant legislative framework

The current Law 3068/2002 (A' 274), which was enacted in accordance with Article 95(5) of the Constitution, established a special procedure for the Administration's compliance with court decisions. Today, more than two decades after the enactment of Law 3068/2002, it is considered necessary to reform the legislative framework with a view to creating an effective legal remedy for compliance and simplifying and shortening the procedure, in accordance with the requirements of the case law of the ECHR.

A working group has already been set up at the Ministry of Justice to reform the legislative framework of Law 3068/2002 (GG YODD 1031/25.08.2025) with a view to creating an effective legal remedy for

compliance, in accordance with the requirements of the case law of the ECHR. The group, headed by a State Councilor, consists of renowned lawyers, judicial officials, and academics specializing in European and administrative law.

The main objective of the group is to create a faster and more effective procedure, with the active participation of representatives of the Administration. In particular, given that most problems of non-compliance or delayed compliance are found within the Administration, the active participation of representatives of the Administration in the proceedings before the compliance councils is considered essential.

Without the meaningful involvement of management, there can be no real compliance. The consistent involvement of management in this process will help its bodies realize their responsibility and will lead to the gradual creation of a willingness on their part to comply quickly with court decisions. Furthermore, this will enable management to advise compliance committees on the best ways to resolve the various legal and technical difficulties that arise in the execution of court decisions.

In addition, the working group is concerned with streamlining and simplifying the compliance process, thereby reducing its duration.

ii. Government Plan to Enforce Court Decisions Through Ministerial Oversight Bodies

Furthermore, the Deputy Prime Minister is working on a legislative initiative aimed at establishing a three-member body in each ministry, reporting directly to the respective minister, which will ensure compliance with court decisions within six months of their issuance, failing which penalties will be imposed.

It follows from the above that the reform of the overall framework for compliance with court decisions is a key choice of the Government, with the aim of creating a flexible and effective framework that will form the basis for the swift administration of justice and will establish a new foundation for the relationship between justice and litigants, as well as the broader relationship between justice and society.

b. Implementation of the European Court of Human Rights judgments

i. The Special Permanent Committee of the Hellenic Parliament for Monitoring ECHR Judgments:

In 2013, the Special Permanent Committee for Monitoring ECHR Judgments was established for the first time in the Standing Order of the Hellenic Parliament, which was a significant initiative in the context of Parliament's role as guardian of the rule of law. Since then, it has been operating continuously and creatively thanks to the members of the House who have served and continue to serve as its members, as well as to its inter-party Presidium.

According to the Standing Order of the Hellenic Parliament (Article 43A para 2), the objective of the above Special Permanent Committee for Monitoring the Decisions of the ECHR is "to monitor and evaluate the implementation of the decisions of the Court and, in particular, compliance with decisions concerning the Hellenic Republic."

Furthermore, according to para 4 of Article 43A of the Standing Order of the Hellenic Parliament, the above Permanent Special Committee consists of the President of the Permanent Committee on Public Administration, Public Order and Justice, as Chairman, the members of the Greek Delegation to the Parliamentary Assembly of the Council of Europe, and is supplemented by members of the Permanent Committee on Public Administration, Public Order and Justice.

For the election of the other members of the Presidium of the said Committee, Articles 34 and 43A para 4 of the Standing Order shall apply, which stipulate, inter alia, that two Vice-Presidents and a Secretary shall be elected by the members of the Committee from the first, second, and third largest opposition parliamentary groups, respectively.

At its meeting on October 3rd, 2024, the above Committee approved by a majority vote its first Report for the First Session of the Twentieth Term of the Parliament, which was submitted to the Plenary Session of the Parliament.

Already, in 2025, the Committee has held three meetings (on January 15, January 23, and February 4), with the following topics: a) Planning the committee's work, b) The use of the EU Charter of Fundamental Rights in the legislative process and in debates before Parliament and c) Contemporary challenges for the state and justice in the light of recent ECHR judgments, accordingly.

ii. Statistical data for the period from 1-1-2025 to 23-12-2025:

1. As of 23-12-2025, a total of 82 judgments were pending before the Committee of Ministers for execution. In 21 of these, supervision of the execution process is carried out under the enhanced supervision procedure¹¹¹, while in 44 cases supervision is carried out under the standard procedure (1 case concerns a friendly settlement), whereas 17 new cases have not yet been classified.
2. From the table below, the following emerge: pending judgments for execution against Greece had been steadily decreasing, with the exception of the year 2025, during which the number of new judgments sent for execution by the European Court of Human Rights increased by approximately 50%. A number of these judgments are connected to migration issues (A.R.E., Alkhatib, Almukhlas).

Year	Number of unexecuted judgments as of 31 December each year	Number of executed judgments	Number of judgments sent for execution
2025	82 (23-12-2025)	30	45
2024	68	31	30
2023	70	35	32
2022	70	48	30
2021	83	57	25
2020	120	111	40
2019	195	84	40

3. During the period from 1-1-2025 to 23-12-2025, the Committee, having found that all necessary and sufficient individual and general compliance measures had been adopted, decided to close the supervision of execution of 30 ECtHR judgments against Greece.

Seven (7) of the above 30 cases were leading cases. These include the execution of the judgment in M.S.S., which had been pending for 14 years, as well as the execution of the judgment in M.A. and Others. During the same period, supervision was also terminated in two additional judgments that had been pending for eight (8) years ("B.A.C." and "Modestou").

Eleven (11) of the above cases concerned the striking out of an equal number of applications from the Court's list following the achievement of friendly settlements.

Twelve cases concerned "repetitive" violations. These included six (6) cases relating to conditions of detention and living conditions of minor asylum seekers.

4. From the above, the following conclusions may be drawn:

The number of judgments whose execution supervision was closed remained approximately at the same level as the previous year (31 in 2024 compared to 30 in 2025). However, the number of judgments delivered by the Court increased significantly compared not only with 2024 but also with the

¹¹¹ 1. a) the "Sidiropoulos and Papakostas" group (ill-treatment by members of the police or the Hellenic Coast Guard), with the "Alkhatib" sub-group (fatal injury in the context of a border protection operation); b) the "Bekir Ousta" group (refusal to register associations in Thrace); c) the "Nisiotis" group (conditions of detention in detention facilities); d) the "A.R." and "H.A." groups (living conditions of adult asylum seekers and irregular migrants and lack of a domestic remedy regarding living conditions); e) "Muhammad" (conditions of detention of adult asylum seekers and irregular migrants); f) the "House of Macedonian Civilisation" case and others (refusal to register an association in Florina); g) the "A.R.E." case (violations of: i) Article 3 and Article 13, in conjunction with Article 3 of the ECHR, due to the return of the applicant to Turkey, ii) Article 5, paras. 1, 2 and 4 of the ECHR, due to the detention of the applicant prior to her return and iii) Article 13 of the ECHR, in conjunction with Articles 2 and 3 of the Convention, due to the lack of effective remedy by which the applicant could present her complaints regarding the alleged danger to her life and the alleged ill-treatment she suffered during the refoulement); and h) the "Micha" case (non-execution of a domestic court judgment ordering the lifting of an expropriation before the entry into force of Law No. 4759/2020 (9-12-2020), and lack of a domestic remedy for the enforcement of that judgment).

immediately preceding years. Consequently, at the present time, and after the closure of supervision of execution of those judgments, a total of seventy-eight (78) judgments remain pending for execution, compared with sixty-eight (68) pending at the end of 2024. This development appears to be linked to the overall change in the Court's working methods, which allows it to deliver an increased number of judgments.

The overall picture of the execution of judgments against Greece appears improved, as in recent years a steady decrease has been observed in cases remaining pending for a period exceeding five (5) years. Nevertheless, in recent years a parallel general trend has been observed of an increase in cases pending under the enhanced supervision procedure, such as A.R.E., Alkhatib (and "Miha". At present, a total of seven (7) leading cases are pending.

Finally, in recent years an increase has also been observed in the complexity of cases, particularly in the broader field of migration.

5. During the above period, a total of EUR 707,648.60 was paid to beneficiary applicants, awarded by the ECtHR as just satisfaction. It is noted that no payment obligation is pending in any case.

6. Furthermore, during the year 2025, dissemination documents were sent in 16 cases, and "Action Plans" and "Action Reports" were submitted in 25 cases.

iii. General measures of compliance with ECtHR judgments

1. The most significant legislative intervention of 2025, connected with the execution of judgments of the ECtHR (the judgments in the group of cases "**Nisiotis v. Greece**") and, in general, with the alignment with the Court's case law, is **the enactment of law 5187/2025**, which was published on March 21, 2025 (GG A. 48). This is an extensive legislative intervention **concerning the structure of the Hellenic Police, the upgrading of its personnel's training and the modernization of the electronic monitoring** of detainees. The said law: a) includes radical changes to the organizational structure of the services to increase operational efficiency, b) provides for the upgrading of the curricula and training infrastructure for the uniformed personnel of the Police, c) modernizes the institution of electronic monitoring for defendants, convicts, and prisoners on leave, enhancing alternative forms of serving sentences, d) introduces regulations for the improvement of living conditions and security within correctional facilities, and e) generally aims to align with the requirements of the ECtHR's case law on the rights of prisoners.

2. In the context of the execution of the judgments in the group of cases "**Nisiotis v. Greece**", Article 120 of **law 5264/2025 (GG A' 239)** added a paragraph to Article 6A of the Penitentiary Code—which established a legal remedy (complaint) regarding conditions of detention in penitentiary institutions and police stations—providing that the ex officio set-off of monetary claims awarded against the Hellenic State by the Sentence Enforcement Court, due to a finding of a violation of prisoners' human dignity on the basis of Article 3 of the European Convention on Human Rights and other rules of domestic and international law on the treatment of prisoners, is not permitted.

3. Law 5218/2025 reforms, among other things, the framework of legal protection in the field of public contracts.

In his explanatory report, the need for a faster resolution of disputes arising in the field of public procurement is highlighted, by preventing protracted pre-trial and judicial appeals in the field of public procurement, issues which often lead to lodging applications with the ECtHR due to violations of the right to a fair trial within a reasonable time (Article 6 § 1 of the ECHR).

4. Following the dissemination of the ECtHR judgment in the application "**O.G. and Others v. Greece**", which concerned a violation of the right to respect for private and family life under the Convention due to: (a) blood sampling carried out without informing or obtaining the consent of the applicants for the detection of the HIV virus, and (b) the publication, pursuant to prosecutorial orders, of photographs and other sensitive personal data of the applicants, the Prosecutor of the Supreme Court of Cassation issued Circular No 1/2025, calling upon prosecutors throughout the country to take into account the findings of the judgment, in order to prevent the ECtHR from finding new similar violations. Similarly, following the dissemination of the judgment of the European Court of Human Rights in the case A.R.E. v. Greece, which concerned, inter alia, a breach of Article 13 of the ECHR, taken in conjunction with Articles 2 and 3 of the Convention, on account of the inadequate criminal investigation of the applicant's relevant complaint, the Prosecutor of the Supreme Court (Areios Pagos) issued document no. 8345a/2025, by

which he called upon prosecutors throughout the country to take into account the findings of the judgment.

5. Implementation in the case of Zouboulidis v. Greece (application no. 57246/21):

(i) Following the ECHR's judgment on the case of Zouboulidis v. Greece (application no. 57246/21), where the Court held that the lack of specific legislation that allows someone to seek compensation against the State for the manifest errors of the judiciary violates article 6 of the Convention, in October 2025 the application of Mr. Zouboulidis to reopen his case, under article 69A of presidential decree 18/1989, was heard before the Plenary Session of the Council of State. The judgment is pending.

(ii) Moreover, as stated above (under Pillar I- Justice), in line with the ECHR ruling, a legislative committee within the Ministry of Justice (GG YOΔΔ 1330/2024) has drafted a bill on the State's civil liability for acts or omissions of judicial bodies. The draft has been submitted to the Ministry and is currently under review, with a view to finalisation in the coming months. It aims to provide fair compensation while preserving judicial independence and the effective functioning of the judiciary.

6. With regard to the execution of the ECtHR judgments in "Safi v. Greece", "Alkhatib v. Greece" and "Almuklas v. Greece", it is noted that, on 20-10-2025, a working meeting was held in Warsaw between the heads of the National Mechanism for the Investigation of Incidents of Arbitrariness (the Greek Ombudsman) and the Fundamental Rights Office of Frontex, with the aim of exploiting the experience of the staff of the National Mechanism in investigating complaints of alleged violations of fundamental rights at the borders. At that meeting, it was decided that the existing cooperation with Frontex's complaints mechanisms and Serious Incident Reports constitutes a priority for their further cooperation.

iv. Legal remedy for raising complaints regarding non-execution of the ECtHR's judgments:

1. Under Article 46 of the ECHR, the execution of the judgments of the ECtHR — namely, the adoption of measures to afford redress to the applicant (individual compliance measures) and to prevent similar violations in the future (general compliance measures) — is supervised by the Committee of Permanent Representatives of the Council of Europe, which is informed by the President of the Legal Council of State of the relevant actions taken by the Greek authorities.

2. In the national legal order there is no legal remedy for raising complaints concerning the non-execution of the ECtHR's judgments. However, as regards the failure to adopt, or the adoption of inappropriate or insufficient, individual compliance measures, applicants may, pursuant to Rule 9.1 of the Rules of the Committee of Ministers, submit their complaints to the Committee by means of relevant communications. As regards the failure to adopt, or the adoption of inappropriate or insufficient, general compliance measures, NGOs, international organisations and official national bodies for the protection of human rights may submit their complaints by means of relevant communications, pursuant to Rule 9.2 of the Rules of the Committee of Ministers.

3. Finally, it is pointed out that, in the event that the ECtHR, by its judgment, finds that a decision of a national court was issued in violation of a right concerning the fairness of the procedure followed or a substantive provision of the Convention and/or its Protocols, in order to fully and effectively execute the judgments of the ECtHR and to rehabilitate the applicants, the Greek legislature has established procedures for repeating the procedure before the courts of all jurisdictions, by whose decision the established violation occurred.

6. Oversight, including by courts, of the use of intrusive surveillance software by national authorities

Please see Greece's Submission to PACE's Committee on Legal Affairs and Human Rights Request for Information, following Council of Europe's Parliamentary Assembly Resolution 2513 and Report of March 2024, which concludes to the following:

The possibilities and malicious uses that arise from the advancements in technology and software development in relations to privacy and data protection constitute a serious challenge for Europe and for all democratic countries. Given the constant and fast-paced technological advances, we must remain vigilant and raise the level of awareness in our societies, as well as cultivate the technological and cybersecurity means to address them. Greece, as many other member states of the Council of Europe,

found herself faced with such challenges in 2022. The existing -at the time- legal framework was not sufficiently positioned to tackle the effects of such intrusive surveillance software and their advance capabilities. Since then, we have taken all the necessary steps at the legislative level to create such a legal ecosystem that would prohibit and deter from the supply for use and trading of surveillance software, as evident with the Laws 5002/2022, 5086/2024 and the strengthening of the Independent Authorities tasked with protecting privacy and data. Greece, also, acknowledged the seriousness of this challenges at the highest political level. Notwithstanding the legitimate, necessary and crucial to national security, role of the intelligence services community, we proceeded with improving and strengthening their framework of operation. What is more, an official Parliamentary Inquiry and all possible administrative proceedings have taken place to fully examine any allegation and do away with any possible suspicion of use of such software in official purposes, underlining the independence and trustworthiness of our Institutions. For all the relevant cases and alleged reports of use of surveillance spyware, criminal proceedings have been initiated, and have been undergoing at the highest level of justice.

Relevant targeted question: Updates regarding the ongoing judicial proceedings into the allegations of the use of spyware and any other relevant development, including the adoption of the presidential decree foreseen in Article 13 of Law 5002/2022.

As regards the first part of the question, according to the contribution of the Prosecutor of the Supreme Court, no observations can be provided in respect of cases that are at the stage of ongoing judicial investigation, whether during criminal pre-trial proceedings or the trial stage.

As regards the second part of the question, the draft presidential decree provided for in Article 13 of Law No 5002/2022 (GG A' 228), in view of the legal complexity and the technical intricacy of the issues it addresses, as well as the processing required under national law by the independent authorities and the competent Ministries, is currently at the stage of review and finalisation.

D. The enabling framework for civil society

1.Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration, transparency and dissolution rules)

A. Ministry of Interior

a. Statistical data on the implementation of Law 4873/2021

With the implementation of Law 4873/2021 (GG A' 248) (112), the Ministry of Interior established for the first time a stable, unified and clear regulatory framework, which sets out the basic rules for the organized and smooth functioning of civil society, its organizations, and volunteerism (113).

The regulatory framework, which has been in force since 2022, has been found to be desirable and fully acceptable to organized civil society, a fact that is expressed both in the systematic meetings held by the Ministry of the Interior with the organizations and in the large number of bodies that have already made use of the procedures and benefits of the law to date.

Specifically, the total number of registered CSO in the "Public Database" amounts to 2,175, representing an increase of 110% (1,031 CSO were registered in January 2025). Similarly, in the "Special Register," the total number of definitively registered CSOs has risen to 771, an increase of 14.2% compared to the 675 registrations that had been finalized by January 2025.

b. The legal framework - Amendments to Law 4873/2021 by Law 5270/2026, GG 9 A/23.1.2026 – Key provisions:

The Ministry of the Interior, in constant dialogue, cooperation, and consultation with civil society, has sought to continuously improve the regulatory framework with the constant goal of forming a strong civil society with independent action. A similar initiative for continuous improvement is the new draft law of the Ministry of the Interior, which was voted by Parliament on January 12, 2026 (Law 5270/2026, GG 9 A/23.1.2026), and includes a set of specific but substantial amendments to Law 4873/2021.

These amendments were the **result of dialogue with civil society organizations**, satisfy reasonable and rational demands, and, above all, further strengthen their action and operation. It is noteworthy that the relevant provisions did not receive any comments during their public consultation on the online portal www.opengov.gr.

An indicative improvement is the **amendment of the provision of Article 8 of Law 4873/2021**, according to which, for persons who have attended or joined rehabilitation and social reintegration programs as rehabilitated or recovering individuals, a conviction for a misdemeanor under the drug law no longer constitutes an impediment to their appointment as members of the administrative bodies of registered organizations active in the relevant fields. In this way, the political leadership of the Ministry of Interior

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https://www.kodiko.gr/nomologia/downloadfek?f=fek/2021/a/fek_a_248_2021.pdf&t=f87ed42eab3b39f70e2fe64ebc5f1da2)

¹¹³ As provided for in our input on RoL 2025, this legislative framework supports and strengthens civil society without creating unnecessary obstacles, providing incentives in a manner and to an extent that ensures its independence. At the same time, it establishes conditions of transparency and accountability, which are key to strengthening citizens' trust in organizations, which are the driving force behind volunteering and the development of an active, dynamic, and effective civil society. This regulation laid the foundations for the unified registration, initially, of organizations whose activities are supported by the state through state funding, as well as through a significant number of tax incentives and exemptions, within a framework of transparency and accountability, as mentioned above. The ultimate goal of the institutional framework was to address the existence of many different initial registration registers and the corresponding multiple submission of the same supporting documents, through a first but particularly important step towards rationalization.

responds to yet another request from representatives of organizations active in rehabilitation programs, whose administrative members may be former drug addicts.

Similarly, the amendment to paragraph 2(c) of Article 7 of Law 4873/2021 significantly strengthens the operation of **smaller organizations**, in the context of proportional equality, by increasing the required percentage of total employees from 5% to 10% of which the entity is allowed to conclude employment contracts with persons participating in the administrative bodies or members or partners who have statutory control or spouses or parties who have entered into a cohabitation agreement or children and parents of the above persons. In this way, small civil society organizations employing fewer than 10 employees will be able to conclude at least one such employment contract, which will significantly strengthen their operation and daily activities. On the other hand, in order to ensure transparency and sound management, limits are set (up to 3 contracts with members of the administrative bodies and with a value not exceeding twice the national minimum wage for each contract).

Furthermore, the new Law of the Ministry of the Interior provides for the operation of the "**Observatory of Civil Society Organizations and Other Non-Commercial Economic Activity Entities**." This regulation ensures that all civil society organizations are registered in one place without any administrative control procedures and, therefore, without the submission of supporting documents. It should be noted that Law 4873/2021 aims to ensure transparency and accountability for organizations that are supported or wish to be supported by public funding and does not apply to all organizations. Registration with the Observatory involves simply submitting basic information, which gives organizations the necessary recognition and visibility to all interested parties. The Ministry of the Interior wants the Observatory to serve as a hub for communicating the existence of each organization, but also as a means of highlighting and promoting their work and actions. It will include basic and critical information useful for citizens who wish to participate as volunteers, for those who want to be informed about the activities of organizations, as well as for companies interested in funding actions within the framework of corporate social responsibility. The Observatory is one of the most important initiatives to strengthen civil society, as it increases the visibility of organizations, promotes their work, facilitates volunteering, and seeks to bring them into contact with private initiatives.

At the same time, it is worth noting that Law 4919/2022 of the Ministry of Development, and in particular Article 52, provided for the establishment of the **Register of Non-Commercial Economic Activity (M.M.E.O.D.)**, in which all entities not engaged in economic activity, including civil society organizations, would be registered through the development of a new information system. In order to address the fragmentation of registries, it is clear that no new information system will be created and that the needs of the Ministry of Development will be met by the system already developed by the Ministry of the Interior, the existing databases, and, of course, the Observatory.

Another important addition to the existing legislative framework is the explicit introduction of the "**once only principle**" (**OPP**) in the context of registering active CSOs in Greece. Given the existence of many different registers, the application of this principle is a decisive step, as it ensures that a document that has been submitted once to a public body will not be requested again, but will have to be sought through cooperation and interconnection between public authorities. The implementation of this principle will be technically implemented in each new interoperability between the PS of the Ministry of Interior and the individual registers/PS that also keep data on civil society organizations. In this context, the Ministry of Interior's IT system is ready to interoperate with the Ministry of Migration's IT system, which is currently under development, having taken care of the technical implementation by applying the principle only once.

Finally, the new bill of the Ministry of the Interior also includes a very important provision for civil society organizations that have the legal form of an association. In particular, the relevant regulation reduces bureaucracy and simplifies the administrative procedures arising from the supervision of associations by the country's regions, thus facilitating their operation.

c. The Joint Ministerial Decisions no 13359 (GG B 4600) and no 16884 (GG B 5712) and the relevant circulars.

In addition to the new draft law, to supplement Law 4873/2021 on O.K.O.P., the political leadership of the Minister of Interior has recently issued two secondary regulatory provisions in collaboration with representatives of the organizations.

In August 2025, Joint Ministerial Decision No. 13359 of the Ministers of the Interior and National Economy and Finance (GG B' 4600) was issued, specifying the list of special-purpose vehicles and other

vehicles belonging to public benefit institutions and registered OKIP, which are exempt from road tax. For the effective implementation of this regulation, a relevant circular of the AADE was issued on 9-9-2025 with ref. no. ΔΕΕΦ Β Ε2075 ΕΞ 2025.

At the same time, at the end of October 2025, Joint Ministerial Decision No. 16884 of the Ministers of the Interior and Digital Governance (GG Β'5712) was issued on the operation of the "Special Electronic Register of Regional Supervisory Associations," in accordance with Article 29 of Law 281/1914 (Α' 171), for the registration and periodic submission of data. More specifically, the above Joint Ministerial Decision applies to Regional Supervisory Associations, i.e. associations that are described, established, and operate in accordance with Articles 61 to 106 of the Civil Code and are supervised by the competent services of the Regions of the Greek state. The decision modernizes and digitizes the procedure provided for in the old legal regime for associations of "other purposes" under Law 281/1914 or associations "General Purpose" associations under Article 33 of Law 5027/2023, establishing a special register for the so-called Regional Supervision Associations. The special electronic register is an operational part of the Public Database of CSOs of Law 4873/2021, and the competent services of the country's Regions are responsible for processing personal data.

d. Other initiative and actions of the Ministry of Interior:

1. In 2025, there was a high number of actions—face-to-face meetings or teleconferences with CSO, of which the following are indicative:

- an in-person meeting, upon invitation, with CSO registered and not registered in the records of the Ministry of the Interior, at the Ministry of the Interior's stand at the Thessaloniki International Fair (September 2025).
- face-to-face meeting between the political leadership and officials of the ministry with the Down Syndrome Association of Greece (September 2025)
- Face-to-face meeting between officials from the Directorate of CSO and Public Benefit Organizations of the Ministry of the Interior and representatives of the Federation of Forest Firefighting and Forest Protection Associations (November 2025).
- Volunteering day in the Attica Region with the participation of 66 municipalities in Attica (December 2025).

2. Also, in September 2025, representatives of the CSOs Directorate of the Ministry of Interior participated in the Thessaloniki International Fair, where they presented the work of the ministry to the general public of Northern Greece, namely the existence of electronic databases, the tax incentives offered to CSO and, more generally, the benefits of registering with them, both for the CSO themselves and for society as a whole.

In addition to the ad hoc meetings mentioned above, which are held regularly as part of a structured and organized dialogue with OKOIPs, the political leadership and the competent Directorate of the Ministry of the Interior establish an annual meeting with representatives of CSO every February, at which issues of concern to them will be discussed, such as the promotion of their work, strengthening and improving their operational framework, ensuring transparency, integrity, good management, and accountability, etc. Specifically, for 2026, the meeting will take place in November.

It should be noted, as mentioned in chapter 2.4 of the Bodossaki Foundation's Action Plan for Civil Society, the establishment of a collective body representing civil society organizations at the secondary or tertiary level would significantly facilitate the further strengthening and development of a structured and systematic dialogue between the state and civil society.

B. Ministry of Migration and Asylum:

Given the challenges in the registration and mapping of civil society organisations (CSOs), including fragmentation of registries and limited implementation of digital interoperability, Greece is actively advancing on the strengthening of a structured dialogue with CSOs while addressing registration and mapping challenges.

Collaboration with the European Commission provides guidance and technical expertise on best practices for structured dialogue, ensuring it is regular, long-term, and results-oriented, and helping align domestic processes with EU standards.

Greece has taken targeted measures under two complementary frameworks:

1. The Ministry of Migration and Asylum (MOMA) is focusing on NGOs operating in migration and asylum:

a. Obligation to Register in the Registry of Greek and Foreign NGOs and the Members' Registry

Pursuant to Article 78 of Law 4939/2022, in force, in order for an NGO to participate in the implementation of actions related to international protection, migration, and social integration within the Greek territory, it must be mandatorily registered in the NGO Registry provided for under that Article. The same obligation currently applies to the registration of all members of NGOs operating in Greece in the NGO Members' Registry. Consequently, failure to register—either of the NGO itself or of its members—in the respective registries, results in a complete inability to operate within Greece.

Under the provisions of the draft law already submitted to Parliament and expected to be adopted on 4 February 2026, Article 78 is explicitly amended (see Article 56 of the draft law) so that the sole consequence of non-registration of NGOs in the NGO Registry will be the inability to receive state or EU funding and to operate within the facilities of the Ministry of Migration and Asylum, rather than a complete prohibition on operating within Greek territory, as currently applies. Registration, therefore, becomes mandatory only for NGOs that receive state or EU funding or operate within the structures of the Ministry of Migration and Asylum.

Accordingly, under the same draft law, the obligation to register members in the NGO Members' Registry will be limited only to the members of those NGOs that are registered in the NGO Registry—either because they receive state or EU funding, because they operate within the structures of the Ministry of Migration and Asylum, or because they voluntarily choose to register in order to gain direct access to funding or to the Ministry's structures.

The above provisions are the result of consultations with the competent authorities, civil society, and DG HOME and will be inserted in the draft law until its adoption by Parliament.

b. Simplification of Supporting Documents for Registration in the NGO Registry

The simplification of the supporting documents required for registration will follow the adoption of the draft law, through the issuance of an updated regulatory act, which is already under preparation and is expected to be submitted shortly.

c. Interoperability of the NGO Registries of the Ministry of Migration and Asylum and the Ministry of Interior

The tender procedure pursuant to Article 119 of Law 4412/2016 has been completed. Three (3) bids have been submitted and approved at the level of technical specifications. The process is currently at the stage of opening the financial offers for the selection of the contractor.

d. Programme Agreements of the Ministry of Migration and Asylum

With the amendment of Article 61 of Law 4609/2019 (Government Gazette A' 67), the possibility for the Ministry of Migration and Asylum to conclude programme agreements with NGOs, charitable foundations, endowments, credit institutions, and special financial organizations—namely, to proceed with direct awards to such entities—is formally abolished. In this way, the national legal order is brought into compliance with overriding EU public procurement law (Directives 2014/24/EU and 2014/25/EU), as transposed by Law 4412/2016 (Government Gazette A' 147) on public works, supplies, and services contracts.

The Court of Audit had repeatedly ruled in favor of the non-application of the repealed provisions due to their incompatibility with EU law (indicatively, Decisions ES/Chamber Z/47/2023 and ES/Chamber Z/458/2023). It is clarified that the above entities may always participate in tendering or negotiation procedures as otherwise provided for under the applicable legislative framework.

e. Composition of the Independent Appeals Committees of the Appeals Authority of the Ministry of Migration and Asylum

The Plenary of the Council of State, by Decision No. 1150/2025 (published on 26 June 2025, with effects as of 25 June 2025), following a preliminary question submitted by the Administrative Court of First Instance of Thessaloniki (Decision No. 534/2022), ruled that the single-member composition of the Independent Appeals Committees of the Appeals Authority of the Ministry of Migration and Asylum—before which administrative appeals against decisions of the Asylum Service are brought—is unconstitutional. The draft law adapts the legislation accordingly to comply with the decision of the Plenary of the Council of State.

f. Coordination Committee for Migration Policy and Social Integration

The draft law establishes a Coordination Committee for Migration Policy and Social Integration, composed of representatives of all competent ministries and, potentially, representatives of Decentralized Administrations, local authorities, international organizations, the National Commission for Human Rights (this addition followed hearings before the competent parliamentary committee), and civil society.

The purpose of the Committee is to formulate national strategies and objectives concerning legal and irregular migration and social integration, and to coordinate the actions of the involved stakeholders.

2. Rules and practices having an impact on the effective operation and safety of civil society organisations and human rights defenders. This includes measures to protect them from attacks – verbal, physical or on-line –, intimidation, legal threats incl. SLAPPs, negative narratives or smear campaigns, measures capable of affecting the public perception of civil society organisations, etc. It also includes measures to monitor threats or attacks and dedicated support services, as well as available remedies.

Please see our answer above on the relevant topic on SLAPPS:

3. Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding)

Please see above on the relevant topic for the Registries, as well as on our response on Accountability – Transparency.

E. Initiatives to foster a rule of law culture

This can include developments related to initiatives to foster a rule of law culture, please specify which, (e.g. debates in national parliaments on the rule of law, public information campaigns on rule of law issues, contributions from civil society, education initiatives, etc.):

Under Pillar I- Justice, reference has already been made to the sustained efforts undertaken by both the Government and the Judiciary to strengthen public trust in the justice system and in institutions more broadly, as well as to foster a culture of the rule of law (child-friendly justice programme, study visits and educational activities for students at all levels at the Council of State, cooperation with educational and academic institutions, the reinstatement of student internships, active participation in European and international judicial networks and exchanges, annual reports of the Council of State and the Court of Audit, addressed to the of a Court Spokesperson in Supreme Courts, regular issuance of accessible summaries of landmark general public, the appointment judgments etc. (for more information, please

see above under “Significant developments capable of affecting the perception that the general public has of the independence of the judiciary”).

Beyond the above, highly significant initiatives aimed at fostering a culture of the rule of law have also been undertaken by the Ministry of Education, the Hellenic Parliament and other competent bodies, as outlined below:

a. Ministry of Education, Religious Affairs and Sports

In Greece, fostering a culture of the Rule of Law is systematically promoted through school education, via coordinated initiatives covering the entire span of compulsory education. A central role is played by the Ministry of Education, Religious Affairs and Sports, in cooperation with the Institute of Educational Policy (IEP), which designs, supports and evaluates educational policies and actions with a strong focus on democratic education, human rights and active citizenship.

i. The cooperation between the Institute of Educational Policy (IEP) and the Council of State.

The Institute of Educational Policy (IEP), recognizing the decisive role of education in shaping active, responsible and institutionally literate citizens, developed a partnership with the Council of State (CoS), with the aim of strengthening awareness and understanding within the student and educational community regarding:

- the institution of Justice,
- the functioning of the Supreme Administrative Court,
- the principles of judicial independence and the rule of law.

This cooperation forms part of a broader educational strategy that views the school as a key space for the cultivation of democratic values, institutional trust and active citizenship.

The objectives of the IEP–CoS partnership are:

- familiarising students of all educational levels with the institution of Justice,
- introducing them to the judicial system and, in particular, to the Council of State,
- strengthening institutional education and legal awareness,
- fostering young people’s trust in democratic institutions.

Through this cooperation, the IEP strengthens the role of the school as a space for shaping responsible citizens, equipped with the knowledge, skills and values that underpin the rule of law and democratic society, by integrating them organically into the educational experience.

The cooperation includes, indicatively, the following areas of activity:

- Organisation and support of initiatives for the teaching of institutional values and the development of legal awareness.
- Exploration of ways to integrate relevant thematic areas into the national curricula.
- Development of a framework for educational visits of students to the Council of State and the pedagogical use of these experiences.
- Development and dissemination of educational material to the educational community.
- Organisation of conferences, workshops and events, as well as participation in projects of common interest.

The first action was carried out on Monday, 6 October 2025, with the visit of 40 Education Advisors (Primary Education – PE70, Mathematics – PE78 and Social Sciences – PE80) to the Council of State, following an open call for expressions of interest issued by the IEP, and in continuation of a relevant initiative by the Minister of Education, Religious Affairs and Sports.

Advisors from the IEP Scientific Service also participated in the action.

During the visit, a substantive and constructive dialogue took place between judicial officials and education professionals, focusing on:

- the cultivation of institutional education among students,
- the strengthening of legal awareness,
- the exploration of pedagogical ways to integrate these themes into teaching practice.

The action highlighted the pedagogical value of educational visits and laid the foundations for the design of targeted awareness-raising and dissemination initiatives for the wider educational community.

The central deliverable of the action is the “Framework for Educational Visits and the Use of Outcomes in Teaching Practice”, which is being jointly developed by the participating Education Advisors.

The material will include proposals and tools relating to:

- the development of digital educational material on the institution of Justice and the Rule of Law,

- the design of activities that cultivate social and civic competences,
- the structuring of educational visits and experiential learning activities,
- the definition of roles for preparation and evaluation of actions,
- the pedagogical use of evaluations to enhance the learning process.

The material will be published on the IEP website and will support:

- information activities for teachers,
- visits of Council of State judges to schools,
- special thematic features on the institution of Justice.

Within the same framework, the IEP published the Teachers' Guide entitled "School Education for the Rule of Law"¹¹⁴, which was presented by IEP Advisors in the context of the cooperation with the Council of State.

The Guide:

- systematically supports education for the rule of law,
- strengthens the planning and pedagogical use of educational visits,
- contributes to the dissemination of institutional knowledge within the educational community.

ii. "Active Citizenship Actions" in Primary and Secondary Education.

From the 2024–2025 school year, the "Active Citizenship Actions" Curriculum has been implemented in all grades of Primary and Secondary Education.

Pursuant to Ministerial Decision 130372/ΓΔ4/01-11-2024, entitled "Curriculum 'Active Citizenship Actions' for Kindergarten, Primary School, Lower Secondary School (Gymnasium) and Upper Secondary School (Lyceum)" (GG B' 6048), the Curriculum integrates the 17 Sustainable Development Goals (SDGs) as adopted by the United Nations (UN) in 2015.

Indicatively, reference is made to the thematic unit "SDG 16: Peace, Justice, Social Equity and Strong Institutions", through which students participate in initiatives that promote human rights and justice, supporting efforts to prevent discrimination and to uphold the rule of law.

Students of Lower Secondary School (Gymnasium) and General Upper Secondary School (Lyceum), through the curricula of various subjects, are taught issues relating to the administration of justice, the functioning of institutions, pluralism, and the freedom of the mass media. Indicatively, reference is made to:

Home Economics, Grade A & B of Gymnasium, Unit 1.4:

"Communication and problems – Mass Media"

Social and Civic Education, Grade C of Gymnasium:

Chapter 8: "Forms of Government and the Constitution" –

8.4.2 "Rule of Law",

8.4.4 "Principle of Separation of Powers";

Chapter 9: "Elections, political parties, mass media";

Chapter 10: "Functions of the State"

Civic Education, Grade A of General Lyceum:

Chapter 6: "Socialisation and politicisation" –

6.2.4 "Mass Media";

Chapter 8: "Decision-making" –

8.4 "The legislative process – decision-making by Parliament"

b. Visits to the Hellenic Parliament

Pursuant to Article 7 of Ministerial Decision No. 20883/ΓΔ4/12-2-2020 (GG B' 456), entitled "Excursions – Educational visits and student movements of Public and Private Secondary Education schools within and outside the country":

"(a) During the school year, visits to the Hellenic Parliament by Secondary Education schools may take place following an invitation by the President of Parliament, subject to the approval of the programme by the Ministry of Education and the submission of a relevant application by the school.

(b) These visits are included in educational excursions, constitute an independent programme and concern students of all grades of Secondary Education."

¹¹⁴ <https://www.iep.edu.gr/wp-content/uploads/2025/10/20251022>

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Furthermore, according to the letter of the Secretary General of the Foundation of the Hellenic Parliament for Parliamentarism and Democracy, which was forwarded to secondary education schools by our Service under document No. Φ14/110565/Δ2/11-09-2025, entitled “Forwarding of the Letter of the Secretary General of the Foundation of the Hellenic Parliament for Parliamentarism and Democracy”:

“Students are guided through the Plenary Hall and the historical exhibitions hosted in the ‘Eleftherios Venizelos’ Hall. They are informed about the organisation and functioning of Parliament and about the basic principles and values of the democratic system. If their visit coincides with parliamentary sittings, they observe the session for a few minutes from the galleries of the Plenary Hall.”

In addition, the Foundation of the Hellenic Parliament for Parliamentarism and Democracy, in cooperation with the Ministry of Education, Religious Affairs and Sports, implements the educational programme “Parliament of Youth: Steps of Democracy – Putting Participation into Practice.”

The programme is addressed to students of General and Vocational Upper Secondary Schools in Greece, as well as Greek Lyceums abroad. The maximum age limit for participation is 21 years.

The main objectives of the programme are:

- familiarising adolescents with the principles and values of democracy,
- introducing them to the functioning and role of Parliament,
- training them in democratic practices and activating them in issues concerning the school, the community and society.

The programme seeks to offer students not only knowledge, but also a platform for personal expression and creativity, as well as opportunities for reflection, dialogue and participation.

Youth Members of Parliament are selected from groups of students – Participatory Action Groups – that have carried out socially oriented activities in their schools and communities during the programme.

c. The “Parliament of Youth: Steps of Democracy – Putting Participation into Practice”

This programme forms part of the educational process and school life throughout the school year. The programme is optional for teachers and students and flexible, as it may be implemented either as an independent programme outside teaching hours or within the framework of school activity programmes (cultural projects, environmental education, health education, etc.).

For the 2025–2026 school year, Circular No. Φ14.1/98437/Δ2/08-08-2025 was issued by our Service, entitled: “Educational Programme ‘Parliament of Youth: Steps of Democracy – Putting Participation into Practice’ – L Session – School Year 2025–2026.”

Moreover, within TSI Project 24EL04, titled “Integrating AI Technologies in the Greek Public Administration”, and specifically Output O.5 (Report on the implementation of AI proof of concept use cases in the public sector), the Ministry of Education, Religious Affairs & Sports has been selected as a Proof of Concept case, focusing on actions related to the introduction of AI in education. The Ministry of Education part will commence in 2026 and will include a state-of-play domain assessment in Greece, with regulatory readiness as a key dimension, examining alignment with national developments such as the National AI Blueprint, the opinions of the National Bioethics and Technoethics Committee, and Article 40 of Law 5237/2025 on AI use and teacher training.

d. National Strategy for Media Literacy is being established with the aim of comprehensively strengthening citizens' information and communication literacy, cultivating critical reception and content production skills, strengthening the public sphere's resilience to misinformation, and upgrading the State's institutional communication.

The Strategy has a three-year time frame and is structured around thematic axes, including specific objectives, policy measures, indicative actions, implementing bodies, effectiveness assessment indicators, and an implementation timetable, under the coordination of the General Secretariat for Communication and Information.

e. Speeches and lectures in schools on preventing, investigating, and prosecuting cybercrime.

For the purpose of preventing, investigating, and prosecuting cybercrime, at least 800 relevant speeches and lectures have been given in schools and institutions since the beginning of the year, while new informational and educational material is continuously added to the website www.cyberalert.gr (see the Consolidated Government Policy Plan 2025).

F. Update on the follow-up to the Pylos shipwreck (ongoing criminal proceedings and possible administrative/disciplinary proceedings/ follow-up to the Ombudsperson report).

With regard to the aforementioned targeted question, it is not possible to contribute on cases that are at the stage of ongoing judicial investigation, whether at the stage of criminal pretrial proceedings or at that of the main hearing before the court.

1. In relation to the investigation conducted following the Pylos shipwreck, and further to a query submitted by the Minister of Maritime Affairs and Insular Policy concerning disciplinary jurisdiction over acts and omissions of officers of the Hellenic Coast Guard, the Fourth Section of the Legal Council of the State issued its Opinion No. 84/2025, the acceptance of which by the competent Minister is imminent.
2. With regard to the shipwreck of Pylos, it is reported that the H.C.G. competent Service has been informed that criminal prosecution has been initiated against four (04) additional officers of the Hellenic Coast Guard. With respect to the legislative developments, it is stated that a new disciplinary framework has been drafted by Personnel Directorate of the H.C.G., taking into account, on the one hand, cases that are not covered by the pre-existing legislative framework and, on the other hand, the needs of the modern era, in the line with the principles of the administration and legal certainty, contemporary social and administrative developments, as well as the applicable European standards.»
3. In this regard, it should be noted that in every case of notification of an alleged violation of human rights or incidents of arbitrariness by Coast Guard-ELAKT officials, the Hellenic Coast Guard Headquarters shall evaluate the content thereof, in accordance with the information collected, and forward it to the competent levels of the hierarchy for their information and instructions on how to proceed. If the evidence is deemed sufficient, either a Sworn Administrative Inquiry (E.D.E.) in accordance with Regulation 64 (B'1122/2002) or an Administrative Investigation is ordered without delay. Subsequently, the files of the aforementioned E.D.E. are forwarded to the competent Public Prosecutor's Office for information and correlation with any parallel criminal proceedings (Law 4620/2019, as applicable).
4. In addition, they are forwarded, as appropriate, to the Ombudsman, who, in his capacity as the National Mechanism for Investigating Arbitrary Acts, assesses the completeness of the investigation and has the option of referring it back for completion (Article 1 of Law 3938/2011, as applicable). Finally, the transmission of the EDE files to the competent Public Prosecutor's Office and the Ombudsman is notified to the Liaison Officer for Cooperation with the Fundamental Rights Protection Officer at the Ministry of Migration and Asylum.

G. Targeted question: Information on the application of Article 31 of Law 5119/2024 (restrictions on the recording and transmission of court proceedings), if any.

According to the contribution of the Prosecutor's Office of the Supreme Court, with regard to this targeted question, it is not possible to provide observations due to the lack of available data, as this would require a separate review of the file of each criminal case pending before a court or a prosecutor's office in the country.

E. Targeted question: Any updates/developments regarding the issue of immunities of members of Government, including on the efforts reported in the 2025 Report to ensure that the judiciary is more involved.

In a recent announcement on 2 February 2026, the Prime Minister reiterated the Government's intention to include, inter alia, Article 86 of the Constitution in the proposal for constitutional provisions to be revised

Other – please specify:

The National Strategy for the Protection of Minors from Internet Addiction:

Within the framework of rules and practices aimed at ensuring the safety of users in the digital environment, Greece has developed a dedicated National Strategy for the Protection of Minors from Internet Addiction. The Strategy addresses phenomena linked to the increased exposure of minors to online risks, including harmful and addictive design practices embedded in digital platforms, which may adversely affect minors' mental health, safety and overall well-being.

The Strategy is structured around three complementary pillars, encompassing legislative and regulatory interventions, technological solutions, as well as information and educational initiatives addressed to minors and their parents or legal guardians. At the regulatory level, Greece has undertaken initiatives and submitted concrete proposals in the context of the Digital Services Act (DSA), notably with regard to the establishment of a European digital age of consent, obligations for platforms to avoid addictive interface design, and the limitation of algorithmic practices that may lead to manipulation or excessive exposure of minor users.

In terms of technological measures, Greece has introduced the Kids Wallet, a digital tool that brings together age verification, parental control functionalities and secure digital identification for minors. In parallel, preventive and awareness-raising actions are being implemented, including educational initiatives in the school environment, such as the establishment of a dedicated "Digital Navigation Day", aimed at strengthening digital literacy and awareness of online risks.

Overall, a coherent framework of measures is in place, seeking to reduce minors' exposure to harmful online practices and forms of digital harm or abuse, and thereby contributing to the enhancement of safety and protection for vulnerable persons in the digital space.

Cross-pillar elements: cross-border rule of law issues related to the Single Market

If you are aware of any significant challenges concerning the Single Market faced by businesses or citizens from your Member State in a cross-border context relating to any of the four pillars of the report, including for example issues with market access and the conditions for economic activities, please highlight them in your input.

Please see above under Pillar II.

As regards the publication of your written input:

We consent

ANNEXES FOLLOW:

ANNEX I: JUDICIALS STATISTICS

ANNEX II: NATIONAL SCHOOL OF JUDICIARY

ANNEX III: ANTI-CORRUPTION FRAMEWORK

ANNEX IV: JUDICIALS STATISTICS ON PRESS AND MEDIA

ANNEX I - STATISTICAL DATA REGARDING THE OUTCOMES OF THE IMPLEMENTATION OF THE JUDICIAL MAP, THE NEW PROCEDURAL FRAMEWORK OF THE COUNCIL OF STATE, AND THE EFFICIENCY OF THE ADMINISTRATIVE COURTS

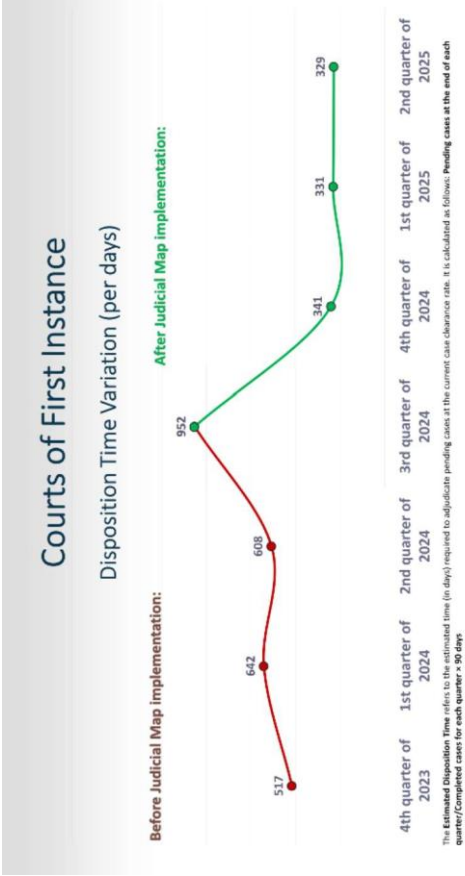
I. JUDICIAL MAP

The following statistical data derive from a broader ad hoc study conducted by the Autonomous Department for the Collection and Processing of Judicial Statistical Data (JustStat) of the Ministry of Justice. The study concerns a comparative assessment of the effectiveness of the Courts of First Instance with regard to civil procedure, during a nine-month period following the implementation of the Judicial Map (September 2024 to June 2025), as compared to the corresponding period prior to its implementation (September 2023 to June 2024).

The focus of the study on civil cases is attributable to the fact that judicial officers formerly serving in the Magistrates' Courts were predominantly integrated into civil court formations, given that, during their tenure in the former Magistrates' Courts, they primarily adjudicated civil matters.

13

*Change in Estimated Time to Judgment Issuance



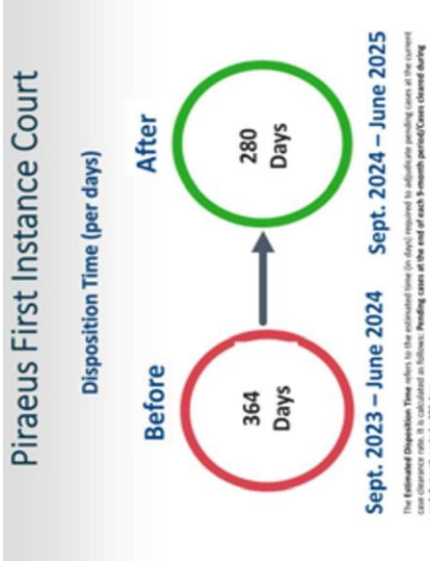
*Case clearance rate , 9 months after the implementation of the Judicial Map, across all Courts of First Instance in thw Country



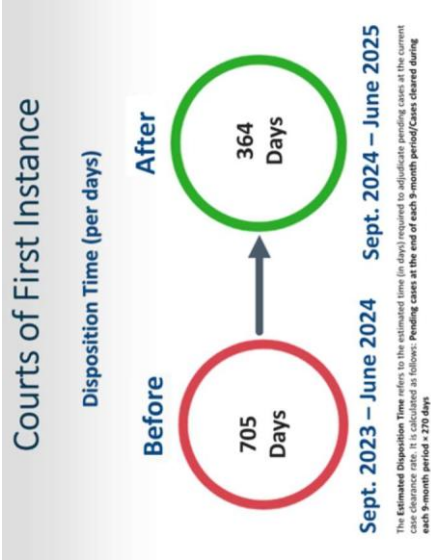
*Estimated Time to Judgment Issuance at the Court of First Instance of Athens, 9 Months after the Implementation of the Judicial Map



*Estimated Time to Judgment Issuance at the Court of First Instance of Piraeus, 9 Months after the Implementation of the Judicial Map



***Estimated Time to Judgment Issuance after the Implementation of the Judicial Map (All Courts of First Instance)**



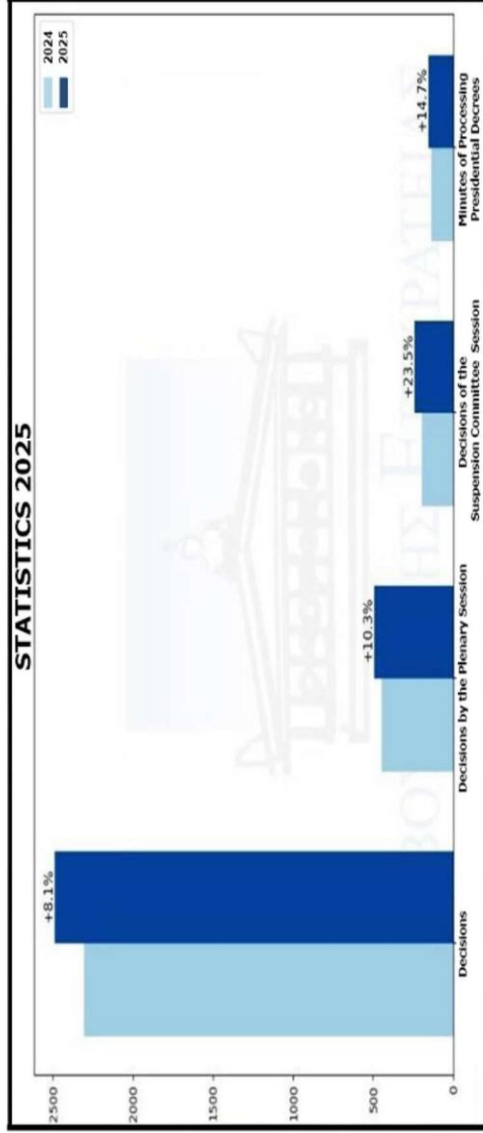
***Estimated Time to Judgment Issuance at the Court of First Instance of Thessaloniki, 9 Months after the Implementation of the Judicial Map**



II.RESULTS OF THE NEW PROCEDURAL FRAMEWORK OF THE COUNCIL OF STATE

The results for the Council of State in 2025, the year of application of the new procedural framework of the Council of State:

- ✓ 2490 decisions (increase of 8.1% compared to 2024)
- ✓ 494 decisions by the Plenary Session (increase of 10.3% compared to 2024)
- ✓ 242 decisions of the Suspension Committee (increase of 23.5% compared to 2024)



III. ANNUAL EFFICIENCY OF ADMINISTRATIVE COURTS (DATA FOR THE PERIOD FROM 16.9.2024 TO 16.9.2025)

*Annual Case clearance rate of Administrative Courts of Appeal (Reference Year 2025)

Data of first and Second Instance

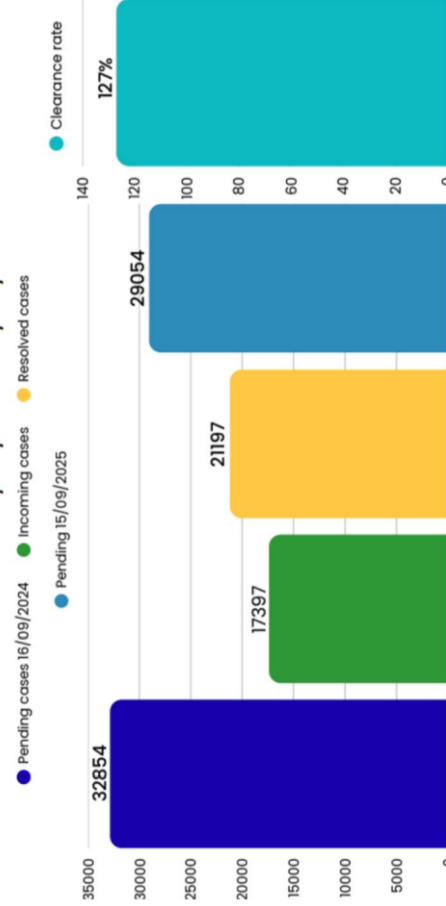
Statistics 16/09/2024-15/09/2025



*Comparative Clearance Rate (1st & 2nd Instance) - Ordinary Administrative Courts (2024-2025)

Second instance data

Statistics 16/09/2024-15/09/2025



ANNEX II NATIONAL SCHOOL OF THE JUDICIARY

A. SEMINARS AND TRAINING WORKSHOPS FOR THE EDUCATION AND PROFESSIONAL TRAINING OF JUDGES, PROSECUTORS AND JUDICIAL OFFICERS 2025-2026

I. Initial Training in 2025 (for trainee judges and prosecutors)

1. “Charter of Fundamental Rights – Children’s Rights – Child-Friendly Justice”,

(including: Directive (EU) 2016/800 on procedural safeguards for children who are suspects or accused persons in criminal proceedings, Child-friendly justice for children with disabilities and/or psychosocial difficulties, Child-friendly justice under the Code of Criminal Procedure; (case law of the CJEU et ECtHR), Forensic examination of the minor victim during the pre-trial stage, Children’s rights under the Charter of Fundamental Rights of the E.U. and their application by CJEU, Criteria for specifying the interests of the child in cases of removal of parental responsibility and foster care, Judicial expert evidence in cases involving minors, the United Nations Convention on the Rights of the Child).

2. “Law and Informatics” ,

(including: economic crime in cyberspace and cryptocurrencies, procedural handling of cybercrime, artificial intelligence and justice – the EU legal framework and challenges following Regulation (EU) 2024/1689, algorithmic justice in criminal cases: an acceptable option for the rule of law?, electronic evidence: discovering the truth in criminal proceedings, technology-enabled criminality – legislative tools for its prevention and suppression).

3. “Protection of Victims of Crimes Involving Serious Forms of Discrimination

(racism, xenophobia, religious intolerance, disability, sexual orientation, gender identity, expression or characteristics) in EU Member States

4. “Public Sense of Justice and the Rule of Law”

(including: Public sense of justice and channels of its impermissible influence on criminal judgments, Public sense of justice in the production of legal norms and in the substantiation of judicial decisions, The criminal judge in the face of interventions by political power, Public sense of justice, mass media and judicial authority.

e. Judicial officers and social media, The social construction of reality by the media – jurors’ attitudes – the position of judges, Trial by media and public sense of justice versus judicial neutrality and impartiality).

5. “European Criminal Law – Preliminary Ruling – Legislative Developments in EU Law on Civil Liability for Compensation”

(including: preliminary ruling mechanism before the CJEU, state liability for failure to submit a preliminary reference to the CJEU, issues of interpretation and application in criminal proceedings, european criminal law and preliminary ruling mechanism, combating bribery through criminal law instruments, procedural rights of suspects and accused persons in CJEU case law, harmonisation of Greek substantive environmental criminal law with EU law).

6. “Digital and Virtual Economy”

(including: Justice in the digital era, Smart contracts and issues of liability arising from the application of artificial intelligence systems, the impact of intelligent non-biological agents on fundamental principles of law, regulation (EU) 2023/1114 on markets in crypto-assets, legal issues in the context of the metaverse, competition law rules – collusion, algorithms and vertical restraints on the effective use of the internet, digital economy, abuse of dominant position-, cryptocurrency transactions and their assessment under private law).

II. Seminars to be organized in 2026 (for trainee judges and prosecutors):

1. Law and Information Technology (Intellectual property in information technology – Artificial intelligence systems in the field of justice – Cybercrime).

2. Ethical issues. Mass media and the criminal trial.

3. Electronic crime / Internet crime / Cybercrime / Crime in cyberspace.

4. The Common Sense of Justice (including, inter alia (including: sense of justice and natural law, the common sense of justice and its influence on the production of legal rules by the legislator, the common sense of justice versus judicial decisions, impermissible intrusion into judicial reasoning and channels through which such intrusion is attempted (press, mass media, social media, “trial by media”, opinion polls, social groups and institutions, interventions by the political authority (the legislator) before, during and after judicial review, considerations of expediency and invocation of the public interest, court press offices and spokespersons, full transparency and the appearance of impartiality, the rule-of-law judge and the role of jurors).

5. Special Issues in Public Procurement

III. 2025 Continuous training (judges and prosecutors)

1. Energy law and renewable energy, including environmental licensing, spatial planning for renewable energy sources, protection of NATURA areas, energy security, public procurement in the energy sector, artificial intelligence applications and personal data protection, in light of national, EU and CJEU case law.

2. Independent authorities and the rule of law, covering parliamentary oversight of independent authorities, judicial review as a guarantee of the rule of law and of the effectiveness of independent authorities’ actions, pre-contractual audit by the Hellenic Court of Audit and pre-judicial review before the Hellenic Single Public Procurement Authority, institutional coexistence of the Hellenic Court of Audit and independent authorities within the framework of modern fiscal control, contribution of the Hellenic Competition Commission to the rule of law, the Hellenic Authority for Communication Security and Privacy, the Authority for Combating Money Laundering and Terrorist Financing and its role in the European and international environment, the Hellenic Data Protection Authority (HDPa) and its contribution to the rule of law, National Council for Radio and Television: the “first” independent authority – structure and operation, the Ombudsman and the protection of prisoners’ rights in a European rule-of-law state.

3. Protection of fundamental rights under the Constitution, the European Convention on Human Rights and the EU Charter of Fundamental Rights, including proportionality and balancing of competing rights, climate change and environmental protection, privacy and surveillance technologies, citizenship and EU law, recovery of public resources, pension and property rights, and the application of Article 6 ECHR in disciplinary proceedings.

4. Economic and financial crime, addressing the protection of the EU’s financial interests, asset recovery and confiscation regimes (Directive EU 2024/1260), corruption and liability of legal persons, private-sector bribery, tax crime, money laundering and the interaction between criminal proceedings and fiscal recovery mechanisms.

5. Emerging forms of criminality and victim protection, including animal abuse, its links to domestic violence and organised crime, forensic investigation and the criminal law framework for the protection of animals.

6. Social media and justice, encompassing freedom of expression of judicial officers, judicial ethics, cyber-enabled offences, grooming phenomena, hate speech, evidentiary use of social media content and protection of personality rights.

7. International maritime law and marine environmental protection, covering maritime zones, marine national parks, environmental pollution, coastal erosion, search and rescue operations, border control at sea and the impact of digital surveillance technologies on fundamental rights.

8. Freedom of expression, media independence and pluralism, including constitutional and international standards, SLAPP proceedings, presumption of innocence, media influence on criminal justice and civil and criminal liability arising from press and online publications.

IV. Seminars to be organized in 2026 (continuous training for judges and prosecutors)

- 1. Rights of the accused under Greek law – Approaches through Greek case law and their interconnection with the ECtHR case law.**
- 2. Clawback and rebate mechanisms** – Resilience and sustainability of pharmaceutical care through additional tools (Regulation (EU) 2021/2282 on Health Technology Assessment, revision of European pharmaceutical legislation, forthcoming EU Regulation on critical medicines) – Marketing authorization and pricing of medicinal products.
- 3. Algorithms: Public Administration and Justice, Cybersecurity and Administrative Justice.**
- 4. Application of EU Law by the Administrative Judge:** a) The concept of primacy and direct effect of EU law,
b) Application and principles of interpretation of the Charter of Fundamental Rights of the European Union,
c) The mechanism of the preliminary ruling.
- 5. Juveniles and delinquency** – Juveniles as victims and offenders – Protection of victims and special treatment – Revictimization – Manifestations and causes of juvenile delinquent behavior – Addressing the phenomenon from the perspective of criminal law and criminal procedure.
- 6. Enforcement of judgments and the European Arrest Warrant** – Extradition and mutual legal assistance – The new Road Traffic Code and its relationship with the Criminal Code.
- 7. Migration and Asylum Law:** Procedure for examining and assessing applications for international protection by the competent national authorities – European developments – National and European case law.
- 8. Key issues arising in competition law, consumer protection law** (including unfair contract terms), and intellectual property law – Legal and jurisprudential treatment under EU law and Greek law.
- 9. Climate change/crisis:** Judicial protection of the environment and human rights – Natural and cultural environment – Urban planning and spatial planning: developments in the regulatory framework and case law at national, EU and international level.
- 10. Personal data within the meaning of the GDPR (Law No. 4624/2019)** – Case law of the ECtHR under Article 8 of the ECHR – The new digital reality – Strategic lawsuits against public participation (SLAPPs) – Transposition of Directive (EU) 2024/1069 and recent developments.
- 11. Environment protection** under EU law and Directive (EU) 2024/1203 on the protection of the environment through criminal law – The offence of cross-border drug traffic.
- 12. Public Procurement – Awarding and Execution of Public Contracts, including legal framework governing the awarding and execution of public contracts, pre-contractual legal protection, judicial and administrative review:** the role of the Hellenic Court of Audit in auditing contracts prior to their conclusion.
- 13. Sustainability of Public Finances,** including importance of sustainable public finances as a prerequisite for economic growth and societal prosperity, legal, economic, and administrative instruments to ensure fiscal stability.
- 14. Special Issues in Tax and Customs Law,** including key challenges in the application of tax and customs legislation, handling disputes and enforcement issues by **tax and customs authorities, judicial review and administrative remedies** before the Administrative Courts, with emphasis on the protection of rights and compliance with procedural and substantive law.

V. Court Staff Continuous Training (Active Court Staff – 2025)

- 1. Judicial ethics and codes of conduct for court staff,** including professional duties towards colleagues, judges and third parties, ethical and organisational culture, confidentiality of deliberations, professional secrecy, anonymisation of judicial decisions and responsible use of social media.
- 2. Personal data protection and the General Data Protection Regulation (GDPR),** covering Law No. 4624/2019, rights of data subjects, processing of special categories of personal data in judicial

functions, obligations of data controllers and processors, and technical and organisational measures for safeguarding personal data within courts.

3. European Union law and judicial cooperation, encompassing the protection of fundamental rights under the European Convention on Human Rights and the EU Charter of Fundamental Rights, economic freedoms, the European Arrest Warrant, mutual legal assistance in civil and criminal matters, the European Investigation Order, the European Judicial Network and recent EU legislative developments.

4. Rule of law, fundamental rights and European governance, including the application of the Istanbul Convention, the role of GREVIO, combating hate speech in light of ECtHR case law, and environmental governance within the European legal framework.

VI. Court Staff Continuous Training (organized to be held in 2026)

- 1. Cybersecurity and Justice – Artificial intelligence and applications in the field of justice.**
- 2. Code of conduct for court staff- judicial employees – General Data Protection Regulation – Sensitive personal data.**
- 3. European Union law issues, including: protection of fundamental rights under the European Convention on Human Rights and the Charter of Fundamental Rights of the European Union, issuance and execution of the European Arrest Warrant, mutual legal assistance in civil and criminal matters.**

B. INTERNATIONAL ACTIVITIES

I. Activities Implemented in 2025

1. In collaboration with EJTN:

“Fundamental Rights”

“Cross-border Labor Law”

“European Civil Procedure in Family Law”

“The role of court staff in Justice. Deontology and Ethics” working group meeting

Civil Sub working group meeting

Digitalization working group final meeting

2. In collaboration with European Academy of Justice (ERA FUNDING)

“Judicial training to prepare criminal justice professionals to digitalization and AI”

“Environmental Law” on October 13th – 15th, participation of ten Greek administrative judges

3. In collaboration with EUAA European Union Agency of Asylum

Workshop on March 13th – 14th 2025 (up to 20 administrative judges from asylum committees, Athens, Ministry of Migration and Asylum)

4. In collaboration with the Council of Europe Help Program.

i. HELP – EJTN course on Judges, “Upholding the Rule of Law”

ii. “Access to Justice in the Digital Environment” on November 18th – 19th 2025 (Strasbourg, France)

iii. “Artificial Intelligence and Human Rights”

iv. “Quality of Justice – the Work of the CEPEJ”

v. “Violence against Women and Domestic Violence” – on February 26th 2026 – in Brussels (Belgium)

5 In collaboration with Centre for European Constitutional Law – Themistocles and Dimitris Tsatsos Foundation

i. “European Union Charter of Fundamental Rights”, on May 28th, 25 Greek judges trained

ii. “CompEUte – Multidisciplinary judicial training for the digital single market”, on December 9th – 12th, 30 judges trained

iii. “CompEUte - Multidisciplinary judicial training for the digital single market”, on December 16th – 19th, 30 judges trained (it took place at Hellenic Competition Commission)

6. In Collaboration with European Public Law Organization (EPLO):

- i “Do we actually need a digital assistant in justice?” Topic category: Restorative Justice and Human Rights, on July 11th, 30 Greek judges and 30 students of Hellenic National School of Judiciary trained
- ii. “Do we actually need a digital assistant in justice?” Topic category: European Arrest Warrant, on July 18th, 30 Greek judges trained (it took place at the Organization)

IV. Planned International Activities for 2026

1. COLLABORATION WITH CENTRE OF INTERNATIONAL & EUROPEAN ECONOMIC LAW (CIEEL)

Funding proposal support which is about to be applied by CIEEL in the context of the invitation of the European Commission concerning: Human Rights in the context of “Invitation for Submission of Proposals to promote awareness, capacity building and implementation of European Union Charter of Fundamental Rights by Civil Society Organizations (CERV-2025-CHAR-LITI)” and, in particular, on “The EU Charter in Practice: Enhancing Legal Capacity for Lawyers, Judges and Civil Society”.

In addition, the Twinning Program in Morocco, entitled «Renforcement des capacités de l’Institut Supérieur de la Magistrature à contribuer à l’amélioration de l’efficacité du système judiciaire» (MA 22 NDICI JH 02 25).

2. COLLABORATION WITH CENTRE FOR EUROPEAN CONSTITUTIONAL LAW – THEMISTOCLES AND DIMITRIS TSATSOS FOUNDATION

Continuation of program “Competition Law Implementation in the Digital Era – CompEUte”, addressing to civil and administrative judges, with the direction and participation of Hellenic Competition Commission.

Participation at the European program with the theme:

“CHILD’S SAY: Integrating Children’s Voices in Custody Decision-Making” (in custody cases children’s best interest is a priority), with the participation of Ministry of Justice, aiming at judge training.

3. COLLABORATION WITH EUROPEAN PUBLIC LAW ORGANISATION

Participation at the European programs with the theme:

VISAR – Victim Support through Alignment of Remedies (support the victims of crime - the main emphasis on domestic violence).

CAP1 – concerning drug and human trafficking, in the context of a multi-level, criminal environment.

Enhancing Judicial Cooperation through a European Arrest Warrant (EAW)

Chatbot: focuses on the development and implementation of a Chatbot, designed to support legal professionals at the efficient exploitation of the European Arrest Warrant (EAW).

4. COLLABORATION WITH WORLD INTELLECTUAL PROPERTY ORGANISATION (WIPO)

Hosting a training seminar funded entirely by the Organization in May – June 2026 which will be addressed to 50-60 civil and administrative judges.

5. COLLABORATION WITH ECOLE NATIONALE DE LA MAGISTRATURE (FRANCE)

SHIELD – The rights of child victims of trafficking. The proposal has been submitted to the European Union and we are waiting for a response.

6. PERMANENT COLLABORATION WITH EUROPEAN JUDICIAL TRAINING NETWORK (EJTN)

a) On November 3rd – 4th 2026 – Tax law for administrative judges

b) On November 16th – 18th 2026 – Cyber Crime – Linguistic

7. EUROPEAN UNION AGENCY FOR ASYLUM (EUAA),

a) Workshop on February 12th – 13th 2026 (25 administrative judges) for the committees members

b) Workshop on October 15th – 16th 2026 (25 administrative judges)

c) A four-day seminar on the “New Pact for Migration and Asylum” on September 7th – 11th 2026.

8. EUROPEAN ACADEMY OF LAW (ERA)

Hellenic National School of the Judiciary responds to the call for interest of European Academy of Justice (ERA) and seminars on the Environment, on the European Union Charter of Fundamental Rights, on Digitalization and AI shall be organized at its facilities (Dates are yet to be determined).

9. COUNCIL OF EUROPE – HELP PROGRAMME

Hellenic National School of the Judiciary responds to the call for interest of COUNCIL OF EUROPE – HELP PROGRAMME for online seminars on the European Union Charter of Fundamental Rights, on AI and Digitalization etc.

ANNEX PILLAR II ANTICORRUPTION FRAMEWORK

1. High-level corruption cases – 2025: Data from the Bureau for the Collection and Processing of Judicial Statistics

(a) Public Prosecutors' Offices of First Instance

Offence	Number of cases concerning natural persons							
	Pending	Completed	With assets seized or provisionally frozen	Referred to trial	Completed	Not completed	Terminated (archived)	Terminated without penalty or measure
Fraud related to financing (Article 386B of the Criminal Code, Article 24(1) of Law 4689/2020)	77	16	0	32	27	153	6	3
Fraud relating to grants/subsidies (Article 386B CC)	49	3	0	4	12	2	1	1
Bribery of officials of international organisations (Article 235(5) CC, Article 22 of Law 4689/2020)	0	0	0	0	0	0	0	0
Criminal organisation (Article 187 CC, Law 4619/2019, Government Gazette A' 95)	40	19	0	17	15	32	2	0
Active bribery of judicial officials (Article 237(2) CC)	0	4	0	0	3	0	1	1

(b) Courts of First Instance

Offence	Convictions	Convictions under appeal	Acquittals
Fraud related to financing (Article 386B of the Criminal Code, Article 24(1) of Law 4689/2020)	418	2284	663
Money laundering*	171	1705	771

(c) Courts of Appeal

Offence	Convictions	Convictions subject to cassation (appeal before the Court of Cassation)	Acquittals
Fraud related to financing (Article 386B of the Criminal Code, Article 24(1) of Law 4689/2020)	2	0	2
Bribery of officials of international organisations (Article 235(5) of the Criminal Code, Article 22 of Law 4689/2020)	12	0	4

(d) Breakdown by offence severity (Misdemeanours / Felonies)

Offence	Misdemeanours (imprisonment of less than 5 years)	Felonies (custodial sentence of 5–15 years)	Total
Fraud related to financing (Article 386B of the Criminal Code, Article 24(1) of Law 4689/2020)	16	0	16
Fraud relating to grants/subsidies (Article 386B of the Criminal Code)	1	0	1
Bribery of officials of international organisations (Article 235(5) of the Criminal Code, Article 22 of Law 4689/2020)	9	0	9
Criminal organisation (Article 187 of the Criminal Code, Law 4619/2019, Government Gazette A' 95)	3	3	6

ANNEX PILLAR II ANTICORRUPTION FRAMEWORK

2. Statistical overview – Economic Crime Prosecutor’s Office

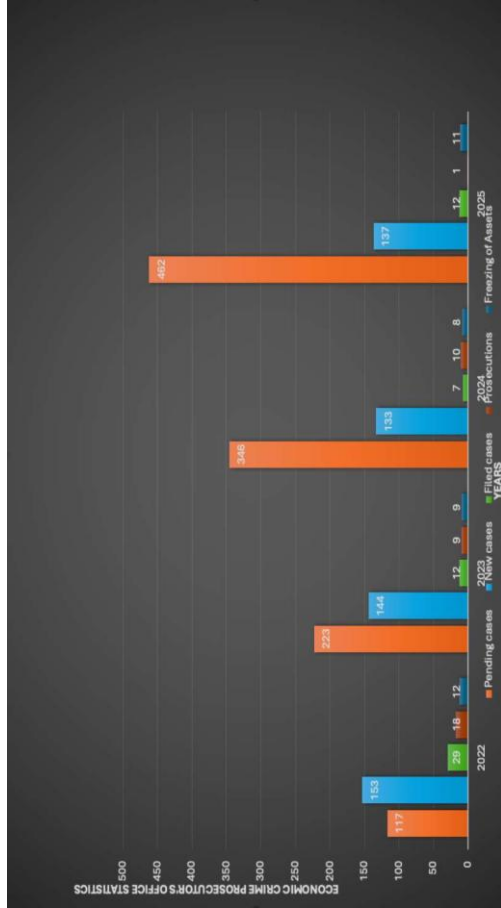
By way of illustration of the operational workload and the nature of cases handled by the Economic Crime Prosecutor’s Office, the following statistical information for the year 2025 is provided.

	# Cases
Pending cases	462
New cases	137
Filed	12
Prosecutions	1
Freezing of assets	11
Total	623

Analysis of case files by offence (2025)

Offence	# Cases
Infidelity	91
Passive bribery	27
Money Laundering	70
Other / Under investigation	37
Bribery	12
Embezzlement	33
Total	270

ANNEX PILLAR II ANTICORRUPTION FRAMEWORK



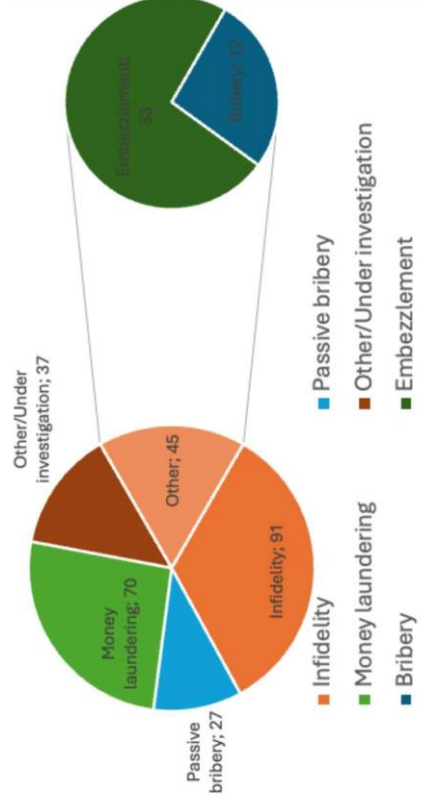
Analysis of new case files by offense (2025)

The data reflect both the overall procedural flow of cases and their distribution by type of offence and are indicative of the volume and complexity of corruption and economic crime cases dealt with at national level. They further underline the relevance of the monitoring tools and capacity-building measures described above, including the envisaged Digital Registry for the Monitoring of Corruption Cases.

The overall procedural workload of the Economic Crime Prosecutor's Office during 2025 is reflected in the number of pending and newly registered case files, as well as in the use of procedural and preventive tools, including criminal prosecutions and asset-freezing measures.

In addition to the overall workload, cases handled by the Economic Crime Prosecutor's Office in 2025 may be classified by type of offence, illustrating the predominance of complex financial crimes, including breach of trust, money laundering, embezzlement and corruption-related offences.

For completeness, Table A also includes statistical data from previous years, in order to provide a clearer picture of the overall flow of cases and their subsequent procedural handling over time. This longitudinal presentation allows for a more accurate understanding of trends relating to the accumulation, processing and progression of case files handled by the Economic Crime Prosecutor's Office.



Methodological clarifications

The data reflect both the overall procedural flow of cases and their distribution by type of offence and are indicative of the volume and complexity of corruption and economic crime cases dealt with at national level. They further underline the relevance of the monitoring tools and capacity-building measures described above, including the envisaged Digital Registry for the Monitoring of Corruption Cases.

The overall procedural workload of the Economic Crime Prosecutor's Office during 2025 is reflected in the number of pending and newly registered case files, as well as in the use of procedural and preventive tools, including criminal prosecutions and asset-freezing measures.

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For completeness, Table A also includes statistical data from previous years, in order to provide a clearer picture of the overall flow of cases and their subsequent procedural handling over time. This longitudinal presentation allows for a more accurate understanding of trends relating to the accumulation, processing and progression of case files handled by the Economic Crime Prosecutor's Office.

ANNEX JUDICIAL STATISTICS ON PRESS AND MEDIA

(a) Courts of First Instance

Number of actions brought against journalists or media outlets and their outcome, classified as follows: acceptance in whole or in part / dismissal as unfounded or inadmissible / issuance of a non-final (interlocutory) decision

Court	Actions / Decisions	
Court of First Instance of Alexandroupoli	Decisions	2
	Actions filed	4
	Appeals filed	2
	Number of actions brought against journalists or media outlets	2
Court of First Instance of Achaia – Patras seat	Actions filed	1
	Number of actions brought against journalists or media outlets	4
Court of First Instance of Veria	Actions filed	1
Court of First Instance of Boeotia – Livadeia seat	Decisions	3
	Actions filed	2
Court of First Instance of Volos	Actions filed	2
	Number of actions brought against journalists or media outlets	1
Court of First Instance of Heraklion	Decisions	1
	Actions filed	1
	Decisions	2
Court of First Instance of Thessaloniki	Actions filed	2
	Number of actions brought against journalists or media outlets	2
Court of First Instance of Ioannina	Decisions	4
	Actions filed	2
Court of First Instance of Kavala	Decisions	2
	Actions filed	1
	Appeals filed	4
Court of First Instance of Katerini	Actions filed	1
Court of First Instance of Kilikis	Decisions	3
	Appeals filed	2
Court of First Instance of Kos	Decisions	2
Court of First Instance of Larisa	Decisions	1
	Actions filed	1
	Appeals filed	1

Court	Actions / Decisions	
Court of First Instance of Lamia	Decisions	1
	Actions filed	2
Court of First Instance of Mytilene	Decisions	5
	Actions filed	1
Court of First Instance of Nafplio	Actions filed	1
Court of First Instance of Xanthi	Decisions	1
Court of First Instance of Piraeus	Decisions	16
	Actions filed	15
	Appeals filed	8
	Number of actions brought against journalists or media outlets	6
Court of First Instance of Preveza	Decisions	1
	Actions filed	4
Court of First Instance of Serres	Decisions	2
	Actions filed	2
Court of First Instance of Chalkida	Decisions	4
	Actions filed	11
	Number of actions brought against journalists or media outlets	5
Court of First Instance of Chania	Decisions	2
Court of First Instance of Athens	Decisions	283
	Actions filed	193
	Appeals filed	0
	Number of actions brought against journalists or media outlets	193

ANNEX JUDICIAL STATISTICS ON PRESS AND MEDIA

In case of acceptance: the initial amount claimed in the action and the final amount awarded

Outcome	Year	Year of filing	Amount claimed for moral damages	Legal remedy (appeal) lodged	Amount awarded
Acceptance in whole or in part	2025	2024	30.000 €	No	10.000 €
Accepted	2025	2020	100.000 €	No	3.000 €
Accepted	2025	2023	52.000 €	No	7.000 €
Acceptance in whole or in part	2025	2025	3.000 €	No	2.000 €
	2025	2024	64.341 €	No	3.000 €
Acceptance in whole or in part	2025	2022	10.000 €	No	1.500 €
	2025	2024	30.000 €	No	1.000 €
Acceptance in whole or in part	2025	2024	75.000 €	Yes	15.000 €
	2025	2024	20.000 €	No	5.000 €
Acceptance in whole or in part	2025	2024	100.000 €	No	10.000 €
	2025	2024	70.000 €	No	10.000 €
Acceptance in whole or in part	2025	2024	30.000 €	No	2.500 €
	2025	2024	29.000 €	No	3.000 €

Entity	Outcome	Year	Year of filing	Amount claimed for moral damages	Legal remedy (appeal) lodged	Amount awarded
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	50.000 €	No	3.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	40.000 €	No	3.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	40.000 €	No	3.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €

Entity	
Court of First Instance of Alexandroupoli	
Court of First Instance of Ioannina	
Court of First Instance of Preveza	
Court of First Instance of Serres	
Court of First Instance of Chania	
Court of First Instance of Athens	
Court of First Instance of Athens	
Court of First Instance of Athens	
Court of First Instance of Athens	
Court of First Instance of Athens	
Court of First Instance of Athens	

Entity	Outcome	Year	Year of filing	Amount claimed for moral damages	Legal remedy (appeal) lodged	Amount awarded
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	Yes	1.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	50.000 €	Yes	20.00€
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	50.000 €	Yes	20.00€
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	10.000 €	No	10.00€
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	30.000 €	No	9.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.500 €	No	1.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	50.000 €	Yes	5.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	60.000 €	No	9.500 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	100.000 €	Yes	15.000 €

Acceptance in whole or in part	No	
Acceptance in whole or in part	No	€
Acceptance in whole or in part	No	2.000 €
Acceptance in whole or in part	No	
Acceptance in whole or in part	No	2.000 €
Acceptance in whole or in part	No	€
Acceptance in whole or in part	No	2.000 €
Acceptance in whole or in part	No	
Acceptance in whole or in part	No	
Acceptance in whole or in part	No	2.000 €
Acceptance in whole or in part	No	€

ANNEX JUDICIAL STATISTICS ON PRESS AND MEDIA

In case of acceptance: the initial amount claimed in the action and the final amount awarded

Entity	Outcome	Year	Year of filing	Amount claimed for	Legal remedy (appeal) lodged	Amount awarded
Court of First Instance of Athens		2025	2024	20.000 €		2.000 €
Court of First Instance of Athens		2025	2024	20.000 €		2.000
Court of First Instance of Athens		2025	2024	20.000 €		
Court of First Instance of Athens		2025	2024	20.000 €		2.000 €
Court of First Instance of Athens		2025	2024	20.000 €		
Court of First Instance of Athens		2025	2024	20.000 €		2.000
Court of First Instance of Athens		2025	2024	20.000 €		
Court of First Instance of Athens		2025	2024	20.000 €		2.000 €
Court of First Instance of Athens		2025	2024	20.000 €		2.000 €
Court of First Instance of Athens		2025	2024	20.000 €		
Court of First Instance of Athens		2025	2024	20.000 €		2.000 €
Court of First Instance of Athens		2025	2024	20.000 €		2.000 €
Court of First Instance of Athens		2025	2024	20.000 €		
Court of First Instance of Athens		2025	2024	20.000 €		2.000

ANNEX JUDICIAL STATISTICS ON PRESS AND MEDIA

In case of acceptance: the initial amount claimed in the action and the final amount awarded

Entity	Outcome	Year	Year of filing	Amount claimed for moral damages	Legal remedy (appeal) lodged	Amount awarded
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	No	2.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	20.000 €	No	2.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	80.000 €	Yes	8.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2022	100.000 €	Yes	8.000 €
Court of First Instance of Athens		2025	2023	40.000 €	No	10.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2023	30.000 €	No	4.000 €
Court of First Instance of Athens		2025	2024	40.000 €	No	2.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2023	100.000 €	Yes	5.000 €
Court of First Instance of Athens		2025	2023	150.000 €	Yes	3.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2022	100.000 €	Yes	4.000 €
Court of First Instance of Athens		2025	2020	20.000 €	Yes	5.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2023	1.500 €	Yes	500 €

Entity	Outcome	Year	Year of filing	Amount claimed for moral damages	Legal remedy (appeal) lodged	Amount awarded
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	30.000 €	Yes	800 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2022	50.000 €	Yes	0 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2022	20.000 €	No	5.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2022	200.000 €	No	5.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2023	5.000 €	No	3.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	100.000 €	No	3.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	100.000 €	Yes	7.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2022	100.000 €	No	3.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2021	15.000 €	Yes	3.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2021	300.000 €	No	0 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2022	100.000 €	Yes	8.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2023	30.000 €	No	5.000 €

Entity	Outcome	Year	Year of filing	Amount claimed for moral damages	Legal remedy (appeal) lodged	Amount awarded
Court of First Instance of Athens	Acceptance in whole or in part	2025	2022	100.000 €	No	3.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	80.000 €	No	10.000 €
Court of First Instance of Athens		2025	2024	120.000 €	No	8.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	120.000 €	Yes	2.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	140.000 €	No	11.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2022	200.000 €	No	8.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	30.000 €	No	5.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	45.000 €	Yes	7.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	140.000 €	No	10.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2024	980.000 €	No	20.000 €
Court of First Instance of Athens	Acceptance in whole or in part	2025	2023	71.000 €	No	7.000 €

ANNEX JUDICIAL STATISTICS ON PRESS AND MEDIA

(b) Courts of Appeal

- Number of appellate decisions concerning appeals brought against journalists or media outlets, classified as follows: acceptance in whole or in part / dismissal of the appeal / issuance of a non-final (interlocutory) decision

Court	Actions / Decisions			
Court of Appeal of the Aegean	Decisions			2
	Actions filed			0
	Appeals filed			2
	Number of actions brought against journalists or media outlets			0
Court of Appeal of Western Macedonia	Decisions			0
	Actions filed			0
	Appeals filed			2
	Number of actions brought against journalists or media outlets			0
Court of Appeal of The Dodecanese	Decisions			3
	Actions filed			0
	Appeals filed			0
	Number of actions brought against journalists or media outlets			0
Court of Appeal of Corfu	Decisions			1
	Actions filed			0
	Appeals filed			0
	Number of actions brought against journalists or media outlets			0
Court of Appeal of Lamia	Decisions			1
	Actions filed			1
	Appeals filed			1
	Number of actions brought against journalists or media outlets			1
Court of Appeal of Piraeus	Decisions			5
	Actions filed			0
	Appeals filed			10
	Number of actions brought against journalists or media outlets			1

In case of acceptance: the initial amount claimed in the action and the final amount awarded

Court	Outcome	Amount claimed for moral damages	Amount awarded
Court of Appeal of North Aegean	Acceptance in whole or in part	50.000 €	0 €
Court of Appeal of Athens	Acceptance in whole or in part	200.000 €	20.000 €
Court of Appeal of Athens	Acceptance in whole or in part	30.000 €	1.000 €
Court of Appeal of Athens	Acceptance in whole or in part	3.000 €	2.000 €
Court of Appeal of Athens	Acceptance in whole or in part	60.000 €	5.000 €
Court of Appeal of Athens	Acceptance in whole or in part	15.000 €	15.000 €
Court of Appeal of Athens	Acceptance in whole or in part	5.000 €	1.000 €
Court of Appeal of Athens	Acceptance in whole or in part	300.000 €	1.000 €
Court of Appeal of Athens	Acceptance in whole or in part	50.000 €	3.000 €
Court of Appeal of Athens	Acceptance in whole or in part	5.000 €	3.000 €
Court of Appeal of Athens	Acceptance in whole or in part	200.000 €	16.000 €
Court of Appeal of Athens	Acceptance in whole or in part	30.000 €	4.000 €
Court of Appeal of Athens	Acceptance in whole or in part	100.000 €	5.000 €
Court of Appeal of Athens	Acceptance in whole or in part	50.000 €	6.000 €

