European Rule of Law Mechanism: input from Member States

2026 Rule of Law Report

The written input from Member States is a key source of information for the annual Rule of Law Report, as clearly set out in the Report's methodology. As every year, the Commission would hereby like to invite the national contact points to provide their input to the 2026 Rule of Law Report. Based on this input, further targeted questions may follow, as it was the case in previous years, to ensure that the Commission has all relevant information from Member States for the preparation of the 2026 Rule of Law Report. Such further targeted input will be sought in particular in the context of country visits or bilateral contacts, as well as during the consultation on the draft country chapters prior to the Report's adoption.

The 2026 Rule of Law Report will continue to assess rule of law related developments under the existing four pillars and will follow-up on the implementation of the recommendations to Member States that were issued as part of the 2025 Rule of Law Report. To facilitate the preparation of input by Member States, this year's questionnaire has been adapted. Member States are asked to provide information about:

(1) developments and measures taken in relation to the recommendations in the 2025 report,

(2) developments that are relevant for updating and following up on the assessment of the topics covered in the 2025 country chapter, as well as any other new developments related to the rule of law.

The input under these points should cover any developments since the adoption of the 2025 Rule of Law Report. The annex to this request for input sets out a checklist/guidelines on relevant topics falling within the Report's scope to help Member States prepare their input, building on experience from previous years.

Nature of the contribution

The input should preferably be in English and not exceed 30 pages. Relevant legislation or other documents may be referenced with a link (no need to provide the full text). The contributions will be published on the Commission's website upon explicit consent of the Member States. In order to avoid duplication and excessive administrative burden, please include where applicable explicit references to any relevant contribution already provided by your Member State in a different context (including under Council of Europe, OECD, OSCE and UN bodies or procedures) or to the previous Rule of Law Reports. Contributions should focus on significant developments since the last Rule of Law Report both as regards the legal framework and its implementation in practice.

Type of information to be included

A) Legislative developments

- Newly adopted legislation
- legislative drafts currently discussed in Parliament
- legislative plans envisaged by the Government

B) Policy developments

- Implementation and enforcement of legislation

- evaluations, impact assessment, surveys
- white papers/strategies/actions plans/consultation processes
- follow-up to reports/recommendations of Council of Europe bodies or other international organisations
- important administrative measures
- generalised practices

C) Developments related to the judiciary / independent authorities

- important case law by national courts
- important decision/opinions from independent bodies/authorities
- state of play on terms, nominations and expired mandates for high-level positions (e.g. Supreme Court, Constitutional Court, Council for the Judiciary, Prosecutor General, heads of independent authorities included in the scope of the request for input[1])

D) Any other relevant developments

- National authorities are free to add any further information, which they deem relevant; however, this should be short and to the point.

Please also indicate whether the developments reported are linked to the implementation of reforms and investments under the RRP, where applicable.

Please send us your contribution by **23 January 2026** to the following email address: rule-of-law-network@ec.europa.eu. In case you would have any questions or requests for clarifications, please do not hesitate to contact the Commission at the same email address.

Template for input

This template for input indicates the type of contribution sought from Member States for the 2026 Rule of Law Report and provides a suggested format of reply. However, Member States are free to decide on the precise format of their contribution, as long as the key points are covered.

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

In the below box, please describe relevant developments and the measures taken with a view to implement the recommendations, following the order of the recommendations as they were addressed to your Member State in the 2025 Rule of Law Report.

[1] Such as: media regulatory authorities and bodies, national human rights institutions, equality bodies, ombudsman institutions, supreme audit institutions and, where they exist, transparency authorities.

On the 2025 Recommendation *"Further advance with the ongoing reform of the Law Office and the establishment of the Office of the Public Prosecutor General and establish an effective review of decisions not to prosecute or to discontinue proceedings, taking into account European standards on independence and autonomy of the prosecution":*

- ***LAW OFFICE***

Separation of roles

The bills for the reform of the Law Office (separation of roles of the Attorney General) are pending before the House of Representatives. The Law Office has participated in the first discussion that took place on 10/9/25 in the competent Parliamentary Committee.
The Attorney General explained to the members of the Parliamentary Committee his reservations on the constitutionality of the amendments which were in line *inter alia* with the reservations expressed by the majority of the members of the Independent ad hoc Committee of Legal Experts that prepared a report on the matter. The Attorney General's opinion as well as the opinions of all seven members of the said Committee are publicly available on the website of the Law Office.
Concerns about the constitutionality of the aforementioned bill were also expressed by the President of the Cyprus Bar Association during the discussion in the competent Parliamentary Committee.

Review of the Decisions of the Attorney General

On 2/12/25 the Ministry of Justice and Public Order submitted to the House of Representatives the bill for the judicial review of the decisions of the General Public Prosecutor which builds on the main draft bill providing for the separation of roles of the Attorney General by establishing the position of the General Public Prosecutor. The Law Office had conducted the legal vetting of this draft legislation based on the extensive discussions held between the Ministry of Justice and Public Order, the Law Office and the Supreme Court.
The first discussion of this bill took place on 14/1/26 in the competent Parliamentary Committee.
According to the aforementioned Bill, the following decisions of the General Public Prosecutor are subject to judicial review:

(i) decisions not to institute criminal prosecution against a person for an offence; and
(ii) decisions to suspend criminal proceedings on charges against a person before the Assize Court.

- The Supreme Court is designated as the competent court for final and conclusive review of the final decisions of the General Public Prosecutor.
- A decision of the General Public Prosecutor may be annulled on three grounds:

(i) bad faith on the part of the General Public Prosecutor;
(ii) failure, without good reason, to comply with the established policy of the Office of the General Public Prosecutor of the Republic; and
(iii) failure to comply with an annulment judgment of the Supreme Court at the review stage.

- Locus standi to apply for judicial review is granted to:

  (i) a natural or legal person who suffered harm or damage directly caused by the offence for which prosecution was not instituted or was suspended, who is recognized as a victim; or
  (ii) a person who is a relative of the victim, where the victim has died as a result of the offence.
  Regarding decisions not to institute criminal prosecution, victims can apply for judicial review provided that they have complied with the internal (hierarchical) review procedure first which is also being introduced.

In addition, it should be noted that a Member of Parliament (MP) has also submitted a draft bill on the reform of the Law Office which was also discussed on 14/1/26. The draft bill submitted by the MP has a limited scope. It provides for a fixed period of the years of tenure to the position of the Attorney General and the Deputy Attorney General (8 years non-renewable) and introduces the possibility of review of the Attorney General's decisions by a special Committee.

➢ ***CYPRUS BAR ASSOCIATION***

The Government of the Republic of Cyprus submitted two bills in 2025 concerning the reform of the Law Office. The bills are currently under examination by the competent parliamentary committee, as the positions of the stakeholders regarding the drafted bills vary. The purpose of the bills is to transfer the criminal-law related powers, which currently lie with the Attorney General, to the Public Prosecutor.

A bill has recently been approved by the Council of Ministers concerning the reviewability of decisions to suspend criminal prosecutions taken by the Attorney General and submitted to the Parliament. If adopted, this procedure will ensure the review of decisions taken by the Attorney General (or by the Public Prosecutor should the relevant amendments be approved) to suspend criminal prosecutions.

➢ ***MINISTRY OF JUSTICE AND PUBLIC ORDER***

Reform of the Law Office of the Republic:

(1) As the information given the previous year, the Ministry of Justice and Public Order has prepared relevant bills aiming at strengthening the independence of the prosecutorial role that currently forms an integral part of the Legal Service of the Republic, and also the ability of Legal Service Officers and Public Prosecutors to perform their duties with greater autonomy, guided by the safeguards required under the rule of law.

In particular, the proposed arrangements for the modernization of the Legal Service include:
- Separation of the dual roles of the Attorney General and the Deputy Attorney General. The Attorney General will remain the legal advisor of the state and head of the Legal Service, together with the Deputy Attorney General.
- Establishment of an eight-year term for the offices of the Attorney General and the

Deputy Attorney General, without the right to reappointment.
- Creation of a new institution, the Public Prosecutor General and the Deputy Public Prosecutor General, who will exercise all the existing powers of the Attorney General in his capacity as a Public Prosecutor. The provisions regarding qualifications, term of office, dismissal, and remuneration will correspond to those of the Attorney General and Deputy Attorney General (equivalent to those of Supreme Court Judges, except for the term of office).
- Appointment of all the above officials by the President of the Republic.
- Exercise of the powers of the Public Prosecutor General based on predefined criteria and a form of review of his decisions.
- Establishment and operation of the Office of the Public Prosecutor General through a specific legislative bill.
- Provisions for the autonomy of the Legal Service of the Republic and its officers General through a specific legislative bill.
- Entry into force of the legislation on 1.12.2027, with the exception of the provision establishing an eight-year term of office, which shall enter into force upon the publication of the amending Constitutional Law in the Official Gazette of the Republic, as well as the provisions concerning the establishment of the Office of the Republic's Public Prosecutor General and its readiness to operate, which shall enter into force from the date of publication in the Official Gazette of the Republic of a Notification of the Council of Ministers, which in any event shall follow 1.12.2027.

The relevant bills are pending before the Parliamentary Committee on Legal Affairs, Justice, and Public Order, and have been discussed once before the Committee, on 10th of September 2025.

(2) Further to the above, the Ministry of Justice and Public Order has prepared a bill introducing the review of the General Public Prosecutor's decisions.

More specifically, the bill provides for the review, by the Supreme Court, of the following two (2) categories of decisions of the Public Prosecutor General:
(a) decisions not to institute criminal proceedings against a person for an offence; and
(b) decisions to suspend criminal proceedings against an accused person before the Assize Court.

The exact procedure shall be the following:
(a) a decision by the Public Prosecutor General not to institute criminal proceedings or to suspend criminal proceedings before the Assize Court;
(b) an internal review procedure of the decision of the Public Prosecutor General (in cases of a decision not to institute criminal proceedings), within the framework of which the case is re-examined ab initio. The decision may be revised at this stage.
(c) an application to the Supreme Court for the annulment of the decision of the Public Prosecutor General (either the decision not to institute criminal proceedings, or the decision to suspend proceedings before the Assize Court);
(d) where the Supreme Court allows the application and annuls the decision of the Public Prosecutor General, the latter shall be obliged to reconsider his decision within a reasonable period of time.

The grounds justifying review are the following:
(a) where the existence of bad faith on the part of the Public Prosecutor General is established;
(b) where non-compliance, without good cause, with the established policy of the Office of the Public Prosecutor General is established; and
(c) where non-compliance with the binding effect of an annulling judgment of the Supreme Court is established.

The persons entitled to submit an application to the Supreme Court are: the natural or legal person who has suffered harm or damage by the offence in respect of which criminal proceedings were not instituted or were suspended, and who is recognised as a victim for the purposes of the law; or the person who is a first-degree relative of the victim, where the victim has died as a result of the commission of the offence.

The said bill was submitted to the House of Representatives in December 2025, and was discussed for the first time on 14th of January 2026 at the Parliamentary Committee on Legal Affairs, Justice, and Public Order.

It should be noted that the Attorney General of the Republic stated that he maintains serious reservations as to the constitutionality of the proposed reforms concerning the separation of the powers of the Attorney General of the Republic, and, by extension, of all legislation relating to the Public Prosecutor General of the Republic.

On the 2025 Recommendation *"Advance with the legislative reforms to strengthen the Independent Authority against Corruption and continue efforts to ensure it has the human and technical resources to effectively perform its tasks":*

➢ ***INDEPENDENT AUTHORITY AGAINST CORRUPTION***

The Independent Authority Against Corruption (IAAC) is currently operational with a total workforce of 22 personnel[2], including the 4 Members of the Authority and the Commissioner for Transparency. The seventeen (17) members of the staff, are thirteen (13) on a contract basis and four (4) are permanent civil servants.
The staff includes an economic affairs officer on a secondment basis and the legal and administrative core consists of six legal officers and three administrative officers, all employed on a contract basis.
The support team is composed of five secretarial officers—three (3) on contract and two (2) serving as permanent civil servants—as well as two (2) ushers, one of whom is a contract employee and the other a permanent civil servant.
The Independent Authority Against Corruption (IAAC) is currently navigating a pivotal transition from a temporary, contract-based workforce, to a structured, permanent civil service model. This shift is not merely administrative; it is a legal necessity to safeguard the Authority's independence and operational continuity. The specific legislative and procedural milestones supporting this transition are detailed in the "Legal

Developments" section below.

Technical Resources Developments

The Department of Information Technology Services (DITS) provides essential technical support to the Authority, ensuring that its digital and physical infrastructure meets modern standards.

Hardware and Infrastructure

The Authority is fully equipped with the necessary hardware to facilitate its daily operations, including a suite of computers, laptops, printers, scanners, and high-capacity shredders for the secure disposal of sensitive documents. To further enhance its operational integrity, the Authority has completed the construction of a High-Security Strong Room designed for the secure storage of sensitive evidence and highly confidential investigative documents.

The construction and technical specifications of the room adhere strictly to the rigorous security protocols mandated by the National Security Authority (NSA) of the Republic of Cyprus. These standards ensure that the facility provides a fortified environment capable of withstanding both physical and technical threats.

Remote Investigation Capabilities

A significant advancement was the integration of high-end video conferencing equipment, provided on a loan basis by DITS. This technology has revolutionized the Authority's investigative reach by:

- Facilitating International Cooperation: Allowing for secure, high-definition interviews with parties located outside the country.
- Ensuring Efficiency: Enabling "distanced" interviews that reduce travel costs and expedite the testimony-gathering phase of ongoing investigations.

Implementation of Advanced Technology (AI & Translation)

In its commitment to modernizing investigations, particularly within its largest ongoing case "Mafia State", the Authority has deployed specialized digital tools:

Artificial Intelligence (AI): Inspection officers utilize AI-driven analytics to perform cross-document context comparisons. This allows the team to identify inconsistencies, patterns, and hidden links across vast volumes of submitted evidence that would be impossible to detect manually.

Translation Software: To manage the multilingual nature of financial and legal documents, investigators use advanced translation tools, ensuring that language barriers do not hinder the progress or accuracy of an investigation.

Digitization of the Lobbying Registry

The digitalization of the Lobbying Registry represents a critical milestone in the Authority's mission to modernize oversight and ensure public accountability. By moving away from manual record-keeping, the IAAC is establishing a sophisticated infrastructure to track the influence of interest groups on public decision-making.

The project, scheduled for full implementation by 2027[3], aims to replace paper-based submissions with a robust, integrated platform that serves three primary functions:

- Automated Registration: A user-friendly portal where lobbyists and interest groups can register their profiles, as mandated by the Law on the Transparency in Public Decision-Making Processes (20(I)/2022).
- Activity Reporting: An electronic interface for the submission of reports detailing contacts made with public officials, the subjects discussed, and the interests represented.
- Public Search Interface: Enhanced Transparency for Civil Society.

The project is being spearheaded by an external IT company/ developer selected through a competitive tender procedure.
By digitalizing these procedures, the IAAC is significantly reducing the administrative burden on its small staff while maximizing its investigative reach. This move aligns with international best practices (such as those recommended by GRECO and the OECD) to move toward "Open Government" and proactive transparency.

Website

Regarding, the website of the Authority all the core components of the website, with a particular focus on lobbying guidelines and documentation has been translated in English language. We will intensify our efforts to expand the availability of English-language content across the platform to ensure broader accessibility.

Legal Development

In a landmark move, the Council of Ministers approved a significant amendment bill in July 2025 entitled "The Establishment and Operation of the Independent Authority Against Corruption (Amending) Law of 2025." This amendment[4] represents a fundamental shift in the Authority's operational framework, specifically designed to strengthen its administrative and institutional autonomy.
The Authority is now empowered to actively participate in recruitment of its own human resources. This ensures that the selection of personnel is conducted with the specialized scrutiny required for anti-corruption work. With the organizational chart already approved by the Department of Public Administration and Personnel, our current focus is the finalization of the Schemes of Service. Completion of these Schemes will trigger a series of mandatory regulatory and legal steps leading to their submission to the House of Representatives. Upon ratification, the Authority will immediately commence recruitment procedures in strict accordance with the established legal framework.
Finally, these legislative developments serve a broader purpose: they bring the Republic of Cyprus into compliance with GRECO recommendations. By strengthening the Authority's operational independence, Cyprus aligns its anti-corruption infrastructure with the standards set by the Council of Europe, reinforcing the nation's commitment to the rule of law.

Financial Developments

The budget of the Authority is integrated into the State Budget of the Republic, specifically under the dedicated chapter "Budget of the Independent Authority Against Corruption," as mandated by the Law of 2022 (19(I)/2022).
As a state-funded institution established to prevent and combat corruption, all

operational expenditures—including the remuneration of the Board Members and the salaries of the permanent and contractual staff—are covered through this specialized budgetary provision. This financial structure ensures that the Authority's activities are fully supported by the State's fiscal framework while operating within the legal parameters of its founding statute. The budget of the Authority for the fiscal year 2026 has been formally approved by the House of Representatives (17 of December 2025). Notably, the approval process was completed without any objections or contentious issues being raised, and the requested funding was granted in full without any budget cuts.
This seamless approval reflects the broad parliamentary consensus regarding the Authority's mission and ensures that its operational and investigative capabilities remain unhindered for the upcoming year.

- ***CYPRUS BAR ASSOCIATION CONTRIBUTION***

In 2025, the Amendment Bill to the Law on the Independent Authority against Corruption was submitted to the Legal Affairs Committee. The purpose of this bill, which has been approved, is to amend the Law on the Establishment and Operation of the Independent Authority against Corruption to provide for the following:

1. The Advisory Committee responsible for selecting the staff of the Office of the Independent Authority against Corruption (the Authority) shall consist of the Commissioner for Transparency and the members of the Authority and shall act in accordance with the powers and responsibilities provided for advisory committees under the Civil Service Law.

2. The obligation of maintaining confidentiality or secrecy, even after the termination of service of the Authority's employees.

3. The Authority's ability to enter into service lease contracts or procurement of services agreements.

4. The possibility of temporary staffing through secondments of public or other state officials until the full staffing of the Authority is completed.

On the 2025 Recommendation *"Adopt legislation to ensure fair and transparent distribution of advertising expenditure by the state and state-owned companies".*

- ***MINISTRY OF INTERIOR***

In addition to the existing practice described in our previous reporting period, the relevant provisions concerning **Article 25 of Regulation (EU) 2024/1083 (European Media Freedom Act – EMFA)** have been adequately incorporated into the draft legislation currently pending adoption.
The draft legislation has recently been approved by the Council of Ministers and has been submitted to the House of Representatives for examination and adoption.
The draft law provides that state advertising is to be conducted through the Press and

Information Office (PIO). The PIO will be responsible for allocating funds to media service providers and online platform providers for the promotion of public information campaigns it undertakes, either directly or indirectly through specialised intermediaries. Such allocation will be carried out in accordance with procedures, guidelines, and criteria established and published by the PIO on its official website. The draft legislation further requires that the total annual expenditure on government advertising, as well as on supply or service contracts concluded with media service providers or online platform providers, be distributed across a broad range of media service providers represented in the market.
Moreover, under the provisions of the draft EMFA-implementing legislation, the Radio Television and Digital Services Authority (RTDSA) is expected to be entrusted with responsibility for monitoring the allocation of state advertising expenditure to media service providers and online platform providers, and for issuing an annual report on this matter.

On the 2025 Recommendation *"Strengthen the rules and mechanisms to enhance the independent governance of public service media taking into account European standards on public service media".*

Following its designation as national Digital Services Coordinator under the Digital Services Act, pursuant to a Decision of the Council of Ministers dated 2 February 2024, the Radio Television and Digital Services Authority (RTDSA) has been subject to a legislative amendment (Law 123(I)/2025). Under this amendment, it is expressly provided that:
"The Authority shall have sufficient financial and human resources and enforcement powers, to effectively carry out its tasks and to contribute to the work of European institutions and bodies, including the Digital Services Council and the European Board for Media Services (EBMS/ERGA), and for this purpose, the Authority shall have its own annual budget of income and expenditure, which shall be made public."
In parallel, the provisions of Article 7(3) of Regulation (EU) 2024/1083 (European Media Freedom Act – EMFA)— which mandate that national regulatory authorities possess adequate financial and human resources and enforcement powers — have been taken into account. Draft legislation formally assigning responsibility for the implementation of the EMFA to RTDSA has been prepared and is currently pending adoption.
In addition to its role as national coordinator under the DSA, and in anticipation of its responsibilities under the EMFA and the forthcoming Regulation on political advertising (also to be assigned to RTDSA), a state grant of €200,000 has been included in RTDSA's 2026 annual budget to partially cover its initial staffing and technical resource needs. Furthermore, an amount of €175,000 was allocated in 2025 from the budget of the Ministry of Energy, Commerce and Industry to address immediate operational requirements.
The possibility of state funding is already provided for under RTDSA's legislation (Article 38 of Law 7(I)/1998). Funding needs will continue to be assessed on a systematic basis, and appropriate financial support will be provided accordingly.
With regard to the appointment and dismissal procedures of heads of management and members of the governing boards of public service media, the relevant safeguards have

been duly incorporated into the draft legislation for the implementation of the European Media Freedom Act (EMFA) currently pending adoption, as noted above. At a subsequent stage, the existing sector-specific legislation governing public service media will also be amended accordingly, in order to ensure full alignment of the legal framework.
As concerns the safeguarding of the plurality of information and opinions, the draft EMFA-implementing legislation establishes a clear procedure for the assessment of media market concentrations, in line with Article 22 EMFA. The Radio Television and Digital Services Authority (RTDSA) is expressly designated as the competent authority in this process, with responsibility for assessing media market concentrations with a view to protecting media pluralism and safeguarding editorial independence.

Furthermore, as part of the draft EMFA-implementing legislation, the Media Regulatory Authority (RTDSA) will be directly involved in the assessment of media concentrations and will have the competency to approve a concentration where it involves media service providers. Additionally, as per the said legislation, and more specifically article 6, the regulatory authority will develop a database of all media ownership information, including beneficial owners.

On the 2025 Recommendation *"Ensure that the ongoing reform of the Audit Office introduces safeguards in the appointment procedure to enhance the independence of the Auditor General and the Deputy Auditor General"*:

- ***MINISTRY OF JUSTICE AND PUBLIC ORDER***

Reform of the Audit Office of the Republic:

The final bills submitted to the House of Representatives by the Ministry of Justice and Public Order, aiming at institutionalizing by law and modernizing the Audit Service, provide the following:

a) Provision for the financial autonomy of the Audit Office, through the preparation of its own annual budget without the involvement of the Executive Power.

b) The appointment of the Auditor General and the Deputy Auditor General by the President of the Republic and the establishment of an eight-year term for the offices of Auditor General and the Deputy Auditor General, without the right to reappointment.

c) Determination of the qualifications of the Auditor General and the Deputy Auditor General (citizens of the Republic, competent and suitable persons of the highest ethical standard and of recognized academic qualifications or experience in the financial, accounting, auditing or another related field).

d) The establishment of the Audit Council, comprising of three (3) members. The appointment of the members of the Audit Council by the Council of Ministers, following a recommendation by the Advisory Council provided for in the law, which, after taking into account the views of the Auditor General, submits to the Council of Ministers a list of five (5) persons suitable for appointment, accompanied by an evaluation report for each candidate, setting out its reasoned opinion. The term of office of the members shall be five (5) years, without the right of reappointment. The remuneration and other terms of service of the members shall be determined in their instruments of appointment for the entire five-year term. The members shall perform their duties on a full-time and exclusive basis and shall not undertake any other work, profession or employment, whether with or without remuneration.

The bill amending the Constitution, providing as the points a) to c), above, was passed into law and published in the Official Gazette of the Republic on 7.11.2025. The point d) relating to the establishment of the Audit Council remains pending. The Parliamentary Committee on Legal Affairs, Justice, and Public Order currently awaits the views of the Auditor General regarding the multi-member board model, which was supported by most attendees during the session of the Parliamentary Committee.

- ***AUDIT OFFICE OF THE REPUBLIC:***

A draft bill, prepared by the Ministry of Justice and Public Order, was put before the Parliament, for changing the current single Auditor General model of the Supreme Audit Institution. The draft included also other provisions regarding the term of office and qualifications of the Auditor General and the Deputy Auditor General, as well as the financial independence of the Audit Office.

The collegial model proposed in the draft was a hybrid not encountered anywhere else in the world, as it provided for the establishment of another body, the Audit Council, which would review all audit reports prepared by the Audit Office, which would express the opinion of the Auditor General and issue a separate opinion thereon. During the discussions of the draft in front of the relevant Parliamentary Committee, the Auditor General expressed his disagreement with the proposed draft bill, highlighting the serious threats to the functioning of the Audit Office and its independence, stressing that he is not against the transition to a collegial model, provided this would be in line with Constitutional Provisions and current international practices.

It was eventually decided to postpone the discussion of this provision of the draft bill and the following changes, which our Office considers as positive developments, were enacted:

- Term of Office for the Auditor General and the Deputy Auditor General is set at 8 years or until the age of retirement (68 years), whichever comes first.
- Qualifications for the appointment of the above-mentioned Officials are set.
- The annual budget of the Audit Office will be presented directly to the Parliament for approval and will no longer form part of the overall state budget. The ceiling regarding the maximum amount of expenditure of the budget will continue to be set by the Ministry of Finance.

On all the 2025 the Recommendations:

- ***HOUSE OF REPRESENTATIVES***

a) **Ongoing reform of the Law Office and the establishment of the Public Prosecutor General and establishment of an effective review of decisions not to prosecute or to discontinue proceedings.**

   - A legislative package concerning the reform of the Law Office, aiming to provide a clearer distinction between the advisory and the prosecutorial functions of the Attorney General of the Republic of Cyprus, which was submitted by the executive power on 10 July 2025, is still under examination before the House Standing Committee on Legal Affairs, Justice and Pubic Order.

- A legislative bill submitted by the executive power on the 4th December of 2025, concerning the measures to establish an effective review of the decisions of the Attorney General not to prosecute or to discontinue proceedings has been debated once on 14 January 2026 before the same above competent House Standing Committee.

b) Reform of the Audit Office

A legislative bill on the reform of the Audit Office which was submitted by the executive power on the 10 July 2025 was passed into law on the 23rd October 2025. It is noted that only the provisions concerning the appointment procedure, ie the duration of the term of office and the qualifications for appointment of the Auditor General and the Deputy Auditor General were voted upon, whereas no progress was made regarding the provisions on the transformation of the Audit Office into an Audit Council.

c) Independent Authority against Corruption

On the 30 October 2025 the plenary of the House of Representatives voted in favor of an amendment of the Law on The Establishment and Operation of the Independent Authority against Corruption [N. 19(I)/2022] with regards the human resources recruitment procedure.

d) Fair and transparent distribution of advertising expenditure by the state and state-owned companies and the independent governance of public service media

- On the 20 November 2025 a legislative bill was submitted by the executive power concerning the transparency in the field of state advertising and is pending before the House Standing Committee on Internal Affairs. The bill concerns the implementation of certain articles of the Regulation (EU) 2024/900 of the European Parliament and of the Council on the transparency and targeting of political advertising.

- A bill concerning the transparency of media ownership is expected to be submitted in the next coming weeks. The bill in question aims to comply and more effectively implement the relative provisions of Regulation (EU 2024/1083 of the European Parliament and of the Council concerning the establishment of a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act).

(2) Information on:

a. **developments that are relevant for updating and following up on the assessment of the topics covered in the respective country chapter of the 2025 Report, including possible clarifications**

- *In the boxes below, describe developments (updates or feedback) related to the topics covered in your country chapter of the 2025 Report (if not already covered under point (1)). You are invited to follow the order of topics as presented in the country chapter and insert direct references to the country chapter text, if convenient; and*

b. **any other new developments not already covered under points (1) and (2)a. that you consider relevant**

- *The list of topics provided* ***in the Annex*** *can provide guidance for this input.*

I. Justice Systems

- ***MINISTRY OF JUSTICE AND PUBLIC ORDER***

Efficiency of the justice system

(1) As per the information provided last year, the Ministry of Justice and Public Order, in an effort to improve the efficiency of the justice system (making procedures less time-consuming and reducing multiplicity of procedures), has drafted and submitted a bill to the House of Representatives amending the Criminal Procedure Law, Cap. 155.
More specifically, the bill amends the law so that court decisions issuing warrants for the arrest of a person or the search of premises, as well as court decisions rejecting the relevant police applications for the issuance of such warrants, will be subject to appeal. At present, these decisions are subject to judicial review (through applications for the issuance of prerogative writs such as certiorari and/or prohibition).
The bill is currently pending before the Parliamentary Committee on Legal Affairs, Justice and Public Order. It should be noted, however, that major objections to the philosophy of the bill were raised by the Cyprus Bar Association during the first session of the Parliamentary Committee on this matter, whilst the Supreme Court supports the bill.

(2) Further to the above, the amending bills prepared by the Ministry of Justice and Public Order, which amend the courts' administrative structure, were passed into law and published in the Official Gazette of the Republic on 25.07.2025. The provisions of the new laws include: (a) the establishment of a new Administrative Court of Appeal; (b) the Administrative Court of Appeal and the first-instance administrative courts are subordinate to the Supreme Constitutional Court; (c) the Court of Appeal and all other courts of first instance continue to be subordinate to the Supreme Court; and (d) the creation of a new Supreme Council of Judicature in relation to procedures concerning the appointment, promotion, transfer and discipline of judges of the Administrative Court of Appeal and the first-instance administrative courts.

(3) Following the information provided last year regarding the amending bill titled "Mediation on Certain Matters in Civil Disputes (Amendment) Law of 2025" *and*

the Regulations titled "Mediation in Civil Disputes Regulations of 2025", *prepared by the Ministry of Justice and Public Order, both are pending consideration before the Parliamentary Committee on Legal Affairs, Justice and Public Order.*

(a) The bill includes amendments to the law aimed at making the institution of mediation more effective and functional. These amendments include the consolidation of the two currently maintained Registers of Mediators into a single unified Register, as well as mandatory training for all mediators without exception.
One of the key innovations introduced by the proposed bill is the mandatory initial mediation session where the value of the dispute does not exceed five thousand euros (€5,000).
In cases where a party fails to attend the mandatory initial mediation session, the bill provides for sanctions to be imposed. Specifically, the party loses the right to claim legal costs and interest related to the judicial proceedings. This amendment serves as an incentive for parties to engage in the mediation process.
(b) The Regulations determine the following:
• The remuneration of the mediator.
• The content of the specialised professional training, as such training is a requirement for registration in the Register of Mediators.
• The content of the ongoing professional training of mediators, as ongoing training is a requirement for maintaining registration in the Register of Mediators.

(4) Regarding efforts to promote the use of alternative dispute resolution, as noted in the information provided last year, the Ministry of Justice and Public Order prepared a draft bill titled *"The Arbitration Law of 2025"*, with the aim of repealing the two existing laws ("The Arbitration Law – Cap. 4" and "The International Commercial Arbitration Law of 1987" (L.101/1987)). This had been a long-standing request from all parties involved in arbitration. Following a study by the Ministry of Justice and Public Order of both the legislative and judicial framework on the matter, as well as a series of discussions with relevant stakeholders to identify various issues, the draft bill was put to official public consultation and finalised based on the comments received. The draft bill was sent in September 2025 to the Legal Service of the Republic for legal vetting.

(5) Legal Aid:
(a) As noted in the information provided last year regarding the legal aid scheme, an amending bill prepared by the Ministry of Justice and Public Order was passed into law and published in the Official Gazette of the Republic on 15 November 2024. The provision of free legal aid is established for persons who have suffered gender-based and domestic violence, provided that they submit to the court a certificate issued by a competent authority certifying that the victim is receiving services from the Women's House or is staying in a shelter for victims of domestic violence, or that, after filing a complaint with the Police regarding violence committed against them, criminal prosecution has been initiated against the perpetrator.
(b) In addition, another amending bill prepared by the Ministry of Justice and Public Order concerning legal aid was passed into law and published in the Official Gazette of the Republic on 31 December 2024. Under the new law, rotational legal aid has been established for applicants and beneficiaries of international protection, as well as for third-country nationals residing unlawfully in the Republic. Furthermore, among other

measures, the requirement for the Department of Social Welfare Services to prepare a socio-economic report for applicants for international protection before the Administrative Court of International Protection has been abolished. Provisions have also been introduced concerning the registration and removal of lawyers from the specific legal aid register, as well as additional measures, including the obligation to provide a reasoned judicial decision in cases where free legal aid is refused; the refusal of legal aid where an appeal before the Administrative Court of International Protection is filed out of time; the establishment of a criminal offence where a lawyer providing services under state-funded legal aid also receives additional fees from the applicant; and an increase in the penalty where a person makes a false declaration or conceals information in order to obtain free legal aid.
(c) Further to the above, the Ministry of Justice and Public Order prepared a draft bill aimed at implementing a rotation-based system for the legal aid scheme across all categories, in order to address issues arising in the provision of legal aid and to enhance the efficiency of the existing system. In this context, the Ministry organised and conducted a series of online meetings with representatives of all relevant stakeholders (the Supreme Court, the Cyprus Bar Association, and the Deputy Ministry of Research, Innovation and Digital Policy) to ensure comprehensive coordination and engagement. Following consultations with the stakeholders, the parameters of the new bill have been agreed upon for the implementation of a rotation-based legal aid system across all categories, as well as the parallel development and operation of a supporting software system. The bill is pending before the Legal Service of the Republic for legal vetting.

- **CYPRUS BAR ASSOCIATION**

- **Digitalisation of judicial procedures:**

In 2025, the first phase of the upgraded i-Justice system was activated as an interim solution following the failure of the original e-Justice project. The platform continues to be upgraded through the establishment of a dedicated unit, with the aim of completing the system by 2026.

The i-Justice platform is intended to enable electronic filing of documents, payments, case management, document registration, case allocation, monitoring the execution of judicial decisions, and other digital functions aimed at reducing bureaucracy and accelerating judicial proceedings.

Although i-Justice is expected to provide significant support, the transition to a fully operational e-Justice system (including all subsystems, interoperability, and the full elimination of handwritten/manual procedures) remains ongoing.

The timeline and effectiveness of the full implementation of digitalisation will be critical factors.

- **Alternative dispute resolution mechanisms:**

In 2025, the public consultation on the Arbitration Bill was completed. This Bill will repeal the existing Arbitration Law and the International Commercial Arbitration Law, thereby modernising the wider framework governing arbitration. The Bill is expected to be submitted to the Parliamentary Legal Affairs Committee upon completion of the legal vetting.

Furthermore, in 2025 the Civil Dispute Mediation (Amendment) Bill of 2025 and the related Regulations were submitted to the Parliamentary Legal Affairs Committee. These aim to introduce mandatory initial mediation sessions. The Bill remains pending due to disagreements among stakeholders regarding the financial threshold for mandatory sessions, as well as the proposed exemption of the Law Office.

- **New structure of the Supreme Courts:**

In 2025, the House of Representatives adopted a series of bills which, together with the 21st Amendment to the Constitution, establish a new system for administrative justice, an Administrative Court of Appeal, and a three-tier structure for the adjudication of such cases, with final review before the Supreme Constitutional Court.

This reform seeks to reduce the caseload of the courts and accelerate the administration of justice. The new arrangements also include updates to the process of appointing judges, particularly to higher courts, with an emphasis on specialisation (e.g., constitutional or administrative law).

- **Lack of judges and administrative/support staff:**

The Judicial Service requires additional judges, support staff and improved infrastructure — particularly to address the caseload and reduce delays.

The establishment of an independent Judicial Service remains pending, despite its critical importance. Such a body is essential to ensuring the effective and efficient functioning of the courts, as it would enable key administrative and operational decisions to be made promptly and independently, free from undue delay or external influence. Without an independent Judicial Service in place, the courts remain constrained in their ability to respond swiftly to institutional needs, thereby undermining the timely delivery of justice.

- **Enforcement of judgments:**

The revised version of the Bill on the enforcement of judgments remains pending before the Parliamentary Legal Affairs Committee. The existence of a robust and effective framework for the enforcement of judgments is equally critical to the administration of justice. Court decisions have little practical value if they cannot be implemented in a timely and reliable manner. An effective enforcement mechanism ensures that judgments are respected, rights are realized in practice, and legal remedies translate into tangible outcomes. Without such a framework, litigants may be left without meaningful redress, public confidence in the judicial system may be eroded, and the authority of the courts may be undermined. Strengthening enforcement procedures is therefore essential to upholding the rule of law, ensuring compliance with judicial decisions, and maintaining trust in the justice system as a whole.

- **New Developments:**

On 25/07/2025, the **Establishment of the National Sanctions' Implementation Unit and the Application of Restrictive Measures and National Sanctions of the Republic of Cyprus Law of 2025 (Law no. 150(I)/2025)** was published in the Official Gazette of the Republic of Cyprus, publicly accessible at https://www.cylaw.org/nomoi/enop/non-ind/2025_1_150/full.html. The main features of the said Law have as follows:

1. The provisions of the Law concern UN Security Council Sanctions, EU Restrictive Measures and National Sanctions of the Republic of Cyprus.
2. There is specific provision for the application of the LPP as Recognised by Law [*N.B.: under the Republic of Cyprus' Constitution, this also refers to the CJEU case law which has supreme status as per Article 1A of the Constitution, as well as, due to the existence of the ECHR Ratifying Law, enacted under the Constitution, the ECtHR case law*] regarding all the Members registered and supervised by the CBA as practicing advocates. A 'practicing advocate' means any natural or legal person that is supervised or/and licensed by CBA or is covered by the recognised by law professional privilege of the advocate.
3. The duty to submit a report to the NSIU has been limited. To that effect, there is an express exclusion regarding all persons [*N.B: under the Interpretation Law: legal or natural*] to which the LPP applies.
4. CBA is the sole Sanctions' Regulator, also by express reference to the Republic of Cyprus' AML Law being made in the NSIU Bill, regarding the supervised by CBA Members, enacting secondary legislation in the format of Sanctions' Directives and imposing administrative penalties including fines on the CBA Members.
5. The investigatory role regarding sanctions' infringement by CBA Members will be carried out, by necessary implication, due to the issuance of Directives, by CBA.
6. The sub-section of the draft Bill providing for the power of the Executive Branch, i.e. the Council of Ministers, to unilaterally issue Secondary Administrative Acts in the format of Regulations or Orders thereby limiting the jurisdiction and powers of the Self – Regulatory Bodies as Sanctions' Supervisors, has not been included in the Law.
7. NSIU can issue overall Directives as to the better application of the Restrictive Measures' and Sanctions' Regime.
8. NSIU can issue administrative penalties subject to the application of LPP, due to the operation of specific exclusions in the relevant Sections of the Law.
9. The CBA will be informing, in addition to NSIU, the Attorney – General of the Republic of Cyprus as well, in the event that the CBA has a reasonable suspicion that a person has committed or is committing an act or an omission that infringes restrictive measures or sanctions.
10. In the capacity thereof as the Advocates' Sanctions' Regulator, CBA could be called in, as part of the Consultative Body, made up by Governmental Authorities, regarding the better application of the Sanctions' Law, on an ad hoc basis.
11. CBA, as a Self – Regulatory – Sanctions' Authority is empowered to issue Regulatory or Binding Orders as to Risk Assessment and Tracing of Restrictive Measures or Sanctions' Infringements.
12. Any request from NSIU to CBA concerning the submission of report of data and/or documents to NSIU is subject to the professional privilege.
13. CBA has issued, in Greek, on the same date of 25/07/2025, an Announcement addressed to the CBA Members, which is accessible at https://www.cyprusbarassociation.org/index.php/en/news/51816-anakoinose-tou-pds-anaphorika-me-te-demosieuse-tou-peri-tes-idryses-tes-ethnikes-monadas-epharmoges-kyroseon-nomou-tou-2025. In the said Announcement, CBA noted, amongst other, that (a) the enactment of the Law had been a step forward in the correct direction of securing the Sanctions' application, and (b) the final text of the Law was considered by CBA as satisfactory as it guarantees the basic CBA request before the House of Representatives and the Ministry of Finance of the Republic of Cyprus, that being the

safeguarding of the LPP. To that effect, CBA also presented, in the text of the said Announcement, a list with prominent recent Judgements of the Court of Justice of the European Union (CJEU) and the European Court of Human Rights (ECtHR) on the subject matters of LPP and the application of the Principle of Proportionality.

II. Anti-Corruption Framework

INDEPENDENT AUTHORITY AGAINST CORRUPTION

Lobbying

The primary legislation governing lobbying is the *Transparency in Public Decision-Making Procedures and Related Matters Law of 2022* (Law 20(I)/2022), commonly referred to as the "Lobbying Law." The Law entered fully into force on 1 March 2024, with all provisions and obligations applicable to both public officials and lobbyists. Its purpose is to ensure transparency in interactions between lobbyists and public officials, including the disclosure of meetings, communications, and the subject matter of lobbying activities. The overarching objective is to prevent corruption and enhance the integrity of public decision-making processes.

Individuals and entities engaged in lobbying activities are required to register with the Authority. This obligation extends to a broad range of actors, including trade unions, NGOs, and political party organisations. Currently, 256 lobbyists are registered. Registered lobbyists must comply with a Code of Conduct, prepared and overseen by the Authority, which sets out ethical standards and expected behaviour. The Code, the Lobbying Registry, and all relevant registration documents are publicly available on the Authority's website.

Since April 2024, numerous training sessions and presentations have been conducted, with particular emphasis on high-risk sectors, to provide guidance and information on the implementation of the Lobbying Law. In total, forty-one (41) training sessions and/or presentations were delivered by members and staff of the Authority to various government departments and ministries, independent and local authorities, and NGOs (including the Treasury of the Republic of Cyprus, the State Health Services Organisation (OKYPY), the Accountant General, the General Healthcare System (GESY), the Central Bank of Cyprus, and Government Liaison Officers regarding Public Procurement Procedures—approximately 800 individuals—among others). Total attendance reached 1,965 participants, more than 120 of whom were high-level government officials.

Looking ahead to 2026, the Authority will continue its commitment to awareness-raising through presentations and training sessions. These ongoing efforts are essential to maintaining high levels of compliance and fostering a culture of integrity within government and semi-government institutions. Planned training sessions for 2026 include, inter alia, the Ministry of Defence, the Deputy Ministry of Research, Innovation and Digital Policy, the Electricity Authority of Cyprus (EAC), CYTA, the Cyprus Ports

Authority, Civil Aviation, the Cyprus Land Registry, and Municipalities.
In a significant procedural milestone, the Authority has completed the first three (3) cycles of semi-annual lobbying reports. During this process, registered lobbyists are required to consolidate and submit their activities for formal audit.
During the most recent audit (covering the period up to September 2025), the Authority conducted a detailed cross-check of the data to ensure the integrity of the reporting process. The audit focused primarily on:

- identifying inconsistencies through a comparison of individual "Communication Forms" (submitted immediately after meetings) with the summary data in the semi-annual reports; and
- verifying the accuracy and completeness of disclosures concerning contacts with public officials during the reporting period.

The audit identified a number of minor discrepancies between the real-time filings and the periodic summaries. However, the Authority concluded that these errors were administrative in nature and largely attributable to unfamiliarity with the new reporting requirements, rather than a deliberate attempt to conceal information. Given that this was the initial reporting cycle, the Authority adopted a constructive regulatory approach. Instead of imposing penalties or sanctions, it issued formal requests for corrections and clarifications.
This process functioned as a practical "learning phase" for both lobbyists and public officials, enabling the Authority to provide targeted feedback on how to align internal record-keeping practices with statutory requirements.

Complaints Handling

Up to 2025, the total number of complaints received reached 584. This steady increase in submissions constitutes an important indicator of growing public trust and confidence in the Authority's mandate.
An analysis of these submissions shows that a significant proportion of complaints lodged by individuals concern private disputes that fall outside the Authority's legal competence. To date, 321 complaints have been thoroughly examined and subsequently closed or terminated.
A notable achievement was the completion of fifteen (15) major investigation reports, five (5) of which have been formally forwarded to the Attorney General and other competent authorities for further action. Currently, six (6) investigations remain ongoing and are being conducted by appointed inspection officers.
The selection of investigating officers is subject to a rigorous framework. Candidates are appointed only after a comprehensive interview process and a strict due diligence review to ensure the highest standards of integrity and specialised expertise.
It is worth noting that a recent article in the local press[5] observed that the Authority's report concerning the Kouris River Committee and the operation of the fish farm in Trimiklini represented not merely a record of events, but a decisive step toward restoring citizens' trust in institutions. The article highlighted that references in the

[5] Phileleftheros Newspaper, Article "The moment of truth for Trimiklini" published 20/12/2025.

report to "pre-determined decisions" and "abuse of power" amounted to a serious indictment of systemic weaknesses in public administration. It further noted that the Independent Authority Against Corruption carried out its work with thoroughness and transparency, investigating 12 entities and dozens of witnesses, and concluded that, following the referral of the file to the Attorney General, society now awaits to see whether the findings will lead to tangible outcomes.

With regards to the submission of complaints and whistleblower protection, when the Authority receives a complaint that falls within the scope of Directive (EU) 2019/1937, it is duly recorded in the internal electronic complaints registry/database. All necessary actions are then taken in accordance with the requirements of the Directive. During 2025, no complaints were submitted that fell within this scope.

Awareness, Education and Prevention Strategy

In 2025, the Authority commenced the phased implementation of its Awareness and Prevention Strategy, a comprehensive framework developed in line with international best practices. This multi-dimensional strategy seeks to promote a cultural shift towards integrity and transparency through a series of targeted interventions.

A key pillar of the Strategy is the systematic education of the public workforce, with emphasis on the transparency and integrity standards set out in the newly revised *Guide of Conduct and Ethics of Civil Servants*[6]. Following the publication of the new Guide, the Authority focused on the practical application of ethical principles by participating in four specialised training programmes organised by the Cyprus Academy of Public Administration. These programmes were designed to ensure broad participation from across the public sector, thereby supporting the uniform implementation of the Guide. Through these sessions, a total of 362 civil servants were trained and equipped with the tools necessary to identify, report and prevent unethical practices within their respective departments.

In 2025, the Authority also achieved a significant milestone in its regulatory mission by completing the internal tender specifications for a major integrity study. This initiative forms a cornerstone of the horizontal implementation of Action 6 of the IAAC Anti-Corruption Plan. The study will engage independent experts to develop a comprehensive integrity guide aimed at safeguarding the conduct of Persons with Top Executive Functions (PTEFs) and their Commissioned Private Technical Advisers (CPTAs). By identifying systemic vulnerabilities and risks, the project will propose robust preventive measures and establish a clear methodology for ongoing compliance monitoring. This initiative is intended to ensure that individuals in top executive and advisory roles operate under the highest standards of transparency and accountability.

In alignment with Action 5 of the IAAC Anti-Corruption Plan, the Authority has initiated the designation of Anti-Corruption Liaison Officers. A formal request was addressed to the public and wider public sector—including ministries, independent authorities and municipalities—to appoint dedicated officers to serve as focal points for strategic engagement with the Authority. To date, approximately 200 officers have been designated. A centralised electronic registry has been established to facilitate

[6] The new Guide of Conduct and Ethics of Civil Servants was compiled by the Public Administration and Personnel Department of the Ministry of Finance, the Office of the Commissioner for Administration and the Protection of Human Rights (Ombudsman), and the Office of the Law Commissioner.

communication, coordination and the future implementation of sector-specific strategies.
At the same time, the IAAC is finalising its internal organisational structure to support the systematic execution of this action.

Cooperation with Other Institutions
The Authority actively promotes a network of strategic partnerships with both national and international organisations, recognising that the fight against corruption requires a coordinated and cross-border approach. This collaborative framework includes close cooperation with judicial bodies, law enforcement agencies, and specialised anti-corruption institutions, with a view to strengthening the exchange of information and best practices.
A significant development in the Authority's international engagement is the ongoing consideration of a Memorandum of Understanding (MoU) with the European Public Prosecutor's Office (EPPO).

- ***CYPRUS BAR ASSOCIATION***

Digitalisation and Modernisation of the Complaints System:
The Independent Authority Against Corruption announced its initiative to digitalize the submission, management and documentation of corruption complaints through the introduction of a unified electronic platform. The objective is to enhance transparency, strengthen data security and reinforce public trust.

Improvement of Cyprus's International Standing — Higher Score in the Corruption Index:

In 2025, Cyprus improved its position in Transparency International's Corruption Perceptions Index, gaining 3 points and reaching a score of 56/100. This advancement placed the country 46th among 180 states worldwide.

Cooperation Among the State, the Police and Civil Society in Prevention Efforts:
The Cyprus Integrity Forum (CIF) continued to play a proactive role. In May 2025, it held a meeting with the leadership of the Cyprus Police, during which the adoption of the international anti-bribery management standard ISO 37001 was agreed, aimed at preventing and addressing corruption within the police force and more broadly. Furthermore, under the Memorandum of Cooperation between CIF and the Cyprus Police, the first training workshop titled "Corruption & Integrity in Everyday Police Work" was conducted in 2025.

Recognition by International Bodies, Accompanied by Calls for Further Reforms:
According to a 2025 report by GRECO (Group of States against Corruption), Cyprus has fully implemented 6 of the recommended anti-corruption measures and partially implemented 13, while 3 remain outstanding. GRECO acknowledges the adoption of codes of conduct for government officials as a positive development, but emphasizes the need for further consolidation of the relevant oversight mechanism

Legislative Measures:

It is noted that key measures for enhancing transparency include the Law on Transparency in Public Decision-Making Processes (Lobbying), the separation of the Attorney General's prosecutorial functions from his advisory role, the strengthening of the Independent Authority Against Corruption, as well as the corresponding proposal for amendment of the Public Procurement legislation. The purpose of the drafted proposal of legislation entitled The Regulation of Procedures for the Award of Public Contracts and Related Matters (Amendment) (No. 2) Law of 2025 is to amend the existing Law on the Regulation of Procedures for the Award of Public Contracts and Related Matters, in order to establish safeguards that ensure transparency and impartiality in the award procedures of public contracts with an estimated value exceeding one hundred thousand euro (€100,000).

[redacted]

[redacted]

➢ ***HOUSE OF REPRESENTATIVES***

With regards to the implementation of the provisions of the Law on the President, Ministers and Members of Parliament (Declaration and Audit of Assets and Declaration of Personal and Professional Wealth) [Law 112(I)/2024], which entered into force on 1 August 2024, the application of this framework will be assessed for the first time in June 2026. This evaluation will take place following the parliamentary elections scheduled for May 2026, once the newly elected Members of the House of Representatives have assumed office.

III. Media Pluralism and Media Freedom

➢ ***MINISTRY OF JUSTICE AND PUBLIC ORDER***

Following the information provided the previous year, the Ministry of Justice and Public Order with the purposes of transposition of Directive 2024/1069/EU of the European Parliament and the Council of the European Union, prepared a draft bill, titled: "The Protection of Persons Engaging in Public Participation from Manifestly Unfounded Lawsuits or Abusive Judicial Proceedings Law of 2025". The bill was submitted in December 2025 to the House of Representatives and will be soon examined at the Parliamentary Committee of Legal Affairs, Justice and Public Order.

IV. Other institutional issues related to check and balances

- ***MINISTRY OF JUSTICE AND PUBLIC ORDER***

Accessibility and judicial review of administrative decisions

As noted in the information provided in the previous year, the Ministry of Justice and Public Order prepared a bill amending the Law on the General Principles of Administrative Law (Law 158(I)/1999) in order to regulate the issue of compliance of the Administration with court decisions. The bill was submitted for consultation to all stakeholders, and the Ministry is still in the process of examining the numerous comments received, most of which are critical of the bill's provisions and raise constitutional and other legal issues.

- ***AUDIT OFFICE OF THE REPUBLIC***

- Safeguards to ensure the effective independence of supervisory and regulatory authorities with a direct impact on economic operators

The fundamental principles that must be observed in order for a Supreme Audit Institution (SAI) to be regarded as independent are set out in INTOSAI-P 10, *The Mexico Declaration on SAI Independence*. The Declaration establishes eight core principles, which constitute the pillars of SAI independence. Against this framework, two of these principles are not fully met in the case of our Office:

- *Principle 4, which refers to the unrestricted access to information: SAIs should have adequate powers to obtain timely, unfettered, direct, and free access to all the necessary documents and information, for the proper discharge of their statutory responsibilities.*

During the year certain auditees have challenged the mandate of our Office to carry out specific audits, as follows:

The Prisons Department challenged our right to distribute a questionnaire amongst inmates that aimed in providing feedback regarding the quantity and quality of the food provided to them. This was resolved on the basis of a legal opinion issued by the Attorney General, however it caused significant delay in carrying out the audit.

The Central Bank of Cyprus challenged our right to have full access to information/data regarding the AML supervision it carries on banks (which does not form part of the Eurosystem) that we requested in the context of a parallel audit carried out with the Supreme Audit Institutions of the Netherlands, Germany and Spain, claiming that granting us access to this would compromise its independence. In the end a compromise was agreed, so that we could answer most of the relevant audit questions, however access to certain information was not allowed. It has been agreed that our Office and the Central Bank will draft a Memorandum of Understanding so that matters regarding our rights to audit Central Bank activities are clarified and agreed upon.

In general, it seems that, sometimes, it is not properly acknowledged that, the areas that are considered to be outside the scope of the audit of our Office create audit gaps and therefore gaps in the whole accountability and checks and balances system of the country.

Acknowledging the importance of the matter, the issue of access to information was the subject of discussions between the Auditor General and the Attorney General and it has been clarified that, in case our Office is refused access to information we consider necessary to perform our tasks, then we have the right to appeal to the Supreme Constitutional Court for a ruling.

- *Principle 8 Requires the Financial and managerial/administrative autonomy and the availability of appropriate human, material, and monetary resources.*

Following the recent legislative changes, our Office's budget does not constitute anymore part of the state budget that is approved by the Minister of Finance and Counsil of Ministers, but it is laid directly for voting to the Parliament, which is a positive development. It is worth noting that, the total amount of expenditure that the budget can cover continues to be set by the Ministry of Finance and the House of Parliament cannot increase it.

- ***MINISTRY OF INTERIOR***

The Ministry of Interior ("MoI") is in the process of amending the existing legislation, namely the *Law on Societies and Institutions and Other Related Matters* (Law 104(I)/2017), with the aim of further improving the legal framework for non-profit organisations ("NPOs").
The proposed amendments relate, inter alia, to issues of governance, financial reporting, registration and dissolution procedures.
Following the public consultation on the amending bill through the electronic consultation platform of the Republic of Cyprus (e-consultation.gov.cy), the MoI, in cooperation with a private sector company with relevant expertise (an external partner selected through a tender procedure), proceeded with further consultations with interested parties, including NPOs.
In particular, consultation groups were held with NPO representatives, during which they expressed their views and raised issues and/or other matters of concern.
Taking into account, inter alia, the proposals of the interested parties and the outcomes of the consultations, the MoI is currently finalising the draft amending legislation, which includes substantial changes compared to the initial draft. As a result of these changes, the final draft of the amending bill will be placed again under public consultation on the electronic consultation platform of the Republic of Cyprus (e-consultation.gov.cy) approximately by the end of February 2026, after which it will be submitted to the Law Office of the Republic for legislative review.

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 the box below.[7]

- ***CYPRUS BAR ASSOCIATION***

The Cyprus Bar Association (CBA) has actively supported, through the submission of proposals to the Ministry of Finance and to the Parliamentary Committee on Finance and Budget of the House of Representatives of the Republic of Cyprus, the enactment of the *Establishment of the Framework for the Screening of Direct Foreign Investments Law of 2025* (Law No. 194(I)/2025). In this regard, reference is made to the Minutes of the Plenary Session of the House of Representatives dated 30/10/2025, which include the Report of the aforementioned Parliamentary Committee on the relevant Bill (see pp. 354–359 of the Minutes, publicly accessible in Greek).

The Law was published in the Official Gazette of the Republic of Cyprus on 14/11/2025 and will enter into force on 02/04/2026. It further specifies and implements the provisions of Regulation (EU) 2019/452 of the European Parliament and of the Council of 19 March 2019 establishing a framework for the screening of foreign direct investments into the Union (EU FDI Screening Regulation).

The CBA looks forward to working with the competent authority, namely the Ministry of Finance, to ensure the effective and proportionate application of the Law and of the EU FDI Screening Regulation.

In this context, two informative events were organised: one by the CBA on 19/02/2025 and another by the Limassol Bar Association on 17/12/2025, focusing on the application of the FDI screening legal framework with respect to inward and outbound foreign direct investments.

Furthermore, on 22/01/2025, the CBA submitted a number of clarificatory queries to the European Commission concerning the application of Commission Recommendation (EU) 2025/63 of 15 January 2025 on reviewing outbound investments in technology areas critical to the economic security of the Union. Following receipt of the Commission's replies, the CBA published both the queries and the responses through an announcement dated 24/04/2025, in Greek, addressed to its members.

INDEPENDENT AUTHORITY AGAINST CORRUPTION

In response to the Commission's inquiry concerning the impact of anti-corruption measures on Cyprus's competitiveness and foreign investment, the Authority maintains that robust enforcement is a prerequisite for a well-functioning market. Its mandate to uphold the rule of law constitutes a key safeguard for democratic institutions and market integrity. By reducing corruption risks and promoting transparency, the Authority seeks to foster an environment of legal certainty. This, in turn, strengthens Cyprus's value proposition as a secure, predictable, and attractive destination for

[7] Given the cross-cutting nature of this question, it is included as a separate section in the questionnaire. Information collected under this question will however be integrated under the relevant existing pillar(s) of the Report.

international investors, thereby supporting long-term economic and social prosperity.

As regards the publication of your written input, please indicate whether you[8]:

☐ Consent

☐ Do not consent

[8] Should you wish to amend the input submitted ahead of the Report's publication, please simply indicate so to the Commission services which will ensure that the correct version is published.